

YZYNATION.COM; GMKIM.VN.UA; HOTKICKSS.RU; :
 EKO DG TRADING INC.; HYPEBOOSTS.RU; :
 HYPEBOOST.SHOP; HYPEBOOST.STORE; :
 HYPEBOOSTS.COM; HYPEBOOST.RU; JDFOOT.CO; :
 CLOTHSWMALLS.COM; VKOMALL; ONE PICK (HK) :
 LIMITED; PKSHOES.STORE; PEINABAXNYJ :
 POPSHOE.ORG; POPKICKS.ORG; JORDONKICKS.ORG; :
 DUNKSTICKS.ORG; TAOSNEAKERS.COM; :
 CNFASHIONCLUB.COM; UABAT.XYZ; :
 UABATMAN.COM; PKSTOCKX.CC; :
 SNEAKERWILL.SHOP; LUCKSHOES.RU; :
 PERFECTKICKS.TOP; JASKICKS.RU; COPTOP; :
 COPTOP.RU; COPTOP.NET; MISNEAKERS.COM; :
 BOMBLINE.CC; BOMBLINE.LA; :
 EBUYSNEAKERS.COM; SP XYLAR STUDIO; :
 XYLAR.CO; \$DEDIANFANG; RSNEAKERS.FUN; :
 DMSNEAKER.COM; SOLENLACES.COM; ABC :
 COMPANIES 1-100 and JOHN Does 1-100, :
 :
 Defendants. :
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Plaintiffs NIKE, Inc. (“**Nike**”) and Converse Inc. (“**Converse**” and together with Nike
 “**Plaintiffs**”) for their complaint against Defendants Shiby NY Inc.; Ming Fu Hong Trading
 Limited; rimisneaker.us; \$ytrading616; Mr. Wang; bstsnaker.com; bstsnakers.com;
 songsneaker.com; stockxshoes.com; stockxshoesvip.com; cocoshoesvip.com; bagsmalles.com;
 buykicks.me; Joom E-Commerce Company Limited; carlsneaker.com; ddkicks.net; Gdleyu Inc.;
 hotkicks.cc; hotkicks.org; hypeunique.com; hypeunique.is; hypeunique.me; EFX Fashion Inc.;
 kickmax.ru; footskick.ru; kickscentral.cc; kickcentral.me; killone.x.yupoo.com; Mistylea;
 kickwho.cc; kickwho.xyz; kickzluucas.com; Guoxiong Lin; lgrose.ru; xblo594.x.yupoo.com;
 Xianguo Zhou; lkkiks.com; 888kicks.ru; Mika Technology Co. Limited; mangomeee.com;
 mangomee.co; monicasneaker.cc; Bo Ying Trading Hong Kong Limited; houyw.x.yupoo.com;
 muksstore.x.yupoo.com; Sing Ying Trading Limited; rarerapsneaker.x.yupoo.com;
 rarerepclothing.x.yupoo.com; hewitt2303.x.yupoo.com; Pyn*Cnfashion Club; stylesneaks.com;

sharesneaker.us; sharesneaker.vip; sharesneakers.us; sharesneakers.vip; stockxpro.com; stockxpro.vip; stockxprovip.com; supersneakers.vip; timsneakers.com; Casnda Corp Limited-B2c; ubuysneakers.com; ulrica688.x.yupoo.com; wawone.com; stockxkicks.com; hypeshoes.co; bmlin.net; Star EFX Fashion Inc.; footskick.ru; clubkickz.com; \$kaideninc616; coolkicksmall.com; Wtp*stepsupshoes; crewkick.net; crewkicks.org; Jiemaο Commerce Co. Ltd; dopesneaker.co; Chan Wai; flightkickz.cn; flightkickz.com; kicksgate.com; ln5factory.com; yzination.com; gmkim.vn.ua; hotkickss.ru; EKO DG Trading Inc.; hypeboosts.ru; hypeboost.shop; hypeboosts.com; hypeboost.ru; jdfoot.co; clothswmall.com; Vkomall; One Pick (HK) Limited; pkshoes.store; Peinabaxnyj; popshoe.org; popkicks.org; jordonkicks.org; dunksticks.org; taosneakers.com; cnfashionclub.com; uabat.xyz; uabatman.com; pkstockx.cc; sneakerwill.shop; luckshoes.ru; perfectkicks.top; jaskicks.ru; COPTOP; coptop.ru; coptop.net; ml sneakers.com; bomblines.cc; bomblines.la; ebuysneakers.com; SP Xylar Studio; xylar.co; \$DedianFang; rsneakers.fun; dmsneaker.com; solenlaces.com; ABC Companies and John Does 1-100, (collectively, “Defendants”), allege as follows:

NATURE OF THE ACTION

1. This is an action for preliminary and permanent injunctive relief and damages associated with the Defendants’ intentional, unauthorized and unlawful use of Plaintiffs’ valuable trademarks in connection with Defendants’ sale and advertisement of counterfeit goods through at least 52 websites (the “**Infringing Websites**”) and other online platforms, such as social medial accounts (the “**Infringing Social Media**”, together the “**Infringing Platforms**”).
2. Consumers instantly recognize the various trademarks used to identify the goods merchandised or manufactured by Nike and Converse (collectively, the “**Plaintiff’s Marks**”). Over the years, millions of consumers have been exposed to the famous, arbitrary and fanciful

trademarks utilized by Nike and Converse through various platforms, including Plaintiffs' extensive advertising campaigns, through magazines and other periodicals, as depicted on television and in motion pictures, on the Internet, through social media, celebrity endorsements, and in other forms of unsolicited media coverage. As a result, Plaintiffs' respective trademarks have both deep, widespread exposure and recognition in the marketplace. Plaintiffs' Marks are among the most widely-recognized trademarks in the United States and around the world, as well as among the most popular with consumers. The fame and popularity of Plaintiffs' Marks adds enormous value to the authentic products that bear Plaintiffs' Marks ("**Plaintiffs Products**" and, separately, "**Nike Products**" and "**Converse Products**").

3. The Defendants, who have no affiliation with Nike or Converse, have attempted to capitalize on the popularity of the Plaintiffs' Marks by manufacturing and marketing counterfeit products falsely labeled as "Nike" or "Converse" (the "**Counterfeit Products**"). The Defendants in this action operate multiple counterfeiting networks (the "**Networks**") of websites and other online presences. As reflected in Exhibit 1, Plaintiffs have identified 52 Infringing Websites, which are operated through counterfeiting Networks (identified below and in Exhibit 1 as Networks 1-52). Each of Defendants' 98 Infringing Websites identified in Exhibits 2 and 7 is currently, or was within the past twelve months, advertising, offering to sell, and/or selling counterfeit Nike or Converse products to United States consumers. As reflected in Exhibit 4, Plaintiffs have identified 267 Infringing Social Media handles associated with Defendants, each of which is currently, or was within the past twelve months, advertising, offering to sell, and/or selling counterfeit Nike or Converse products to United States consumers or directing United States consumers to Defendants' related Infringing Websites.

4. To ensure that consumers make the association between Defendants' Counterfeit Products and the genuine Nike Products and Converse Products from which they were copied, Defendants not only copy the designs, patterns and color schemes associated with Plaintiffs' Products, but also expressly identify the Counterfeit Products as "Nike" or "Converse" products. Further, Defendants make unauthorized use of Plaintiffs' Marks, including the trademark-protected "Nike" and "Converse" names, throughout the Infringing Websites and Infringing Social Media on which these goods are advertised or offered for sale to consumers in the United States and this District.

5. Defendants have marketed, advertised, manufactured and sold their Counterfeit Products without Plaintiffs' permission, authorization, or approval. Defendants' conduct is likely to cause, and has caused, consumers mistakenly to believe that the Counterfeit Products sold and promoted by Defendants either are authentic Nike or Converse Products, are produced by Defendants under a license agreement, joint venture, or other form of authorization by Plaintiffs, or are otherwise endorsed by, authorized by, or affiliated with Plaintiffs, either at the point of sale, by the recipient of a gift, or when consumers and potential consumers see the Counterfeit Products in use.

6. For these and other reasons, Defendants have caused and, unless enjoined, will continue to cause, irreparable harm to Plaintiffs, and an incalculable loss of goodwill and damages.

PARTIES

Plaintiff

7. Plaintiff Nike, Inc. is an Oregon corporation with its principal place of business at One Bowerman Drive, Beaverton, Oregon 97005-6453. Nike is registered to do business in the State of New York, operates its "House of Innovation 000" on the corner of Fifth Avenue and 52nd

Street in Manhattan and maintains multiple stores in New York, offers its products for sale to consumers based in New York, and is the owner of the Nike trademarks at issue in this action.

8. Plaintiff Converse Inc. is a Delaware corporation with its principal place of business at 1 Lovejoy Wharf, Boston, MA, 02114. Converse is registered to do business in the State of New York, operates a flagship store on Broadway in New York City's SOHO neighborhood and maintains multiple stores in New York, offers its products for sale to consumers based in New York, and is the owner of the Converse trademarks at issue in this action. Converse is a wholly-owned subsidiary of Nike, Inc.

Defendants

9. Upon information and belief, Defendants are individuals and entities, both known and unknown, who are members of various Networks of international counterfeiters, all of whom sell Counterfeit Products which infringe on Plaintiffs' Marks.

10. Defendants have used tactics to conceal their true identities and the full scope of their counterfeiting operations, making it impossible for Plaintiffs to learn Defendants' true identities and the exact interworking of their counterfeit Networks. If Defendants provide additional credible information regarding their identities, Plaintiffs will take appropriate steps to amend this Complaint.

11. Upon information and belief, the majority of Defendants reside and/or operate their illicit counterfeiting scheme in the People's Republic of China, Malaysia, and other foreign jurisdictions.

Network 1 Defendants

12. Upon information and belief, Network 1 consists of 3 Infringing Websites, 2 known Defendant names, and 2 email addresses, and 5 Infringing Social Media accounts, as well as

other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 1 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 1.”

13. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 1.

14. In order to uncover identifying information of the Network 1 Defendants, on September 11, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Supreme X Nike SB DunkLow “Rammellee” sneakers, from the website rimisneaker.ru, which is part of Network 1. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

15. Plaintiffs have reason to believe that Defendants Shiby NY Inc. and Ming Fu Hong Trading Limited, doing business as Infringing Websites rimisneaker.ru, rimisneaker.cc, and rimisneaker.us, and through the email addresses rimisneaker@gmail.com and sz@baofuplus.com, and the Infringing Social Media accounts [rimisneaker_1](https://www.instagram.com/rimisneaker_1) (Instagram) and 8615622391330 (Whatsapp) and 8617359417330 (Whatsapp) and UCMtsBM93bWwMNlbYKuLEY8Q (Youtube) and [rimisneaker](https://www.whatsapp.com/channel/0029va8617359417330) (WeChat), is part of Network 1 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as rimisneaker.ru, rimisneaker.cc, and rimisneaker.us has acted in conjunction with all the Network 1 Defendants,

including the Infringing Websites, Infringing Social Media accounts, email address, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

16. Upon information and belief, the Network 1 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the Uniform Resource Locators (“**URLs**”) as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 1.”

17. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 1 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 1.”

Network 2 Defendants

18. Upon information and belief, Network 2 consists of 5 Infringing Websites, 2 known Defendant names, and 5 email addresses, and 17 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 2 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 2.”

19. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 2.

20. In order to uncover identifying information of the Network 2 Defendants, on August 22, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Air Jordan 1 X Fragment X Travis Scott, from the website bstsneaker.com, which is part of Network 2. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

21. Plaintiffs have reason to believe that Defendant Mr. Wang doing business as merchant account \$ytrading616, Infringing Website bstsneaker.com and bstsneakers.com and songsneaker.com and stockxshoes.com and stockxshoesvip.com, and through the email addresses amy@bstsneaker.com and amy@bstsneakers.com and info@smartsselfbalancewheel.com and maysong@songsneaker.com and service@stockxshoes.com, and the Infringing Social Media accounts 18950744921 (WeChat) and 85244048557 (Whatsapp) and 85297976425 (Whatsapp) 8613646012644 (Whatsapp) and 8618950744921 (Whatsapp) and SongSneaker-105636734730124 (Facebook) and UCW6c2Qjjrc_eRBttl6F-nUQ (Youtube) and UCiVgTu562GBKYVETpPrNCHA (Youtube) and UCoxkgQebYcC7Wpnc4q5Ykzg (Youtube) and UCtnTC07rJe8fiIoxg5xc5qg (Youtube) and bstsneaker.store (Instagram) and bstsneakers.store (Instagram) and [bstsneakersofficial](https://bstsneakersofficial.com) (Instagram) and r/BSTReps (Reddit) and r/Stockxshoescom (Reddit) and [stockxshoes_tt](https://stockxshoes_tt.com) (Instagram) and [stockxshoes_xx2](https://stockxshoes_xx2.com) (Instagram), is part of Network 2 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as bstsneaker.com and bstsneakers.com and

songsneaker.com and stockxshoes.com and stockxshoesvip.com has acted in conjunction with all the Network 2 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown. Upon information and belief, the Network 2 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 2.”

22. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 2 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 2.”

Network 3 Defendants

23. Upon information and belief, Network 3 consists of 3 Infringing Websites, and 1 email address, and 7 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 3 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 3.”

24. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 3.

25. In order to uncover identifying information of the Network 3 Defendants, on October 20, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Nike Air Max Scorpion FK Lunar New Year Leap High, from the website cocoshoesvip.com, which is part of Network 3. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

26. Plaintiffs have reason to believe that Defendant doing business as Infringing Websites cocoshoesvip.com and cocoshoes.net and bagsmalles.com, and through the email address cocoshoes2011@gmail.com, and the Infringing Social Media Accounts 85264329578 (Whatsapp) COCO-SHOES-108421181587233 (Facebook) UCbFWidqtG9P82KIW81RbNIQ (Youtube) [cocoshoesjing_](https://www.instagram.com/cocoshoesjing_) (Instagram) [cocoshoesnet](https://www.instagram.com/cocoshoesnet) (Instagram) and [cocoshoesshop_](https://www.instagram.com/cocoshoesshop_) (Instagram) and 18950744921 (Wechat), is part of Network 3 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as cocoshoesvip.com and cocoshoes.net and bagsmalles.com has acted in conjunction with all the Network 3 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

27. Upon information and belief, the Network 3 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as

well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 3.”

28. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 3 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 3.”

Network 4 Defendants

29. Upon information and belief, Network 4 consists of 1 Infringing Website, 4 email addresses, and 8 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 4 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 4.”

30. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 4.

In order to uncover identifying information of the Network 4 Defendants, on July 17, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Air Force 1 Tiffany, from the

website buykicks.me, which is part of Network 4. This product was shipped to New York.

Plaintiff has verified that this product is counterfeit.

31. Plaintiffs have reason to believe that Defendant doing business as Infringing Website buykicks.me, and through the email addresses buykicks888@163.com and buykicks888@gmail.com and 8618171220597 (Whatsapp) and 861886529701 (Whatsapp) and buykicks88 (Instagram) and nicejordansnet3 (Instagram) and shoeboxes068 (Instagram) and 8618171220597 (Wechat) and 861886529701 (Wechat) and 8618086529701 (Whatsapp), is part of Network 4 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as buykicks.me, has acted in conjunction with all the Network 4 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

32. Upon information and belief, the Network 4 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 4.”

33. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 4 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 4.”

Network 5 Defendants

34. Upon information and belief, Network 5 consists of 1 Infringing Website, 1 known Defendant name, and 2 email addresses, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 5 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 5.”

35. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 5.

36. In order to uncover identifying information of the Network 5 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Desert Ore Owf Air Max 90 Off-White sneakers, from the website carlsneaker.com, which is part of Network 5. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

37. Plaintiffs have reason to believe that Defendant Joom E-Commerce Company Limited, doing business as Infringing Website carlsneaker.com, and through the email addresses baowu66520@163.com and carlkicks.com@gmail.com, and the Infringing Social Media accounts 18396000349 (Whatsapp) and 8618396000349 (Whatsapp) and carlkicks (WeChat) and carlkicks1 (Instagram), is part of Network 5 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and

belief, Defendant doing business as carlsneaker.com has acted in conjunction with all the Network 5 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

38. Upon information and belief, the Network 5 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 5.”

39. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 5 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 5.”

Network 6 Defendants

40. Upon information and belief, Network 6 consists of 1 Infringing Website, 2 email addresses, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 6 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 6.”

41. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 6.

42. In order to uncover identifying information of the Network 6 Defendants, on July 25, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Air Jordan 4 Retro Black Cat sneakers, from the website ddkicks.net, which is part of Network 6. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

43. Plaintiffs have reason to believe that Defendant doing business as Infringing Website ddkicks.net, and through the email addresses chenyansong7706@outlook.com and ddkicks2009@gmail.com, and the Infringing Social Media accounts 8617359057025 (Whatsapp) and UC-A9EoPxIEYZjAsyaRBGcjA (Youtube) and [ddkicks2009](https://www.instagram.com/ddkicks2009) (Instagram) and [r/ddkicks](https://www.reddit.com/r/ddkicks) (Reddit), is part of Network 6 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as ddkicks.net has acted in conjunction with all the Network 6 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

44. Upon information and belief, the Network 6 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading "Defendants – Network 6."

45. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 6 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 6.”

Network 7 Defendants

46. Upon information and belief, Network 7 consists of 2 Infringing Websites, 1 known Defendant names, and 3 email addresses, and 8 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 7 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 7.”

47. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 7.

48. In order to uncover identifying information of the Network 7 Defendants, on July 26, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Ljr Jordan 1 Retro High White University Blue Black sneakers, from the website hotkicks.cc, which is part of Network 7. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

49. Plaintiffs have reason to believe that Defendant GDLEYU Inc. doing business as Infringing Websites hotkicks.cc and hotkicks.org, and through the email addresses hotkicks.cc@gmail.com and hotkicks666@gmail.com and LQG7183167666@gmail.com, and the Infringing Social Media accounts 16167554659 (Whatsapp) and 85257671726 (Whatsapp) and [hotkicks.cc](https://www.facebook.com/hotkicks.cc) (Facebook) and [hotkicks.cc2](https://www.instagram.com/hotkicks.cc2) (Instagram) and [hotkicks.org](https://www.facebook.com/hotkicks.org) (Facebook) and [hotkicks_official](https://www.instagram.com/hotkicks_official) (Instagram) and [hotkicksorg.official2](https://www.instagram.com/hotkicksorg.official2) (Instagram) and [r/HotKicks_Offical](https://www.reddit.com/r/HotKicks_Offical) (Reddit), is part of Network 7 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as hotkicks.cc has acted in conjunction with all the Network 7 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

50. Upon information and belief, the Network 7 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 7.”

51. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 7 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 7.”

Network 8 Defendants

52. Upon information and belief, Network 8 consists of 3 Infringing Websites, 1 known Defendant name, and 2 email addresses, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 8 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 8.”

53. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 8.

54. In order to uncover identifying information of the Network 8 Defendants, on July 17, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Jordan 3 Retro Racer Blue sneakers, from the website hypeunique.is, which is part of Network 8. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

55. Plaintiffs have reason to believe that Defendant GDLEYU Inc., doing business as Infringing Websites hypeunique.is and hypeunique.com and hypeunique.me and through the email addresses cshypeunique@gmail.com and lqg718316766@gmail.com, and the Infringing Social Media accounts 85251750050 (Whatsapp) and UCRdNAICN3iK_tZjr3yrjja (Youtube) and [hypeunique.review](https://www.instagram.com/hypeunique.review) (Instagram) and [hypeunique__review](https://www.instagram.com/hypeunique__review) (Instagram), is part of Network 8 and is an individual or entity whose, upon information and belief, actual name and address is

currently unknown. Upon information and belief, Defendant doing business as hypeunique.is and hypeunique.com and hypeunique.me has acted in conjunction with all the Network 8 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

56. Upon information and belief, the Network 8 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 8.”

57. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 8 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 8.”

Network 9 Defendants

58. Upon information and belief, Network 9 consists of 1 Infringing Website, 1 known Defendant name, and 2 email addresses, and 3 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 9 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email

addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 9.”

59. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 9.

60. In order to uncover identifying information of the Network 9 Defendants, on July 17, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Air Jordan 4 “Red Thunder” sneakers, from the website kickmax.ru, which is part of Network 9. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

61. Plaintiffs have reason to believe that Defendant EFX Fashion Inc. doing business as Infringing Website kickmax.ru, and through the email addresses kickmax08@gmail.com and Delta1879@outlook.com, and the Infringing Social Media accounts 85368525066 (Whatsapp) and [gslucky88](https://www.instagram.com/gslucky88) (Instagram) and [kickmax0](https://www.instagram.com/kickmax0) (Instagram), is part of Network 9 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as kickmax.ru has acted in conjunction with all the Network 9 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

62. Upon information and belief, the Network 9 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as

well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 9.”

63. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 9 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 9.”

Network 10 Defendants

64. Upon information and belief, Network 10 consists of 3 Infringing Websites, 2 email addresses, and 7 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 10 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 10.”

65. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 10.

66. In order to uncover identifying information of the Network 10 Defendants, on August 29, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nike SB Dunk Low Pro

Why So Sad? Manes sneakers, from the website kickscentral.cc, which is part of Network 10. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

67. Plaintiffs have reason to believe that Defendant doing business as Infringing Websites kickscentral.cc and kickscentral.me and killone.x.yupoo.com, and through the email addresses kickscentralnet@gmail.com and 5258430008@qq.com, and through Infringing Social Media accounts 8618250518099 (Whatsapp) and kicks_wow (Instagram) and pinkkickz (Instagram) UCLOCBVp7Np1mfjGVDtok3EA (Youtube) and kickscentral (WeChat) and kicksfollow (Instagram) and r/kickscentral (Reddit), is part of Network 10 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as kickscentral.cc has acted in conjunction with all the Network 10 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

68. Upon information and belief, the Network 10 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 10.”

69. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 10 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 10.”

Network 11 Defendants

70. Upon information and belief, Network 11 consists of 2 Infringing Websites, 1 known Defendant names, and 2 email addresses, and 11 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 11 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 11.”

71. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 11.

72. In order to uncover identifying information of the Network 11 Defendants, on July 17, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Godkiller Nike Kobe 6 Protro Eybl 2.0 sneakers, from the website kickwho.xyz, which is part of Network 11. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

73. Plaintiffs have reason to believe that Defendant doing business as merchant account misstylea, Infringing Websites kickwho.xyz and kickwho.cc, and through the email addresses admin@kickwho.org and kickwhoofficial@gmail.com, and Infringing Social Media accounts 85253741963 (Whatsapp) and 85255139716 (Whatsapp) and 85291452559 (Whatsapp) and 8613023858310 (Whatsapp) and kickwho (WeChat) and kickwho-snkrs (WeChat) and kwsnkrs.review (Instagram) and r/kickwho (Reddit) and shoe_reviewss (Instagram) and

u/kickwho_1 (Reddit), is part of Network 11 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as kickwho.xyz has acted in conjunction with all the Network 11 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

74. Upon information and belief, the Network 11 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 11.”

75. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 11 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 11.”

Network 12 Defendants

76. Upon information and belief, Network 12 consists of 1 Infringing Website, 2 known Defendant name, and 3 email addresses, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 12 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to

be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 12.”

77. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 12.

78. In order to uncover identifying information of the Network 12 Defendants, on July 17, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Air Jordan 1 Low White Pollen sneakers, from the website kickzluucas.com, which is part of Network 12. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

79. Plaintiffs have reason to believe that Defendants Joom E-Commerce Company Limited and Xiamen Tongan District Donghongqi Trading Co., Ltd. (厦门同安区东虹启贸易有限公司), doing business as Infringing Website kickzluucas.com, and through the email addresses sneaker1908@outlook.com and yaozee@hotmail.com, and through Infringing Social Media accounts 8613959504723 (Whatsapp) and [kickzluucasofficial](https://www.instagram.com/kickzluucasofficial) (Instagram), is part of Network 12 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as kickzluucas.com has acted in conjunction with all the Network 12 Defendants, including the Infringing Websites, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

80. Upon information and belief, the Network 12 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious

force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, listed in Exhibit 1 under the heading “Defendants – Network 12.”

81. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 12 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 12.”

Network 13 Defendants

82. Upon information and belief, Network 13 consists of 2 Infringing Websites, 1 known Defendant names, and 2 email addresses, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 13 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 13.”

83. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 13.

84. In order to uncover identifying information of the Network 13 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nike Dunk Low

Bordeaux sneakers, from the website lgrose.ru, which is part of Network 13. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

85. Plaintiffs have reason to believe that Defendant Guoxiong Lin, doing business as Infringing Websites lgrose.ru and xbl0594.x.yupoo.com, and through the email addresses lgroseru@outlook.com and guolinleov@yeah.net, and the Infringing Social Media accounts 8613599017477 (Whatsapp) and 8613599462933 (Whatsapp) and lgrose.ru (Instagram) and lgroseru55 (Instagram), is part of Network 13 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as lgrose.ru has acted in conjunction with all the Network 13 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

86. Upon information and belief, the Network 13 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 13.”

87. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 13 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 13.”

Network 14 Defendants

88. Upon information and belief, Network 14 consists of 1 Infringing Website, 2 known Defendant names, and 2 email addresses, and 3 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 14 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 14.”

89. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 14.

90. In order to uncover identifying information of the Network 14 Defendants, on July 17, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Concepts X Nike Sb Dunk Low Orange Lobster sneakers, from the website lkkiks.com, which is part of Network 14. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

91. Plaintiffs have reason to believe that Defendants Xianguo Zhou and Bo Ying Trading Hong Kong Limited, doing business as Infringing Website lkkiks.com, and through the email addresses lkkikspro@gmail.com and zxg0508@yeah.net, and the Infringing Social Media accounts 8613459075059 (Whatsapp) and lkkiks (WeChat) and lkkiks_com (Instagram), is part of Network 14 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as

lkkiks.com has acted in conjunction with all the Network 14 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

92. Upon information and belief, the Network 14 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 14.”

93. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 14 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 14.”

Network 15 Defendants

94. Upon information and belief, Network 15 consists of 1 Infringing Website, 2 email address, and 5 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 15 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 15.”

95. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 15.

96. In order to uncover identifying information of the Network 15 Defendants, on July 26, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Jordan 4 Retro Sb Pine Green sneakers, from the website 888kicks.ru, which is part of Network 15. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

97. Plaintiffs have reason to believe that Defendant doing business as Infringing Website 888kicks.ru, and through the email addresses service@888kicks.ru and zhongwei6983@outlook.com, and the Infringing Social Media accounts 85254929956 (Whatsapp) and 8617396500129 (Whatsapp) and UC_sm5K0xcii0FEZKm4TQYKQ (Youtube) and love888kicks (Instagram) and r/888kicks (Reddit), is part of Network 15 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as 888kicks.ru has acted in conjunction with all the Network 15 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

98. Upon information and belief, the Network 15 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading "Defendants – Network 15."

99. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 15 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 15.”

Network 16 Defendants

100. Upon information and belief, Network 16 consists of 1 Infringing Website, 1 known Defendant names, and 2 email addresses, and 7 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 16 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 16.”

101. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 16.

102. In order to uncover identifying information of the Network 16 Defendants, on July 17, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nba 2k20 X Kobe 5 Protro “Chaos Alternate” sneakers, from the website mangomeee.com, which is part of Network 16. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

103. Plaintiffs have reason to believe that Defendant Mika Technology Co. Limited, doing business as Infringing Website mangomeee.com, and through the email addresses blackstore19@163.com and shiyingliao1@gmail.com, and the Infringing Social Media accounts 8613255911553 (Whatsapp) and 8617759076897 (Whatsapp) and mangofamilyshoes (WeChat) and mangomeee (WeChat) and mangomeee.snkr (Instagram) and mangomeee.snkr (Instagram) and mangomeee2022 (Instagram), is part of Network 16 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as mangomeee.com has acted in conjunction with all the Network 16 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

104. Upon information and belief, the Network 16 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 16.”

105. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 16 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 16.”

Network 17 Defendants

106. Upon information and belief, Network 17 consists of 1 Infringing Website, 3 email addresses, and 6 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 17 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 17.”

107. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 17.

108. In order to uncover identifying information of the Network 17 Defendants, on July 17, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Og Nike Sb Dunk Low Philadelphia Phillies neakers, from the website mangomeee.co, which is part of Network 17. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

109. Plaintiffs have reason to believe that Defendant doing business as Infringing Website mangomeee.co, and through the email addresses lesslieuey@gmail.com and 2803417414@qq.com and mangomeeeofficial@163.com, and the Infringing Social Media accounts 85252610300 (Whatsapp) and 85265997053 (Whatsapp) and 447927522960 (Whatsapp) and UC3G1SHtuPYzJjtHLKfXcENw (Youtube) and [mangomeee_official](https://www.instagram.com/mangomeee_official) (Instagram) and [mangomeeeclub](https://www.instagram.com/mangomeeeclub) (Instagram), is part of Network 17 and is an individual or entity

whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as mangomeee.co has acted in conjunction with all the Network 17 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

110. Upon information and belief, the Network 17 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 17.”

111. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 17 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 17.”

Network 18 Defendants

112. Upon information and belief, Network 18 consists of 1 Infringing Website, 1 known Defendant names, and 3 email addresses, and 7 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 18 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email

addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 18.”

113. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 18.

114. In order to uncover identifying information of the Network 18 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nike Kobe 6 Protro Mambacita Sweet 16 sneakers, from the website monicasneaker.cc, which is part of Network 18. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

115. Plaintiffs have reason to believe that Defendant Ming Fu Hong Trading Limited, doing business as Infringing Website monicasneaker.cc, and through the email addresses 921478041@qq.com and monicasneaker@gmail.com and ellen143feng@hotmail.com, and the Infringing Social Media accounts 8617007357135 (Whatsapp) and 8618396001806 (Whatsapp) and 8618396001806 (WeChat) and monicasneaker.ccc (Instagram) and 8617189364043 (Phone) and r/monicasneaker (Reddit) and u/og_monica (Reddit), is part of Network 18 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as monicasneaker.cc has acted in conjunction with all the Network 18 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

116. Upon information and belief, the Network 18 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious

force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 18.”

117. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 18 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 18.”

Network 19 Defendants

118. Upon information and belief, Network 19 consists of 1 Infringing Website, 1 known Defendant name, and 1 email address, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 19 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 19.”

119. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 19.

120. In order to uncover identifying information of the Network 19 Defendants, on July 17, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of GD batch Air Jordan 1

Travis Scot x Military Blue sneakers, from the website houyw.x.yupoo.com, which is part of Network 19. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

121. Plaintiffs have reason to believe that Defendant Bo Ying Trading Hong Kong Limited, doing business as Infringing Website houyw.x.yupoo.com, and through email address 1044086152@qq.com, and through the Infringing Social Media account 8613266816871 (Whatsapp) and 8618183338814 (Whatsapp) and mr-hou4898 (WeChat) and mrhou_4898 (Instagram), is part of Network 19 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as houyw.x.yupoo.com has acted in conjunction with all the Network 19 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

122. Upon information and belief, the Network 19 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 19.”

123. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 19 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 19.”

Network 20 Defendants

124. Upon information and belief, Network 20 consists of 1 Infringing Website, 2 known Defendant names, and 1 email address, and 3 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 20 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 20.”

125. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 20.

126. In order to uncover identifying information of the Network 20 Defendants, on August 27, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nike SB Dunk Low Yellow Lobster, from the website muksstore.x.yupoo.com, which is part of Network 20. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

127. Plaintiffs have reason to believe that Defendants Yongle Liu (刘永乐) and Bo Ying Trading Hong Kong Limited, doing business as Infringing Website muksstore.x.yupoo.com, and email address 1273525285@qq.com, and Infringing Social Media accounts 18105229793 (Whatsapp) and 8613799614052 (Whatsapp) and official_muksstore (Instagram), is part of Network 20 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as

muksstore.x.yupoo.com has acted in conjunction with all the Network 20 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

128. Upon information and belief, the Network 20 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 20.”

129. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 20 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 20.”

Network 21 Defendants

130. Upon information and belief, Network 21 consists of 2 Infringing Websites, 1 known Defendant names, and 1 email address, and 5 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 21 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 21.”

131. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 21.

132. In order to uncover identifying information of the Network 21 Defendants, on July 18, 2022, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Nike Dunk SB Low Jedi sneakers, from the website rarerapsneaker.x.yupoo.com, which is part of Network 21. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

133. Plaintiffs have reason to believe that Defendant Sing Ying Trading Limited, doing business as Infringing Websites rarerapsneaker.x.yupoo.com, and rarerepclothing.x.yupoo.com, and email address 1223778499@qq.com, and the Infringing Social Media accounts 13328838183 (WeChat) and 8613328838183 (Whatsapp) and rarerepclothing (Instagram) and rarerepsneaker2 (Instagram) and rarerepsneaker3 (Instagram), is part of Network 21 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as rarerapsneaker.x.yupoo.com has acted in conjunction with all the Network 21 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

134. Upon information and belief, the Network 21 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as

well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 21.”

135. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 21 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 21.”

Network 22 Defendants

136. Upon information and belief, Network 22 consists of 1 Infringing Website, 1 email address, and 2 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 22 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 22.”

137. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 22.

138. In order to uncover identifying information of the Network 22 Defendants, on July 26, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Union x Air Jordan 1

High “Woven” sneakers, from the website hewitt2303.x.yupoo.com, which is part of Network 22. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

139. Plaintiffs have reason to believe that Defendant doing business as Infringing Website hewitt2303.x.yupoo.com, and through the email address 3528315590@qq.com, and through Infringing Social Media accounts 8618879144396 (Whatsapp) and ryannorman4 (Instagram), is part of Network 22 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as hewitt2303.x.yupoo.com has acted in conjunction with all the Network 22 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

140. Upon information and belief, the Network 22 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 22.”

141. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 22 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 22.”

Network 23 Defendants

142. Upon information and belief, Network 23 consists of 9 Infringing Websites, 1 known Defendant names, 3 email addresses, and 12 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 23 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 23.”

143. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 23.

144. In order to uncover identifying information of the Network 23 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Air Jordan 4 Thunder sneakers, from the website stylesneaks.com, which is part of Network 23. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

145. Plaintiffs have reason to believe that Defendant PYN*Cnfashion Club, doing business as Infringing Websites stylesneaks.com and sharesneaker.us and sharesneaker.vip and sharesneakers.us and sharesneakers.vip and stockxpro.com and stockxpro.vip and stockxprovip.com and supersneakers.vip, and through the email address stylesneaks@gmail.com and sharesneakervip@gmail.com and stockxpro01@gmail.com, and the Infringing Social Media accounts 15659806542 (Whatsapp) and 85256109281 (Whatsapp) and 8615659806542

(Whatsapp) and UCsn9Ca6IOjScas9rIEeLrXA (YouTube) and stockxpro (YouTube) and stockxpro.usa (Instagram) and stockxprosneakers (Instagram) and stockxpro-vip-alice (Wechat) and r/StockxPro (Reddit) and r/fashionrep (Reddit) and r/stockxpro (Reddit) and u/stockxproservice (Reddit), is part of Network 23 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as stylesneaks.com has acted in conjunction with all the Network 23 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

146. Upon information and belief, the Network 23 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 23.”

147. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 23 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 23.”

Network 24 Defendants

148. Upon information and belief, Network 24 consists of 1 Infringing Website, 2 email addresses, and 8 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at

all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 24 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 24.”

149. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 24.

150. In order to uncover identifying information of the Network 24 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nike Sb Dunk Low “what the Dunk” sneakers, from the website timsneakers.com, which is part of Network 24. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

151. Plaintiffs have reason to believe that Defendant doing business as Infringing Website timsneakers.com, and through the email addresses vipcustomerservice1@gmail.com and hellotracy2018@qq.com, and through the Infringing Social Media accounts 8613015983512 (WeChat) and 8613015983512 (Whatsapp) and 8618650212083 (Whatsapp) and UCw_A-4QUn_CEKM8cfMQpjaQ (Youtube) and r/Timsneakers (Reddit) and r/timsneakers (Reddit) and timsneakerscom (Instagram) and u/timsneakers_com (Reddit), is part of Network 24 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as timsneaker.com has acted in conjunction with all the Network 24 Defendants, including the Infringing Websites, email

addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

152. Upon information and belief, the Network 24 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, listed in Exhibit 1 under the heading “Defendants – Network 24.”

153. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 24 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 24.”

Network 25 Defendants

154. Upon information and belief, Network 25 consists of 1 Infringing Website, 1 known Defendant names, and 2 email addresses, and 6 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 25 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 25.”

155. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social

media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 25.

156. In order to uncover identifying information of the Network 25 Defendants, on July 25, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Jordan 1 Retro Low Og Sp Travis Scott Black Phantom sneakers, from the website www.sneakerahead.org, which is part of Network 25. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

157. Plaintiffs have reason to believe that Defendant Casnda Corp Limited-B2C, doing business as Infringing Website ubuysneakers.com, and through the email addresses mislich@outlook.com and ubuysneakers@outlook.com, and the Infringing Social Media accounts 85264265446 (Whatsapp) and 85294300508 (Whatsapp) and r/UBuySneakers (Reddit) and r/ubuysneakers (Reddit) and u/ubuysneakers (Reddit) and ubuysneakers (Instagram), is part of Network 25 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as ubuysneakers.com has acted in conjunction with all the Network 25 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

158. Upon information and belief, the Network 25 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading "Defendants – Network 25."

159. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 25 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 25.”

Network 26 Defendants

160. Upon information and belief, Network 26 consists of 1 Infringing Website, 1 known Defendant name, 1 email address, and 2 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 26 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 26.”

161. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 26.

162. In order to uncover identifying information of the Network 26 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Air Jordan 1 Low OG AJ1 sneakers, from the website ulrica688.x.yupoo.com, which is part of Network 26. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

163. Plaintiffs have reason to believe that Defendant Bo Ying Trading Hong Kong Limited, doing business as Infringing Website ulrica688.x.yupoo.com, and through the email address 2101979609@qq.com, and the Infringing Social Media accounts 8617767113866 (Whatsapp) and 8617767113866 (Instagram), is part of Network 26 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as ulrica688.x.yupoo.com has acted in conjunction with all the Network 26 Defendants, including the Infringing Websites, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

164. Upon information and belief, the Network 26 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, listed in Exhibit 1 under the heading “Defendants – Network 26.”

165. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 26 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 26.”

Network 27 Defendants

166. Upon information and belief, Network 27 consists of 4 Infringing Websites, 3 email addresses, and 14 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of

counterfeiters (collectively, the “**Network 27 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 27.”

167. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 27.

168. In order to uncover identifying information of the Network 27 Defendants, on August 22, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Sacai x Nike LDWaffle Blue Multi sneakers, from the website bmlin.net, which is part of Network 27. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

169. Plaintiffs have reason to believe that Defendant doing business as Infringing Websites bmlin.net and hypeshoes.co and stockxkicks.com and wawone.com, and through the email addresses bmlinbella@gmail.com and hypeshoes.co3@gmail.com and stockxkicksvip@gmail.com, and the Infringing Social Media accounts 447594776750 (Whatsapp) and 85253806268 (Whatsapp) and 85267237597 (Whatsapp) and 8618039014337 (Whatsapp) and UCBvFg4ZvGFGDjGcjkhd__IA (YouTube) and UCvCL_rkEWJwi4V4lfzoWHZA (YouTube) and [hypeshoes.co](https://www.facebook.com/hypeshoes.co) (Facebook) and [bmlinshoes1](https://www.instagram.com/bmlinshoes1) (Instagram) and [hypeshoesco](https://www.instagram.com/hypeshoesco) (Instagram) and [love.nicekicks](https://www.instagram.com/love.nicekicks) (Instagram) and [lovekicks.vip](https://www.instagram.com/lovekicks.vip) (Instagram) and [stockx_kicks_](https://www.instagram.com/stockx_kicks_) (Instagram) and [r/HYPESHOES_co](https://www.reddit.com/r/HYPESHOES_co) (Reddit) and [r/Stockxkicks](https://www.reddit.com/r/Stockxkicks) (Reddit), is part of Network 27 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing

business as bmlin.net has acted in conjunction with all the Network 27 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

170. Upon information and belief, the Network 27 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 27.”

171. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 27 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 27.”

Network 28 Defendants

172. Upon information and belief, Network 28 consists of 2 Infringing Websites, 1 known Defendant names, and 5 email address, and 5 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 28 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 28.”

173. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 28.

174. In order to uncover identifying information of the Network 28 Defendants, on July 26, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Air Jordan 1 Royal Suede Dz5485-042 sneakers, from the website [footskick.ru](https://www.footskick.ru), which is part of Network 28. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

175. On July 25, 2023, Plaintiff's investigator purchased a Counterfeit Product, a pair of Nike Air Max 1 '86 Og Big Bubble Sport Red sneakers, from the website [clubkickz.ru](https://www.clubkickz.ru), which is another website part of Network 28. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

176. Plaintiffs have reason to believe that Defendant Star EFX Fashion Inc, doing business as Infringing Websites [footskick.ru](https://www.footskick.ru) and [clubkickz.ru](https://www.clubkickz.ru), and through the email addresses alan9527mand@outlook.com and clubkickz5@gmail.com and footskick2@gmail.com and yadonghuang693@outlook.com and yildizguney31@gmail.com, and the Infringing Social Media accounts 85260981515 (Whatsapp) and 8618086465089 (Whatsapp) and 861886465089 (WeChat) and 861886465089 (Whatsapp) and [footskicks8](https://www.instagram.com/footskicks8) (Instagram), is part of Network 28 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as [footskick.ru](https://www.footskick.ru) and [clubkickz.ru](https://www.clubkickz.ru) has acted in conjunction with all the Network 28 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth

in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

177. Upon information and belief, the Network 28 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 28.”

178. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 28 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 28.”

Network 29 Defendants

179. Upon information and belief, Network 29 consists of 1 Infringing Website, 1 known Defendant names, and 1 email address, and 1 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 29 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 29.”

180. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social

media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 29.

181. In order to uncover identifying information of the Network 29 Defendants, on July 18, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Pkgoden Sb Dunk Low Mummy sneakers, from the website coolkicksmall.com, which is part of Network 29. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

182. Plaintiffs have reason to believe that Defendant doing business as merchant account \$Kaideninc616 and Infringing Website coolkicksmall.com, and through the email address service@coolkicksmall.com, and Infringing Social Media account 8618959235127 (Whatsapp), is part of Network 29 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as coolkicksmall.com has acted in conjunction with all the Network 29 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

183. Upon information and belief, the Network 29 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading "Defendants – Network 29."

184. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 29 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and

distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 29.”

Network 30 Defendants

185. Upon information and belief, Network 30 consists of 2 Infringing Websites, 1 known Defendant names, and 4 email addresses, and 5 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 30 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 30.”

186. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 30.

187. In order to uncover identifying information of the Network 30 Defendants, on August 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of OFF WHITE x Nike Dunk SB Low DM1602-001 sneakers, from the website crewkick.net, which is part of Network 30. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

188. Plaintiffs have reason to believe that Defendant doing business as merchant account WTP*stepsupshoes and Infringing Website crewkick.net, and through the email addresses service@crewkick.net and crewkickofficial@gmail.com and info@crewkick.net and service@wintopay.com, and the Infringing Social Media accounts 18389001437 (Whatsapp) and

85252246012 (Whatsapp) and UCYxgYy8bBebOmC0X-v5YsDg (Youtube) and r/crewKickr3ps (Reddit) and u/crewKICK_ (Reddit), is part of Network 30 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as crewkick.net has acted in conjunction with all the Network 30 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

189. Upon information and belief, the Network 30 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 30.”

190. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 30 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 30.”

Network 31 Defendants

191. Upon information and belief, Network 31 consists of 1 Infringing Website, 2 known Defendant names, and 2 email addresses, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 31 Defendants**”). The

aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 31.”

192. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 31.

193. In order to uncover identifying information of the Network 31 Defendants, on July 26, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nike SB Blazer Low “Heaven” x Kevin Bradley sneakers, from the website dopesneaker.co, which is part of Network 31. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

194. Plaintiffs have reason to believe that Defendants Jiemaocommerce Co. Ltd. and Joom E-Commerce Company Limited, doing business as Infringing Website dopesneaker.co, and through the email addresses 3626967975@qq.com and dopesneakersale@hotmail.com, and the Infringing Social Media accounts 8618107269391 (WeChat) and 8618107269391 (Whatsapp) and dopesneaker.co (Instagram) and [dopesneakerco](https://dopesneakerco.com) (Instagram), is part of Network 31 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as dopesneaker.co has acted in conjunction with all the Network 31 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

195. Upon information and belief, the Network 31 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious

force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 31.”

196. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 31 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 31.”

Network 32 Defendants

197. Upon information and belief, Network 32 consists of 5 Infringing Websites, 3 known Defendant names, 3 email addresses, and 12 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 32 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 32.”

198. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 32.

199. In order to uncover identifying information of the Network 32 Defendants, on August 8, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nike Kobe 6 Pro

Reverse Grinch S7 sneakers, from the website flightkickz.com, which is part of Network 32.

This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

200. Plaintiffs have reason to believe that Defendants 志雄 祁, Chan Wai, and Bo Ying Trading Hongkong Limited, doing business as Infringing Websites flightkickz.cn, flightkickz.com, kicksgate.com, ln5factory.com, yzynation.com, and through the email addresses flightkickz@gmail.com, flightkickz2017@gmail.com, and qzxandy@163.com and the Infringing Social Media accounts 17477671215 (Whatsapp), 7477671215 (Whatsapp), 85255465409 (Whatsapp), 85255465492 (Whatsapp), 8615060357238 (Whatsapp), 9452646188 (Whatsapp), UCWqUfBzNE3aCVtMk45T75aw (YouTube), [fkz.plug](https://www.instagram.com/fkz.plug) (Instagram), [fkzonfire](https://www.instagram.com/fkzonfire) (Instagram), [ln5plug](https://www.wechat.com/fkzplug) (Wechat), [r/Flightkickz](https://www.reddit.com/r/Flightkickz) (Reddit), [r/flightkickz](https://www.reddit.com/r/flightkickz) (Reddit) is part of Network 32 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as flightkickz.com has acted in conjunction with all the Network 32 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

201. Upon information and belief, the Network 32 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 32.”

202. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 32 Defendants willfully infringed various valuable, federally

protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 32.”

Network 33 Defendants

203. Upon information and belief, Network 33 consists of 1 Infringing Website, 1 known Defendant names, and 2 email addresses, and 5 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 33 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 33.”

204. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 33.

205. In order to uncover identifying information of the Network 33 Defendants, on August 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Perfect Quality Dunk Low Pro SB “Freddy Krueger” sneakers, from the website gmkim.vn.ua, which is part of Network 33. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

206. Plaintiffs have reason to believe that Defendant Huijian Zheng (郑会见), doing business as Infringing Website gmkim.vn.ua, and through the email addresses huijian9023@foxmail.com

and noreply@ordernotify.net, and the Infringing Social Media accounts 639053615408 (Whatsapp) and 85266080171 (Whatsapp) and gmkrose (Instagram) and gmktina (WeChat) and r/gmksub (Reddit), is part of Network 33 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as gmkim.vn.ua has acted in conjunction with all the Network 33 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

207. Upon information and belief, the Network 33 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 33.”

208. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 33 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 33.”

Network 34 Defendants

209. Upon information and belief, Network 34 consists of 1 Infringing Website, 1 known Defendant names, and 2 email addresses, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a

closely-related network of counterfeiters (collectively, the “**Network 34 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 34.”

210. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 34.

211. In order to uncover identifying information of the Network 34 Defendants, on July 26, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nikev2k Runtekk White sneakers, from the website hotkickss.ru, which is part of Network 34. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

212. Plaintiffs have reason to believe that Defendant Joom E-Commerc Company Limited, doing business as Infringing Website hotkickss.ru, and email addresses hotkickss1977@hotmail.com and czspp2002@outlook.com, and through the Infringing Social Media accounts 85266617105 (Whatsapp) and chancy.green.52 (Facebook) and hot20023 (Instagram) and 852 5347 4599 (Phone), is part of Network 34 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as hotkickss.ru has acted in conjunction with all the Network 34 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

213. Upon information and belief, the Network 34 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 34.”

214. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 34 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 34.”

Network 35 Defendants

215. Upon information and belief, Network 35 consists of 5 Infringing Websites, 1 known Defendant names, and 1 email address, and 6 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 35 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 35.”

216. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 35.

217. In order to uncover identifying information of the Network 35 Defendants, on July 25, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Jordan 1 Retro Low Og Sp Travis Scott Reverse Mocha sneakers, from the website hypeboosts.ru, which is part of Network 35. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

218. Plaintiffs have reason to believe that Defendant EKO DG Trading Inc., doing business as Infringing Website hypeboosts.ru and hypeboost.ru and hypeboost.shop and hypeoost.store and hypeboosts.com, and through the email address ekodgtrading1@gmail.com, and the Infringing Social Media accounts 17079311942 (Whatsapp) and 85267335067 (Whatsapp) and hypeboosts (Instagram) and hypeboosts (WeChat) and r/hypeboosts (Reddit) and tejasrcpilot (Instagram), is part of Network 35 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as hypeboosts.ru has acted in conjunction with all the Network 35 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

219. Upon information and belief, the Network 35 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading "Defendants – Network 35."

220. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 35 Defendants willfully infringed various valuable, federally

protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 35.”

Network 36 Defendants

221. Upon information and belief, Network 36 consists of 2 Infringing Websites, 1 email address, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 36 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 36.”

222. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 36.

223. In order to uncover identifying information of the Network 36 Defendants, on July 18, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Ljr Travis Scott x Air Jordan 1 Low White Brownbarb Women’s sneakers, from the website jdfoot.co, which is part of Network 36. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

224. Plaintiffs have reason to believe that Defendant doing business as Infringing Websites jdfoot.co and clothswmall.com, and through the email address jdfootstore@gmail.com, and the

Infringing Social Media accounts 85253072903 (Whatsapp) and UC71kLLDhnW6aDGytprE2aPA (Youtube) and jdfootsneaker (Instagram) and jdfootstore (Instagram), is part of Network 36 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as jdfoot.co has acted in conjunction with all the Network 36 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 6, and including any individuals or entities whose actual names and addresses are currently unknown.

225. Upon information and belief, the Network 36 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 36.”

226. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 36 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 36.”

Network 37 Defendants

227. Upon information and belief, Network 37 consists of 1 Infringing Website, 2 known Defendant names, and 3 email address, and 1 Infringing Social Media account, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a

closely-related network of counterfeiters (collectively, the “**Network 37 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 37.”

228. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 37.

229. In order to uncover identifying information of the Network 37 Defendants, on August 22, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Air Jordan 1 Mid Banned Black/Red sneakers, from the website pkshoes.store, which is part of Network 37. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

230. Plaintiffs have reason to believe that Defendant One Pick (HK) Limited, doing business as the merchant account Vkomall, and through Infringing Website pkshoes.store, and email addresses pkshoes3@ordermail.org and pkshoes5@ordermail.org and service@ordermail.org, and through the Infringing Social Media account PK-Shoes-109037267542255 (Facebook), is part of Network 37 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as pkshoes.store has acted in conjunction with all the Network 37 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

231. Upon information and belief, the Network 37 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 37.”

232. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 37 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 37.”

Network 38 Defendants

233. Upon information and belief, Network 38 consists of 4 Infringing Websites, 2 known Defendant names, and 5 email addresses, and 2 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 38 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 38.”

234. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 38.

235. In order to uncover identifying information of the Network 38 Defendants, on July 23, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Born X Raised One Block at a Time sneakers, from the website popshoe.org, which is part of Network 38. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

236. Plaintiffs have reason to believe that Defendants Tongcheng Peina Department Store (通城佩娜百货店) and Bo Ying Trading Hong Kong Limited, doing business as merchant account PEINABAXNYJ, and as Infringing Websites popshoe.org and dunkskicks.org and jordankicks.org and popkicks.org, and through the email addresses emailbestyeezyshoes@gmail.com and emailpopkicksrep@gmail.com and emailpopsneakersrep@gmail.com and popshoeofficial@gmail.com and ren137303@gmail.com, and the Infringing Social Media accounts [popshoeofficial](https://www.instagram.com/popshoeofficial) (Instagram) and 3233025706 (Phone), is part of Network 38 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as popshoe.org has acted in conjunction with all the Network 38 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

237. Upon information and belief, the Network 38 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading "Defendants – Network 38."

238. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 38 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 38.”

Network 39 Defendants

239. Upon information and belief, Network 39 consists of 2 Infringing Websites, and 1 email address, and 6 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 39 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 39.”

240. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 39.

241. In order to uncover identifying information of the Network 39 Defendants, on August 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Jordan1 Retro High OG “Shattered Backboard 3.0” sneakers, from the website taosneakers.com, which is part of Network 39. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

242. Plaintiffs have reason to believe that Defendant doing business as Infringing Websites taosneakers.com and cnfashionclub.com, and through the email address taosneakers@gmail.com, and the Infringing Social Media accounts 8529286003 (Whatsapp) and 8618059868271 (Whatsapp) and UCjWueb4AHR6SYnsTcqRqBVg (Youtube) and accereps (Instagram) and rep.education.center (Instagram) and taosneakers_ins (Instagram), is part of Network 39 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as taosneakers.com has acted in conjunction with all the Network 39 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

243. Upon information and belief, the Network 39 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 39.”

244. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 39 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 39.”

Network 40 Defendants

245. Upon information and belief, Network 40 consists of 2 Infringing Websites, 1 email address, and 8 Infringing Social Media accounts, as well as other ABC Companies and John

Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 40 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 40.”

246. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 40.

247. In order to uncover identifying information of the Network 40 Defendants, on July 7, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Zoom Kobe 6 Protro “Grinch” sneakers, from the website uabat.xyz, which is part of Network 40. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

248. Plaintiffs have reason to believe that Defendant doing business as Infringing Websites uabat.xyz and uabatman.com, and through the email address liweiliu888@outlook.com, and the Infringing Social Media accounts 16466377762 (Whatsapp) and 8613607545746 (Whatsapp) and 8613666905331 (Whatsapp) and r/UaBat (Reddit) and r/uabat (Reddit) and u/uabat (Reddit) and [uabat.ru](https://www.instagram.com/uabat.ru) (Instagram) and [uabat0](https://www.instagram.com/uabat0) (Instagram), is part of Network 40 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as uabat.xyz has acted in conjunction with all the Network 40 Defendants, including the Infringing Websites, Infringing Social Media

accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

249. Upon information and belief, the Network 40 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 40.”

250. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 40 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 40.”

Network 41 Defendants

251. Upon information and belief, Network 41 consists of 1 Infringing Website, 1 known Defendant names, and 1 email address, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 41 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 41.”

252. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social

media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 41.

253. In order to uncover identifying information of the Network 41 Defendants, on July 26, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of PK God Batch Air Jordan 4 White Orange Womens sneakers, from the website pkstockx.cc, which is part of Network 41. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

254. Plaintiffs have reason to believe that Defendant doing business as merchant account \$Kaideninc616, and through Infringing Website pkstockx.cc, and through the email address service@pkstockx.com, and the Infringing Social Media accounts 19565163160 (Whatsapp) and UC7yOIAzmF xvSssIVYbfXBpw (Youtube) and [pkstock.x](https://www.instagram.com/pkstock.x) (Instagram) and [r/PKstockx](https://www.reddit.com/r/PKstockx) (Reddit), is part of Network 41 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as pkstockx.cc has acted in conjunction with all the Network 41 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

255. Upon information and belief, the Network 41 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading "Defendants – Network 41."

256. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 41 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 41.”

Network 42 Defendants

257. Upon information and belief, Network 42 consists of 1 Infringing Websites, 1 known Defendant names, and 2 email addresses, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 42 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 42.”

258. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 42.

259. In order to uncover identifying information of the Network 42 Defendants, on August 27, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of GOAT Air Jordan 5 Burgundy 2023 Mens sneakers, from the website sneakerwill.shop, which is part of Network 42. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

260. Plaintiffs have reason to believe that Defendant Putian Biyao Technology Co. Ltd (莆田百耀科技有限公司), doing business as Infringing Website sneakerwill.shop, and through the email address kailllsneakers@gmail.com and wsneakerwill@gmail.com, and the Infringing Social Media accounts 8617359409448 (Whatsapp) and 8618605016686 (Whatsapp) and r/WillSneakers (Reddit) and sneakerwillshop (Instagram), is part of Network 42 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as sneakerwill.shop has acted in conjunction with all the Network 42 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

261. Upon information and belief, the Network 42 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 42.”

262. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 42 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 42.”

Network 43 Defendants

263. Upon information and belief, Network 43 consists of 1 Infringing Website, 1 known Defendant name, 2 email addresses, and 4 Infringing Social Media accounts, as well as other

ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 43 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 43.”

264. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 43.

265. In order to uncover identifying information of the Network 43 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Air Jordan 3 White Cement Reimagined sneakers, from the website luckshoes.ru, which is part of Network 43. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

266. Plaintiffs have reason to believe that Defendant Liming Lin (丽明 林), doing business as Infringing Website luckshoes.ru, and through the email addresses comes2014@hotmail.com and buyshoesclothing88@gmail.com, and through Infringing Social Media accounts 8613529089262 (Whatsapp) and luckshoesru3 (Instagram) and r/luckshoesSneakers (Reddit) and u/luckshoes (Reddit), is part of Network 43 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as luckshoes.ru has acted in conjunction with all the Network 43 Defendants, including the Infringing Websites, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

267. Upon information and belief, the Network 43 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, listed in Exhibit 1 under the heading “Defendants – Network 43.”

268. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 43 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 43.”

Network 44 Defendants

269. Upon information and belief, Network 44 consists of 1 Infringing Website, 1 known Defendant name, and 2 email addresses, and 6 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 44 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 44.”

270. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 44.

271. In order to uncover identifying information of the Network 44 Defendants, on July 25, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of PK GOD Nike Air Max 97 Off-White Black sneakers, from the website perfectkicks.top, which is part of Network 44. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

272. Plaintiffs have reason to believe that Defendant Jianhui Liu (建辉刘), doing business as Infringing Website perfectkicks.top, and through the email address pkdoingthebest@gmail.com and pkdoingthebest11@outlook.com, and the Infringing Social Media accounts 18059533333 (Whatsapp) and 19959503333 (Whatsapp) and 8617759018888 (Whatsapp) and [pkdoingthebest2008](https://www.instagram.com/pkdoingthebest2008) (Instagram) and [r/PKDoingBest](https://www.reddit.com/r/PKDoingBest) (Reddit) and [u/PKDoingBest](https://www.reddit.com/user/PKDoingBest) (Reddit), is part of Network 44 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as perfectkicks.top has acted in conjunction with all the Network 44 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

273. Upon information and belief, the Network 44 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading "Defendants – Network 44."

274. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 44 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and

distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 44.”

Network 45 Defendants

275. Upon information and belief, Network 45 consists of 1 Infringing Website, 1 known Defendant name, and 2 email addresses, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 45 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 45.”

276. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 45.

277. In order to uncover identifying information of the Network 45 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Louis Vuitton x Nike Air Force 1 Triple White sneakers, from the website jaskicks.ru, which is part of Network 45. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

278. Plaintiffs have reason to believe that Defendant Xiaoqing Zhong (钟小青), doing business as Infringing Website jaskicks.ru, and through the email address jaskicks@outlook.com and zxq5790316@163.com, and the Infringing Social Media accounts 8613288881136 (Whatsapp) and [jaskicks2008](https://www.instagram.com/jaskicks2008) (Instagram) and [r/jaskicks2008](https://www.reddit.com/r/jaskicks2008) (Reddit) and [u/JASKicks2008](https://www.reddit.com/user/JASKicks2008)

(Reddit), is part of Network 45 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as jaskicks.ru has acted in conjunction with all the Network 45 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

279. Upon information and belief, the Network 45 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 45.”

280. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 45 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 45.”

Network 46 Defendants

281. Upon information and belief, Network 46 consists of 2 Infringing Websites, 2 known Defendant names, and 2 email addresses, and 2 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 46 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email

addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 46.”

282. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 46.

283. In order to uncover identifying information of the Network 46 Defendants, on July 26, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nikev2k Runtekk White sneakers, from the website coptop.ru, which is part of Network 46. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

284. Plaintiffs have reason to believe that Defendant Zhenqin Chen (陈珍琴), doing business as merchant account COPTOP through Infringing Websites coptop.ru and coptop.top, and through the email addresses coptopvip@gmail.com and copsneakers.top@gmail.com, and the Infringing Social Media accounts 85261546060 (Whatsapp) and coptop.top (Instagram), is part of Network 46 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as coptop.ru has acted in conjunction with all the Network 46 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

285. Upon information and belief, the Network 46 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as

well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 46.”

286. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 46 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 46.”

Network 47 Defendants

287. Upon information and belief, Network 47 consists of 1 Infringing Websites, 1 known Defendant names, and 2 email addresses, and 4 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 47 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 47.”

288. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 47.

289. In order to uncover identifying information of the Network 47 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Jordan 1 Retro High Off-

White Chicago sneakers, from the website m1sneakers.com, which is part of Network 47. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

290. Plaintiffs have reason to believe that Defendant Casnda Corp Limited-B2C, doing business as Infringing Website m1sneakers.com, and through the email addresses m1sneakers@outlook.com and 1053245683@qq.com, and the Infringing Social Media accounts 85269248974 (Whatsapp) and 85292478434 (Whatsapp) and m1sneakers (Facebook) and m1sneakers01 (Instagram), is part of Network 47 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as m1sneakers.com has acted in conjunction with all the Network 47 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

291. Upon information and belief, the Network 47 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 47.”

292. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 46 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 47.”

Network 48 Defendants

and belief, Defendant doing business as bomblines.la has acted in conjunction with all the Network 48 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

297. Upon information and belief, the Network 48 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 48.”

298. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 48 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 48.”

Network 49 Defendants

299. Upon information and belief, Network 49 consists of 1 Infringing Website, 2 email addresses, and 2 Infringing Social Media accounts, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 49 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 49.”

300. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 49.

301. In order to uncover identifying information of the Network 48 Defendants, on July 25, 2023, Plaintiffs' investigator purchased a Counterfeit Product, a pair of Air Jordan 1 Travis Scott Oliver sneakers, from the website ebuysneakers.com, which is part of Network 49. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

302. Plaintiffs have reason to believe that Defendant doing business as Infringing Website ebuysneakers.com, and through the email addresses sale@ebuysneakers.com and 870895201@qq.com, and the Infringing Social Media accounts ebuysneakers (Instagram) and 86138 5985 5080 (Phone), is part of Network 49 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as ebuysneakers.com has acted in conjunction with all the Network 49 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

303. Upon information and belief, the Network 49 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading "Defendants – Network 49."

304. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 49 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 49.”

Network 50 Defendants

305. Upon information and belief, Network 50 consists of 1 Infringing Website, 1 known Defendant name, and 1 email address, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 50 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 50.”

306. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 50.

307. In order to uncover identifying information of the Network 50 Defendants, on July 25, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Retro 85 AJ1 soles (Varsity Red) sneakers, from the website xylar.co, which is part of Network 50. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

308. Plaintiffs have reason to believe that Defendant SP Xylar Studio, doing business as Infringing Website xylar.co, and through the email address sales@xylar.co, is part of Network 50 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as xylar.co has acted in conjunction with all the Network 50 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

309. Upon information and belief, the Network 50 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 50.”

310. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 50 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 50.”

Network 51 Defendants

311. Upon information and belief, Network 51 consists of 2 Infringing Websites, 1 known Defendant name, and 1 email address, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 51 Defendants**”). The aliases and “d/b/a” names, including

Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 51.”

312. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 51.

313. In order to uncover identifying information of the Network 51 Defendants, on October 12, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Air Jordan 1 Mid Strawberries and Cream Women’s sneakers, from the website rsneakers.fun, which is part of Network 51. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

314. Plaintiffs have reason to believe that Defendant doing business as the merchant account \$DedianFang, and through Infringing Websites dmsneaker.com and rsneakers.fun, and through the email address rwindsneakers@outlook.com, is part of Network 51 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as rsneakers.fun has acted in conjunction with all the Network 51 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

315. Upon information and belief, the Network 51 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as

well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 51.”

316. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 51 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 51.”

Network 52 Defendants

317. Upon information and belief, Network 52 consists of 1 Infringing Website, 1 known Defendant name, and 1 email address, as well as other ABC Companies and John Does whose actual names and other identifying information are currently unknown, and who, at all relevant times herein, have acted in conjunction, as part of a closely-related network of counterfeiters (collectively, the “**Network 52 Defendants**”). The aliases and “d/b/a” names, including Infringing Websites, Infringing Social Media, and email addresses, that currently are known to be associated with these Defendants are listed in Exhibit 1 under the heading “Defendants – Network 52.”

318. These Infringing Websites and Infringing Social Media are all connected through a number of unique identifiers such as email addresses, website analytic information, and social media accounts that are controlled by one or more Defendants in the Network and is associated in a public manner with Network 52.

319. In order to uncover identifying information of the Network 52 Defendants, on September 29, 2023, Plaintiffs’ investigator purchased a Counterfeit Product, a pair of Nik(e) Blazer Recyclables Japanese Readymade sneakers, from the website solenlaces.com, which is part of

Network 52. This product was shipped to New York. Plaintiff has verified that this product is counterfeit.

320. Plaintiffs have reason to believe that Defendant doing business as Infringing Website solenlaces.com, and through the email address solenlaces21@gmail.com, is part of Network 52 and is an individual or entity whose, upon information and belief, actual name and address is currently unknown. Upon information and belief, Defendant doing business as solenlaces.com has acted in conjunction with all the Network 52 Defendants, including the Infringing Websites, Infringing Social Media accounts, email addresses, and names, as set forth in Exhibit 1, and including any individuals or entities whose actual names and addresses are currently unknown.

321. Upon information and belief, the Network 52 Defendants have made a conscious decision to join in a conspiracy to market and sell Counterfeit Products and are the moving and conscious force behind the operation of the fully interactive, commercial websites available at the URLs as well as other online platforms, including social media sites listed in Exhibit 1 under the heading “Defendants – Network 52.”

322. By selling and offering to sell Counterfeit Products to the consuming public through the Infringing Platforms, the Network 52 Defendants willfully infringed various valuable, federally protected Nike and Converse trademarks in connection with the sale, offering for sale, and distribution of the specific types of goods set forth in Exhibit 6 under the heading “Defendants – Network 52.”

ABC Company and John Doe Defendants

323. Upon information and belief, ABC Companies 1-100 are companies engaged in the manufacture, distribution, sale and advertisement of Counterfeit Products, but whose identity and number are not presently known.

324. Upon information and belief, John Does 1-100 are individuals who are consciously engaged in directing, controlling, ratifying, or otherwise participating in the manufacture, distribution, sale, and advertisement of Counterfeit Products, or who consciously and directly benefit financially from the manufacture, distribution, sale, and advertisement of Counterfeit Products, but whose identity and numbers are presently unknown.

325. Upon information and belief, the Defendants operate, and will operate, additional Infringing Websites that are not currently known to Plaintiffs but that may become known to Plaintiffs at a later date. Upon information and belief, the Defendants operate, and will operate, additional Infringing Social Media that are not currently known to Plaintiffs but that may become known to Plaintiffs at a later date. Upon information and belief, Defendants use, and will use, additional email addresses that are not currently known to Plaintiffs but that may become known to Plaintiffs at a later date. Upon information and belief, Defendants use, and will use, additional aliases that are not currently known to Plaintiffs but that may become known to Plaintiffs at a later date. Plaintiffs' investigation of Defendants' unlawful conduct is ongoing, and Plaintiffs expect to identify other of Defendants' Infringing Websites, Infringing Social Media, email addresses and aliases.

JURISDICTION AND VENUE

326. This action arises under the Trademark Act of 1946, 15 U.S.C. § 1051, et seq., as amended by the Trademark Counterfeiting Act of 1984, Pub. L. 98-473 (Oct. 12, 1984), the Anticybersquatting Consumer Protection Act of 1996, Pub. L. 104-153 (July 2, 1996), and the Prioritizing Resources and Organization for Intellectual Property Act of 2007, H.R. 4279 (Oct. 13, 2008) (the "**Lanham Act**"), and the laws of the State of New York.

327. This Court has jurisdiction under 15 U.S.C. § 1121(a) and 28 U.S.C. §§ 1331, 1338(a) and 1338(b). This Court has supplemental jurisdiction over all other claims asserted herein under 28 U.S.C. § 1367(a).

328. Personal jurisdiction is proper over all Defendants pursuant to N.Y.C.P.L.R. § 302(a) because each of the Defendants regularly conducts, solicits, or transacts business in New York and in this District. Jurisdiction is also proper because Defendants have offered to sell and have sold Counterfeit Products to consumers within New York and this District; Defendants have solicited consumers within New York and this District; Defendants have entered into agreements with consumers and businesses within New York and this District; Defendants derive substantial revenue in interstate and/or international commerce; and because Defendants regularly and systematically direct electronic activity into the State of New York through their fully interactive websites with the manifest intent of engaging in business within New York and this District; and because the unlawful, tortious conduct complained of herein has caused, and continues to cause, injury to Plaintiff within New York and this District.

- a. Upon information and belief, Defendants were and/or are systematically directing and/or targeting their business activities at consumers in the United States, including New York, through the Infringing Platforms as well as any and all as yet undiscovered Infringing Platforms, through which consumers in the United States, including New York, can view the one or more Infringing Websites or Infringing Social Media that each Defendant operates, uses to communicate with Defendants regarding their listings for Counterfeit Products and to place orders for, receive invoices for and purchase Counterfeit Products for delivery in New

York, as a means for establishing regular business with the U.S., including New York.

- b. Upon information and belief, Defendants are sophisticated sellers, each operating one or more commercial businesses through their respective Networks, using their Infringing Platforms and related operations to manufacture, import, export, advertise, market, promote, distribute, offer for sale, sell and/or otherwise deal in products, including the Counterfeit Products to consumers worldwide, including to consumers in the United States, and specifically in New York.
- c. Upon information and belief, a majority of Defendants' Infringing Websites reflect multiple sales to consumers all over the world, including repeat sales to consumers in the United States.
- d. Upon information and belief, all Defendants accept payment in U.S. Dollars and offer shipping to the U.S., including to New York.
- e. Upon information and belief, Defendants have transacted, business with consumers located in the United States, for the sale and shipment of Counterfeit Products to New York.
- f. Upon information and belief, Defendants are aware of Nike, its Nike Products and Nike Marks, and are aware that their illegal counterfeiting and infringing actions alleged herein are likely to cause injury to Nike in the U.S. and specifically, in New York, as Nike conducts substantial business in New York.
- g. Upon information and belief, Defendants are aware of Converse, its Converse Products and Converse Marks, and are aware that their illegal counterfeiting and infringing actions alleged herein are likely to cause injury to Converse in the U.S.

and specifically, in New York, as Converse conducts substantial business in New York.

329. Venue is proper, inter alia, pursuant to 28 U.S.C. § 1391(b)(2) because a substantial part of the events giving rise to these claims arose in this District and customer confusion is likely to occur in this District.

PLAINTIFFS' BUSINESS AND MARKS




330. As described further below, the Nike and Converse brands are enormously popular with the general public, both in the United States and worldwide. Plaintiffs' advertising, promotional, and marketing efforts have resulted in widespread and favorable public acceptance and recognition of the Nike and Converse trademarks.

331. Plaintiffs' Marks appear on genuine Nike and Converse Products (either on their labels, packaging, on the products themselves, or in the design of the products) and in their respective advertising and promotional materials. Based on the extensive sales of Plaintiffs' Products and their wide popularity, Plaintiffs' Marks are either inherently distinctive or have developed a secondary meaning and significance in the minds of the purchasing public, and the purchasing public immediately identifies the services and products utilizing and/or bearing such trademarks with Plaintiffs.


332. To ensure consumer satisfaction, genuine Nike and Converse Products are subject to strict quality control guidelines prior to distribution and sale. The enforcement of these guidelines has caused consumers, potential consumers, and other members of the public to associate Plaintiffs' Products with high quality materials, style and workmanship. Consequently, Plaintiffs have created invaluable goodwill throughout the United States and elsewhere by selling products of dependable quality.




Nike's Business and Marks




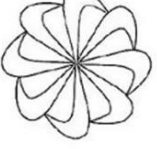

333. Nike is the owner of the right, title and interest in and to, inter alia, the following well-established trademarks registered with the United States Patent and Trademark Office (the “Nike Marks”) which appear on the Infringing Websites:


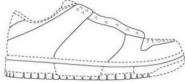
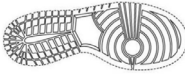






Title	Classes	Status/Status Date	Registration Number	Trademark Design
ACG with Swoosh & Triangles Design* ¹	25- footwear	Registered And Renewed 5/17/2018	2164358	
ACG Nike & Triangle Design*	25- footwear	Registered And Renewed 5/25/2018	2117273	
Swoosh over Air Design*	25- Clothing, footwear, headgear	Registered And Renewed 2/21/2017	2068075	
AIR FLIGHT	25- footwear	Registered And Renewed 4/29/2023	1686515	
AIR FORCE I	25- footwear	Registered And Renewed 10/16/2018	3520484	AIR FORCE I
Air Jordan & Wings Design*	25- Clothing, footwear, headgear	Registered And Renewed 2/2/2020	3725535	
AIR JORDAN	25- Clothing, footwear	Registered And Renewed 1/25/2016	1370283	
AIR MAX	25- footwear	Registered And Renewed 2/9/2018	1508348	



¹ * indicates unofficial, descriptive title.







Title	Classes	Status/Status Date	Registration Number	Trademark Design
AIR TRAINER MAX	25- footwear	Registered And Renewed 9/27/2013	1789463	
AIR270	25- footwear	Registered 8/11/2020	6124768	AIR270
AIR-SOLE	25 - insoles	Registered and Renewed 3/31/2021	1145812	
Coil Design*	25- footwear	Registered And Renewed 6/17/2023	2584382	
CORTEZ	25- footwear	Registered And Renewed 6/10/2015	1027021	
DRI-FIT	25- Clothing, headgear 28 – Sporting goods	Registered And Renewed 9/16/2022	2571314	DRI-FIT
DRI-FIT	25- Clothing	Registered And Renewed 2/5/2015	1887959	
DRI-FIT	25- Clothing	Registered And Renewed 4/5/2023	1794058	
DUNK	25- footwear	Registered and Renewed 10/30/2020	3780236	DUNK
ELITE	25- footwear	Registered And Renewed 2/17/2022	1173359	


Title	Classes	Status/Status Date	Registration Number	Trademark Design
FLIGHT	25- Clothing	Registered And Renewed 1/7/2015	2910530	
FLYEASE	25 - footwear	Continued Use And Incontestability Accepted 2/28/2023	5244829	
FLYKNIT	25- footwear	Continued Use And Incontestability Accepted 10/8/2019	4393310	FLYKNIT
FLYWIRE	25- footwear	Registered And Renewed 1/21/2020	3640542	FLYWIRE
JUMPMAN	25- Clothing, footwear, headgear	Registered And Renewed 1/10/2020	3627820	JUMPMAN
JumpMan Design	25- Clothing, footwear, headgear 18- Leather and imitations of leather	Registered And Renewed 5/10/2023	1742019	
JumpMan Design	25- Clothing, footwear	Registered And Renewed 3/6/2020	1558100	
JumpMan Design	28 - basketballs	Registered and Renewed 5/17/2018	3428287	
JUST DO IT	25- Clothing, footwear, headgear 18- Leather and imitations of leather	Continued Use And Incontestability	4764071	JUST DO IT





Title	Classes	Status/Status Date	Registration Number	Trademark Design
		Accepted 9/1/2021		
JUST DO IT	9- Cell phone cases and accessories; eyewear; sunglasses;	Continued Use And Incontestability Accepted 9/1/2021	4704671	JUST DO IT
JUST DO IT.	25- Clothing, headgear	Registered And Renewed 12/19/2014	1875307	
KD Design*	25- Clothing, footwear 18- Leather and imitations of leather	Continued Use And Incontestability Accepted 9/11/2020	4462766	
LeBron Logo*	28- Sports balls; basketballs 25- Clothing, footwear, headgear 18- Leather and imitations of leather	Registered and Renewed 6/30/2023	4254513	
Logo Mark	25- footwear	Registered and Renewed 12/26/2019	5820374	
Swoosh Spiral Design*	25- footwear	Registered and Renewed 9/30/2020	3833438	
AirMax 95 Body Design*	25- footwear	Registered And Renewed 10/26/2019	3714300	



Title	Classes	Status/Status Date	Registration Number	Trademark Design
Logo Mark	25- footwear	Registered And Renewed 8/6/2019	3711303	
Logo Mark	25- footwear	Registered And Renewed 12/26/2019	3711305	
Single Sole*	25- footwear	Registered And Renewed 12/26/2019	3721064	
Swoosh Spiral Shaded Design*	25- Clothing	Registered and Renewed 10/9/2020	3826832	
Logo Mark	25- footwear	Registered And Renewed 6/22/2018	3451907	
Logo Mark	25- footwear	Registered And Renewed 6/22/2018	3451906	
Double Sole*	25- footwear	Registered And Renewed 6/22/2018	3451904	
Logo Mark	25- footwear	Registered And Renewed 6/22/2018	3451905	
LUNARLON	25- footwear 17-Padding and cushioning materials	Registered And Renewed 8/31/2021	3962725	LUNARLON
M Design*	25- Clothing, footwear, headgear	Registered 9/13/2022	6846912	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
Melo Design*	25- Clothing, footwear	Registered And Renewed 3/25/2019	3580156	
MERCURIAL	25- footwear 18- Leather and imitations of leather	Registered And Renewed 3/27/2023	4210496	MERCURIAL
MERCURIAL SUPERFLY	25- footwear	Continued Use And Incontestability Accepted 2/28/2021	4645381	MERCURIAL SUPERFLY
METCON	25- footwear	Registered 4/10/2018	5440973	METCON
Nadal Design*	25- Clothing, footwear, headgear	Registered And Renewed 8/30/2022	4112206	
NIKE	9- Cell phone cases and accessories; eyewear; sunglasses;	Continued Use And Incontestability Accepted 7/21/2021	4704670	NIKE
NIKE	9- eyewear; sunglasses;	Registered And Renewed 5/24/2015	3081688	NIKE
NIKE	14- Precious metals and their alloys; jewelry, precious stones	Registered And Renewed 2/27/2018	2196735	
NIKE	25- Clothing	Registered And Renewed 12/23/2015	1945654	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
Nike Over Swoosh Design*	25- footwear	Registered And Renewed 2/10/2017	2104329	
Nike & Swoosh Design*	18- Leather and imitations of leather	Registered And Renewed 9/29/2023	1772987	
Nike & Swoosh Design*	25- Clothing, headgear	Registered And Renewed 9/29/2023	1237469	
NIKE	25- Clothing, headgear	Registered And Renewed 4/14/2014	1277066	
NIKE	25- footwear	Registered And Renewed 12/17/2022	1214930	
Nike & Swoosh Design*	25- footwear	Registered And Renewed 12/10/2014	1325938	
Nike & Swoosh Design	28 – sports balls	Registered and Renewed 2/13/2017	2024436	
NIKE	18- Leather and imitations of leather	Registered And Renewed 8/31/2021	1153938	
NIKE	25- Clothing, footwear, headgear	Registered And Renewed 1/17/2014	0978952	
NIKE	28 – sports balls	Registered and Renewed 12/23/2016	2025926	
Nike Air & Swoosh Design*	25- Clothing	Registered And Renewed 5/9/2019	1571066	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
NIKE AIR	25- footwear	Registered And Renewed 8/15/2014	1307123	
Nike Air Slanted & Swoosh Design*	25- footwear	Registered And Renewed 6/27/2014	1284386	
NIKE AIR VAPORMAX	25- footwear	Continued Use And Incontestability Accepted 2/13/2024	5286596	NIKE AIR VAPORMAX
NIKE FREE	25- footwear	Registered And Renewed 2/9/2017	3192901	NIKE FREE
NIKE LUNAR	25- footwear	Continued Use And Incontestability Accepted 4/14/2022	4901503	NIKE LUNAR
NIKE SHOX	25- footwear	Registered And Renewed 4/1/2015	2970902	NIKE SHOX
NIKE VAPOR	25- Clothing, footwear, headgear	Continued Use And Incontestability Accepted 8/11/2022	5144112	NIKE VAPOR
NIKECONNECT Logo	9 - near field communication (NFC) tags for identifying and tracking products 25 – clothing incorporating near field	Registered 10/6/2020	6171435	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
	communication (nfc) technology			
NIKEFREE	25- footwear	Registered And Renewed 7/19/2016	3087455	NIKEFREE
NIKESKIN	25- footwear	Continued Use And Incontestability Accepted 1/28/2023	5003579	NIKESKIN
PRESTO	25- footwear	Registered And Renewed 9/30/2023	2716140	PRESTO
SWOOSH	25- Clothing	Registered And Renewed 2/26/2018	2164810	
SWOOSH	25- footwear	Registered And Renewed 10/25/2022	1200529	
Swoosh Design*	9- Cell phone cases and accessories; eyewear; sunglasses;	Continued Use And Incontestability Accepted 7/21/2021	4704672	
Swoosh Design*	25- Clothing	Registered And Renewed 10/30/2015	1990180	
Swoosh Design*	25- Clothing, headgear	Registered And Renewed 6/27/2014	1284385	
Swoosh Design*	25- footwear	Registered And Renewed 2/17/2015	1323343	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
Swoosh on Phantom Shoe*	25- footwear	Registered And Renewed 2/3/2015	1323342	
Swoosh w/ Rectangle Design*	25- Clothing, footwear, headgear 18- Leather and imitations of leather	Registered 9/15/2020	6154051	
TAILWIND	25- Clothing, headgear	Registered And Renewed 9/19/2015	1933600	
TAILWIND	25- footwear	Registered And Renewed 8/31/2021	1153237	
TECHKNIT	25- Clothing, headgear	Registered 3/19/2019	5700611	TECH KNIT
THERMA-FIT	25- Clothing	Registered And Renewed 4/5/2014	1839775	
TIEMPO	25- footwear	Registered And Renewed 3/24/2023	4210491	TIEMPO
TRIAX	25- footwear	Registered And Renewed 1/14/2014	2810679	
VAPORMAX	25- footwear	Registered 6/26/2018	5503242	VAPORMAX
VOMERO	25- footwear	Continued Use And Incontestability Accepted 8/23/2022	4908872	VOMERO

Title	Classes	Status/Status Date	Registration Number	Trademark Design
WAFFLE	25 - footwear	Registered and Renewed 4/2/2014	1276233	

334. Registrations for the trademarks set forth above are valid, subsisting, unrevoked, and uncanceled. Additionally, many of Nike's registrations have achieved incontestable status pursuant to 15 U.S.C. § 1065. Nike also owns common law rights in the above and other trademarks for use in connection with the Nike Products.

335. The Nike Marks are in full force and effect. Nike has built substantial goodwill in the Nike Marks and has never abandoned that good will. The most valuable, and most frequently imitated, Nike Trademarks are famous marks as that term is used in 15 U.S.C. § 1125(c)(1), and all of the Nike Trademarks have been continuously used and never abandoned. The innovative marketing and product design of the Nike Products have enabled Nike to achieve widespread recognition and fame and have made the Nike Marks some of the most well-known marks in the athletic apparel and footwear industry, if not all industries. The widespread fame, outstanding reputation, and significant goodwill associated with the Nike brand has made the Nike Marks invaluable assets.

336. Nike intends to continue to preserve and maintain its rights with respect to the Nike Marks. Nike has continuously used the Nike Marks in interstate commerce in connection with the sale, distribution, promotion, and advertising of genuine Nike Products since their respective dates of first use as noted on the federal trademark registration certificates.

337. Since its founding in 1964, Nike has designed, advertised, offered for sale, and sold footwear and related products, including apparel, accessories, and equipment. Among other things, Nike markets and sells athletic footwear, apparel and sporting goods for men, women,

and children. Nike athletic footwear is generally designed for specific athletic use, such as running, basketball, and soccer.

338. Today, Nike is a multi-billion dollar brand and is the world's leading designer, marketer, and distributor of athletic footwear and apparel products which are marked with the famous Nike trademarks. In addition to spending significant amounts in support of advertising and promotion of the Nike Products, Nike conducts successful marketing campaigns across various social media platforms, including Facebook, Twitter, YouTube, Instagram, TikTok, and Snapchat, in an effort to further promote the Nike Marks and Nike Products.

339. Given the success of the brand, Nike spends considerable resources to market advertise, and protects its brand. To maintain the quality and integrity associated with authentic Nike Products, Nike controls and limits the distribution of goods authorized to bear the Nike Marks. Authentic Nike Products are distributed through authorized online and brick-and-mortar retailers, distributors, and licensees, as well as Nike-owned websites and retail stores, such as the Nike NYC store on Manhattan's Fifth Avenue. Sales of Nike Products via the Nike.com website are significant. The Nike.com website features proprietary content, images and designs exclusive to the Nike brand.

340. Among the purchasing public, both in the United States and around the world, genuine Nike Products are instantly recognizable as high quality, innovative, and dependable. The Nike Marks identify, in the United States and throughout the world, high quality products designed and manufactured by Nike.




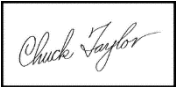

341. The widespread popularity of Nike Products has resulted in the Nike Marks having developed a significance in the minds of the purchasing public, and the purchasing public

immediately identifies the services and products utilizing and/or bearing such trademarks with Nike.

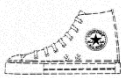
Converse's Business and Marks



342. Converse is the owner of the right, title and interest in and to, *inter alia*, the following well-established trademarks registered with the United States Patent and Trademark Office (the "**Converse Marks**") which appear on the Infringing Websites:






Title	Classes	Status/Status Date	Registration Number	Trademark Design
ALL STAR	25 - footwear	Registered And Renewed 2/8/2014	2807854	
ALL STAR	25 – athletic shoes	Registered And Renewed 7/19/2019	369971	
ALL STAR	18 – sports bags	Registered And Renewed 4/21/2014	1275191	
ALL STAR	25 - shirts	Registered And Renewed 5/6/2014	1276236	
ALL STAR	25 - footwear	Registered And Renewed 5/19/2021	1146876	







Title	Classes	Status/Status Date	Registration Number	Trademark Design
ALL STAR	25 - clothing	Registered And Renewed 6/24/2016	1981319	
ALL STAR	25 - clothing	Registered And Renewed 6/15/2021	2435789	
CX Design	25 - boots and shoes	Registered And Renewed 6/4/2018	121760	
CHUCK 70	25 - footwear	Registered 4/9/2019	5722153	
CHUCK TAYLOR (Signature)	25 - clothing	Registered And Renewed 7/1/2014	2856926	
CHUCK TAYLOR	25 - footwear; clothing, headgear	Registered And Renewed 11/24/2018	3534741	
CHUCK TAYLOR (Signature)	25 - shoes	Registered And Renewed 7/28/2014	315273	


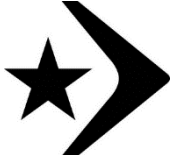



Title	Classes	Status/Status Date	Registration Number	Trademark Design
CONS	25 – footwear	Registered And Renewed 6/1/2018	1493265	
CONS	25 – clothing, headwear	Registered And Renewed 1/31/2024	1790496	
CONVERSE	9 – eyeglasses	Registered And Renewed 4/9/2014	2869353	
CONVERSE	16 – books, pens 18 – book bags	Registered And Renewed 11/22/2021	2466322	
CONVERSE	18 – sports bags	Registered And Renewed 8/9/2014	2872822	
CONVERSE	25 – clothing, footwear	Registered And Renewed 5/23/2019	868375	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
CONVERSE	25 – socks	Registered And Renewed 2/8/2014	2810717	
CONVERSE	26 – shoes laces	Registered And Renewed 7/8/2017	3289613	
CONVERSE	25 – clothing, headwear	Registered And Renewed 12/22/2014	1868363	
CONVERSE	35 – retail store services	Registered And Renewed 11/19/2016	3175430	
CONVERSE.COM	42 – computer services	Registered And Renewed 9/23/2021	2453856	
CONVERSE CHUCK TAYLOR ALL STAR Ankle Design	25 – footwear	Registered And Renewed 6/1/2018	1490262	


Title	Classes	Status/Status Date	Registration Number	Trademark Design
CONVERSE CHUCK TAYLOR ALL STAR	18 – sports bags	Registered And Renewed 1/17/2023	1738330	
CONVERSE CHUCK TAYLOR ALL STAR	18 – book bags	Registered And Renewed 11/22/2021	2466301	
CONVERSE CHUCK TAYLOR ALL STAR	25 – footwear	Registered And Renewed 9/12/2020	1138469	
CONVERSE CHUCK TAYLOR ALL STAR	25 – clothing	Registered And Renewed 2/7/2015	1877671	
CONVERSE CHUCK TAYLOR ALL STAR	25 – t- shirts	Registered And Renewed 6/15/2021	2435788	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
CONVERSE CHUCK TAYLOR ALL STAR	25 – headwear	Registered And Renewed 6/5/2017	2063154	
CONVERSE ALL STAR License Plate Design	25 – clothing, footwear	Registered And Renewed 7/7/2017	2098296	
CONVERSE Star in Box Design	25 – footwear	Registered And Renewed 7/7/2017	1078480	
CONVERSE to the Right of Star in Box Design (Bordered)	25 – footwear	Registered And Renewed 5/13/2021	1138468	
CONVERSE to the Right of Star in Box Design (Bordered)	25 – footwear	Registered And Renewed 3/23/2022	924169	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
CONVERSE with Star Inside of O Design	25 – footwear, clothing	Registered And Renewed 2/4/2022	1654951	
CONVERSE with Star Inside of O	25 – clothing, headwear	Registered And Renewed 11/14/2013	1804563	
FIRST STAR	25 – footwear	Registered And Renewed 1/21/2017	3191460	
Five-Pointed Star Design	25 – footwear	Registered And Renewed 2/9/2023	741662	
JACK PURCELL (Signature)	25 - footwear	Registered And Renewed 11/15/2013	583097	
JACK PURCELL (Signature)	25 – footwear, clothing, headwear	Registered And Renewed 1/31/2018	3481708	
JACK PURCELL (signature 1) with Triangle	25 – footwear	Registered And Renewed 2/21/2023	938918	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
ONE STAR & Design	25 – footwear	Registered And Renewed 12/22/2014	1868414	
RUBBER TRACKS	41 – recording studio services	Continued Use And Incontestability Accepted 11/18/2019	4417013	
SKIDGRIP	25 - footwear	Registered And Renewed 1/20/2023	1206260	
Star and Chevron Design (Curved)	25 – footwear	Registered And Renewed 7/20/2015	2973804	
Star and Chevron Design	25 – shirts	Registered And Renewed 1/14/2023	1215935	
Star and Chevron Design	25 - socks	Registered And Renewed 3/18/2019	1525779	
Star and Chevron Placement on Shoe Silhouette	25 – footwear	Registered And Renewed 11/18/2016	1053338	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
STAR PLAYER	25 – footwear	Registered And Renewed 11/6/2020	3847775	
Two Stripe Midsole Design	25 – footwear	Registered And Renewed 2/4/2024	4398753	
Three Dimensional Sole of Shoe Design	25 - footwear	Registered And Renewed 4/3/2020	1588960	
Three Dimensional Tread Design	25 – footwear	Registered And Renewed 7/17/2017	3258103	
Shoe Toe Design	25 - footwear	Registered And Renewed 9/9/2016	1998884	
Sole of a Shoe Design	25 - footwear	Registered And Renewed 2/20/2022	1658256	
Star in Box Design	25 – footwear	Registered And Renewed 12/29/2021	1632413	

Title	Classes	Status/Status Date	Registration Number	Trademark Design
Star in Circle (Dashed) Design	25 – footwear	Registered And Renewed 1/31/2024	1789476	
WEAPON	25 - footwear	Registered And Renewed 8/11/2023	2683548	

343. Registrations for the trademarks set forth above are valid, subsisting, unrevoked, and uncancelled. Additionally, many of Converse’s registrations have achieved incontestable status pursuant to 15 U.S.C. § 1065. Converse also owns common law rights in the above and other trademarks for use in connection with the Converse Products.

344. The Converse Marks are in full force and effect. Converse has never abandoned the Converse Marks, nor has Converse ever abandoned the goodwill of its business in connection with the Converse Marks. Converse intends to continue to preserve and maintain its rights with respect to the Converse Marks.

345. Founded in 1908, Converse is engaged in the design, distribution, and sale of sneakers, skating shoes, lifestyle brand footwear, apparel, and accessories, which are offered for sale all over the world and throughout the United States.

346. In 1917, Converse’s predecessor-in-interest introduced a high-top basketball shoe that would eventually be known as the “Chuck Taylor All Star.” In 1946, Converse’s predecessor redesigned the “patch” located on the ankle of the Chuck Taylor All Star high-top shoe. Later, in

1962, the same entity introduced a “low-cut” version of the Chuck Taylor All Star. The same outsole pattern has remained substantially the same since its initial use in 1920.

347. The Converse brand is a multi-billion-dollar brand. In the past decade, Converse has earned billions of dollars in revenue from sales of Converse Products in the United States alone. Converse branded products have become enormously popular and even iconic, driven by Converse’s high quality standards and innovative design. Among the purchasing public, genuine Converse Products are instantly recognizable as such. In the United States and around the world, the Converse brand has come to symbolize high quality, and Converse Products are among the most recognizable footwear, apparel and accessories in the world.

348. The success of the Converse Products and the Converse Trademarks has been covered in many media outlets. For example, two books—CHUCKS!: THE PHENOMENON OF CONVERSE CHUCK TAYLOR ALL STARS and CHUCK TAYLOR, ALL STAR: THE TRUE STORY OF THE MAN BEHIND THE MOST FAMOUS ATHLETIC SHOE IN HISTORY—have focused on the popularity of the Converse Products. Additionally, a number of celebrities have collaborated with Converse to release special edition Converse Products, including John Lennon, Jimi Hendrix, Kurt Cobain, John Varvatos, The Ramones, Dr. Seuss, Gorillaz and Comme des Garçons, to name a few. Recently, Vice-President Kamala Harris has worn Converse shoes while on the campaign trail, garnering additional media attention.

349. The widespread popularity of the Converse Products has resulted in the Converse Marks having developed a secondary meaning and significance in the minds of the purchasing public, and the purchasing public immediately identifies the services and products utilizing and/or bearing such trademarks with Converse.


THE COUNTERFEIT PRODUCTS

350. The success of the Nike and Converse brands has made them a prime target for counterfeiting. In this action alone, Plaintiffs have identified that Defendants are operating at least 98 Infringing Websites and 267 Infringing Social Media accounts, advertising and selling Counterfeit Products.

351. Defendants, without any authorization or license from Plaintiffs, have willfully and intentionally used, reproduced and/or copied the Nike and Converse Marks in connection with manufacturing, distributing, exporting, importing, advertising, marketing, selling and/or offering to sell Counterfeit Products. Defendants advertise, offer to sell, and sell Counterfeit Products to both New York and United States consumers via the Internet through hundreds of unauthorized Infringing Websites and advertising on Infringing Social Media. Defendants have shipped at least certain of the Counterfeit Products into the State of New York and this District.


352. The vast majority of Defendants' Infringing Websites contain either vague or completely false statements as to the authenticity of the products being offered for sale. Others claim to sell "unauthorized authentic" Nike or Converse Products that are, in reality, Counterfeit Products. In other cases, Defendants' Infringing Websites freely admit that the products being offered for sale are "replica" versions of Nike or Converse Products, with "replica" being a common euphemism used to describe counterfeit goods.

353. Defendants' manufacturing, advertisement, distribution, and sale of Counterfeit Products will result in consumers being deceived and misled into believing that Defendants' products or activities are authorized or sponsored by Plaintiffs, or to cause mistake or deception either at the point of sale or post-sale when consumers, or potential consumers, see the Counterfeit Products in use.

354. For example, shown below on the left is an image of an authentic pair of Nike Air Force 1 High LV8 3 Big Kids’ Shoes. The image of the authentic Nike Product displayed below bears the federally registered Swoosh Design trademark  (U.S. Reg. No. 1323343). Shown on the right is an image of a Counterfeit Product offered for sale by the Defendant in Network 2 through the website bstsnakers.com, and described by Defendants as “Nike Air Force 1 High Flax (2019) CJ9178-200.” The Counterfeit Product has ornamentation, design and labeling that are intended to appear like the ornamentation, design and labeling on the authentic Nike Product. The overall effect of the Counterfeit Product is not only confusingly similar to the design of the authentic product on the left, it also bears an exact copy of Nike’s federally registered Swoosh Design.



355. Similarly, shown below is an image of a listing for “Converse Chuck 70 Hi Black Egret 162050C” for \$79.00 from bstsnaker.com which is a part of Defendant Network 2. The listing for the Counterfeit Product shows ornamentation, design and labeling that are intended to appear like the ornamentation, design and labeling in the authentic Converse Product. The overall effect of the Counterfeit Product is not only confusingly similar to the design of the authentic product

on the left, it also bears an exact copy of Converse’s federally registered Converse Chuck Taylor All Star trademark  (U.S. Reg. No. 1138469).



356. All of the Defendants’ Counterfeit Products follow the pattern described above—each copies the ornamentation, design and/or labeling of an authentic Nike or Converse Product and most bear exact copies of one or more of the Plaintiffs’ Marks. Through their Infringing Websites and Infringing Social Media, Defendants offer for sale thousands of such Counterfeit Products falsely labeled as “Nike” or “Converse.” Defendants offer their Counterfeit Products directly to consumers through their Infringing Websites, Infringing Social Media, and also on a wholesale basis to other purveyors of Counterfeit Products.

357. Plaintiffs confirmed the counterfeit nature of the products offered for sale by Defendants through a visual inspection of the Infringing Websites, including cross-referencing the Infringing Websites against a list of authorized sellers of Plaintiffs' Products.

358. In addition, Plaintiffs have confirmed the counterfeit nature of the products offered for sale by Defendants by inspecting goods that Plaintiffs' investigator purchased from the Infringing Websites. Plaintiff's investigator placed orders for Counterfeit Products through at least one Infringing Website in each Defendant Network, and received Counterfeit Products from each network, with the exception of Network 50. Plaintiffs have inspected the purchases received by their investigator as a result of orders placed through the Infringing Websites and, in each instance, determined that the product received was a Counterfeit Product. Plaintiff inspected the images on the Infringing Website operated by Network 50 Defendants, and confirmed that the ordered product was a Counterfeit Product.

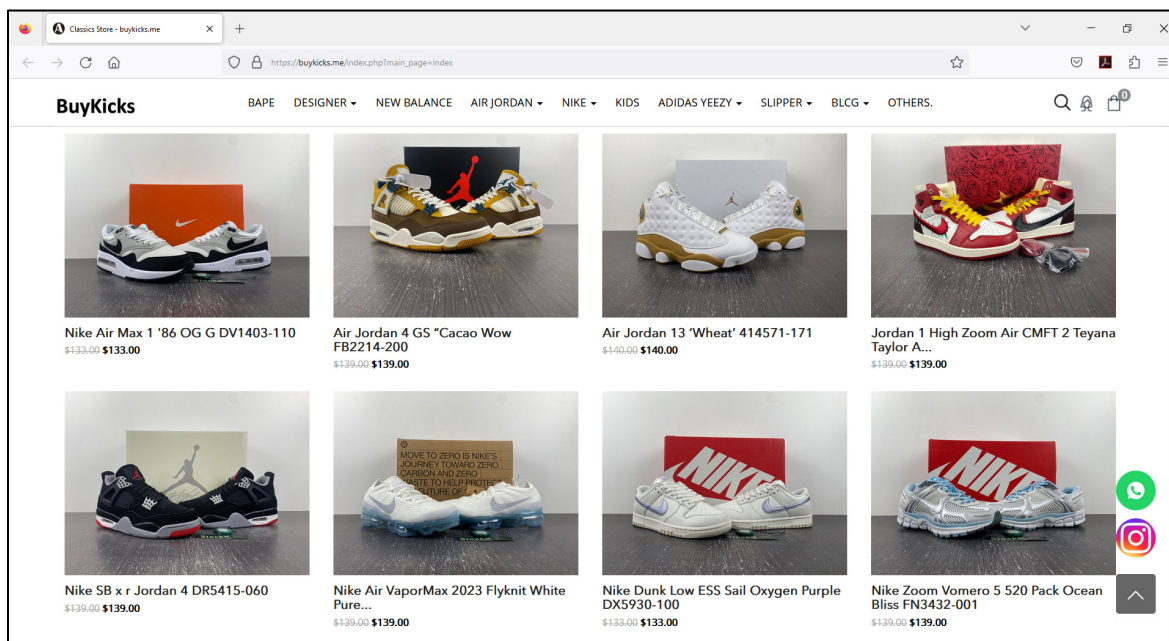
359. The products offered for sale by Defendants are not authentic Nike or Converse Products. Plaintiffs did not manufacture, inspect, or package the Counterfeit Products, and did not approve the Counterfeit Products for sale and/or distribution. Even though the Defendants' Counterfeit Products are of inferior quality, they appear superficially similar, and in some cases superficially identical, to genuine Nike or Converse Products. The design of the Counterfeit Products and the display of the Plaintiffs' Marks on and in connection with the Counterfeit Products communicates to consumers—and may confuse consumers into believing—that the Counterfeit Products were manufactured, licensed, approved or sponsored by, or otherwise affiliated with Plaintiffs.

360. Defendants have offered these Counterfeit Products for sale without permission, authority or license from Plaintiffs and, upon information and belief, such actions were taken in bad faith

with full knowledge of Plaintiffs' ownership of and/or exclusive rights to use and license the Nike and Converse Marks. At all relevant times and in furtherance of their infringing activities, Defendants have willfully and intentionally used and continue to use the Plaintiffs' Marks on their Counterfeit Products.

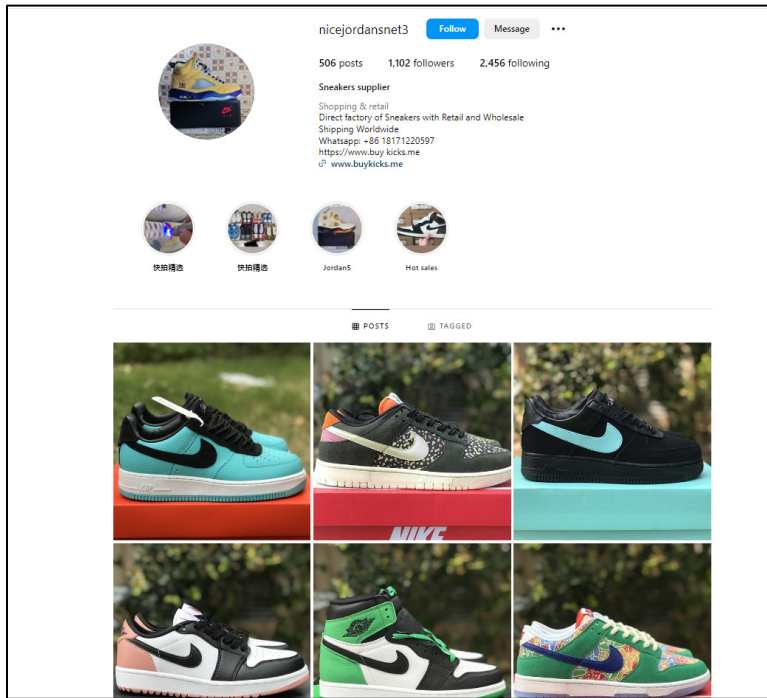
361. In particular, Defendants make liberal use of Plaintiffs' Marks on their websites and related social media accounts to make an explicit connection between their Counterfeit Products and genuine Nike or Converse Products.

362. For example, set forth below is a true and accurate screenshot from one page of the Infringing Websites operated by the Network 4 Defendants, buykicks.me, in which Defendants describe their products as "Nike" and "Jordan" shoes and make liberal use of the Nike Marks in marketing their Counterfeit Products.

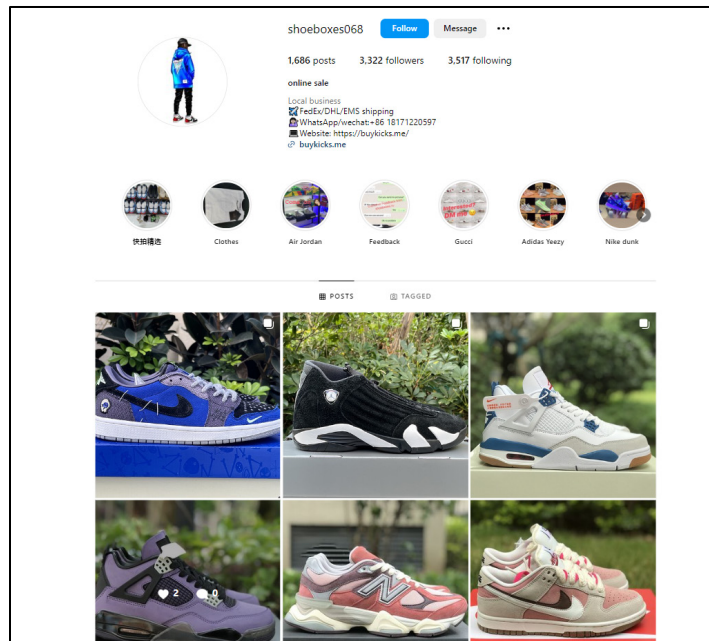


This website is also associated with at least two Instagram accounts, nicejordansnet3 and shoeboxes068. These Instagram accounts have 1,102 and 3,322 followers respectively. As shown below, nicejordansnet3 advertises Nike and Air Jordan sneakers, directing users to purchase them from buykicks.me.

Nicejordansnet3 Instagram Account



Shoebboxes068 Instagram Account



363. Upon information and belief, in order to evade disruption of their business as a result of anti-counterfeiting enforcement, Defendants have registered a large portfolio of domain names to use should one of their Infringing Websites be detected and shut down.

364. Defendants have gone to great lengths to avoid being held accountable for their unlawful acts and to ensure that their illicit counterfeiting operations will not be impeded by brand owners like Plaintiffs or law enforcement. Defendants intentionally conceal their true identities by conducting business only electronically over the Internet and by utilizing fictitious and/or incomplete names and contact information in nearly all facets of their business.

365. Despite the Defendants' attempts to remain anonymous, as a consequence of conducting their counterfeiting operations electronically, the Defendants must interact with legitimate financial institutions in order to accept customer payment for the Counterfeit Products and to transfer the proceeds from these illicit sales into Defendants' own financial accounts.

366. On information and belief, Defendants make use of the services of at least the following banks, savings and loan associations, credit card companies, credit card processing agencies, or other financial institutions or agencies that engage in the transfer of real property in order to carry out, facilitate, complete, or ratify the unlawful transactions complained of herein or used such entities to hold, transfer, transmit, relay, maintain, or invest profits from the unlawful activities described herein: (1) PayPal; (2) American Express, MasterCard, Visa, American Express, and/or Discover; (3) Apple Pay; (4) Cash App; (5) Alipay; (6) Bitcoin; (7) MoneyGram; (8) PaySend; (9) Transfer Wise; (10) Union Pay; (11) Venmo; (12) WeChat Pay; (13) Western Union; (14) Zelle; and (15) JCB.

FIRST CAUSE OF ACTION

(Trademark Infringement Under Section 32
of the Lanham Act, 15 U.S.C. § 1114(1)(a))

367. Plaintiffs repeat and reallege each and every allegation in the foregoing paragraphs as if fully set forth herein.

368. As set forth above, a number of Plaintiffs' Marks are subject to registration on the Principal Register of the United States Patent and Trademark Office. Plaintiffs' Marks and the goodwill of the businesses associated with them in the United States and throughout the world are of great and significant value, are highly distinctive and arbitrary, and have become universally associated in the public mind with products and services of the very highest quality and reputation.

369. Defendants' actions described above have caused and are likely to cause confusion and mistake and to deceive potential customers in the United States and the general purchasing public as to the source, origin, or sponsorship of their Counterfeit Products, and are likely to deceive the public into believing that the Counterfeit Products sold by Defendants originate from, are associated with, or are otherwise authorized by Plaintiffs, all to the damage and detriment of Plaintiffs' reputation, goodwill and sales.

370. As described above, Defendants' use Plaintiffs' Marks in commerce in the United States and caused consumer confusion in the United States through their use of interactive websites to offer for sale the Counterfeit Products to consumers in the United States and the shipment of Counterfeit Products into New York.

371. Defendants' unauthorized use of the Plaintiffs' Marks in commerce in the United States constitutes trademark infringement of Plaintiffs' federally registered trademarks, the full extent of which is presently unknown but is substantial. This has caused damage to Plaintiffs and the

substantial business and goodwill symbolized by the Plaintiffs' Marks in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114.

372. Defendants' actions described above, including the unauthorized use of the Plaintiffs' Marks in interstate commerce, have caused, and unless restrained will continue to cause, great and irreparable injury to Plaintiffs, to the Plaintiffs' Marks, and to the business and goodwill represented thereby, leaving Plaintiffs with no adequate remedy at law.

SECOND CAUSE OF ACTION

(Trademark Counterfeiting Under Sections 32, 34 and 35,
of the Lanham Act, 15 U.S.C. §§ 1114(1)(b), 1116(d), & 1117(b)-(c))

373. Plaintiffs repeat and reallege each and every allegation in the foregoing paragraphs as if fully set forth herein.

374. Without Plaintiffs' authorization or consent, and having knowledge of Plaintiffs' well-known and prior rights in the Plaintiffs' Marks, Defendants have distributed, advertised, offered for sale and/or sold their Counterfeit Products to the consuming public in direct competition with Plaintiffs, in or affecting interstate commerce.

375. Defendants' Counterfeit Products reproduce, counterfeit, copy, and colorably imitate the Plaintiffs' Marks or display spurious designations that are identical with, or substantially indistinguishable from the Plaintiffs' Marks. Defendants have applied their reproductions, counterfeits, copies, and colorable imitations to labels and advertisements intended to be used in commerce upon or in connection with the sale, distribution, or advertising of Defendants' Counterfeit Products, which is likely to cause confusion, or to cause mistake, or to deceive.

376. Defendants' unauthorized use of the Plaintiffs' Marks on or in connection with the Counterfeit Products was done with notice and full knowledge that such use was not

authorized or licensed by Plaintiffs. Defendants' actions constitute willful counterfeiting of the Plaintiffs' Marks in violation of 15 U.S.C. §§ 1114, 1116(d), and 1117(b)-(c).

377. As a direct and proximate result of Defendants' conduct, Plaintiffs have suffered damage to their valuable trademarks and other damages in an amount to be proved at trial.

378. Plaintiffs do not have an adequate remedy at law, and will continue to be damaged by Defendants' sale of Counterfeit Products unless this Court enjoins Defendants from such fraudulent business practices.

THIRD CAUSE OF ACTION

(False Designation of Origin Under Section 43(a)
of the Lanham Act, 15 U.S.C. § 1125(a))

379. Plaintiffs repeat and reallege each and every allegation in the foregoing paragraphs as if fully set forth herein.

380. As a result of Plaintiffs' experience, care, and service in producing and providing genuine Nike and Converse Products, these products have become widely known and have acquired a worldwide reputation for excellence. Moreover, the Plaintiffs' Marks have become associated with the respective Plaintiffs' Products, and have come to symbolize the reputation for quality and excellence associated with Plaintiffs and authentic products produced by them. As such, the Plaintiffs' Marks have attained secondary meaning. The Plaintiffs' Marks are also inherently distinctive.

381. Defendants' use of the Plaintiffs' Marks on or in connection with the Counterfeit Products, as alleged above, is likely to confuse, mislead, or deceive customers, purchasers, and members of the general public as to the origin, source, sponsorship, or affiliation of the Counterfeit Products, and is likely to cause such people to believe in error that the Counterfeit

Products have been authorized, sponsored, approved, endorsed, or licensed by Plaintiffs, or that Defendants are in some way affiliated with Plaintiffs.

382. Defendants' actions, including but not limited to their unauthorized use in commerce of the Plaintiffs' Marks, constitute a false designation of origin, false and misleading descriptions of fact, and false and misleading representations of fact, which have caused, and are likely to cause, confusion, mistake and deception, in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a).

383. Defendants' actions as described above, including their unauthorized, false, and misleading use in commerce of the Plaintiffs' Marks on Counterfeit Products and other uses of Plaintiffs' Marks in interstate commerce, have caused, and unless restrained, will continue to cause, great and irreparable injury to Plaintiffs, and to the business and goodwill represented by the Plaintiffs' Marks in an amount that cannot presently be ascertained, leaving Plaintiffs with no adequate remedy at law.

FOURTH CAUSE OF ACTION

(Trademark Dilution Under the Federal
Trademark Dilution Act, 15 U.S.C. § 1125(c))

384. Plaintiffs repeat and reallege each and every allegation in the foregoing paragraphs as if fully set forth herein.

385. The Plaintiffs' Marks are famous within the meaning of the Trademark Dilution Revision Act of 2006. Among other things: (1) the Plaintiffs' Marks have a high degree of inherent distinctiveness; (2) the Plaintiffs' Marks have been used continuously for decades throughout the United States to promote many goods and services; (3) Plaintiffs and their authorized licensees have advertised and publicized the Plaintiffs' Marks continuously for decades throughout the United States; (4) Plaintiffs have used their trademarks in a trading area

of broad geographical scope encompassing all of the states and territories of the United States; (5) the Plaintiffs' Marks are among the preeminent marks in the relevant market; (6) the Plaintiffs' Marks have an extremely high degree of recognition among consumers; (7) there are no trademarks similar to the Plaintiffs' Marks; and (8) many of the Plaintiffs' Marks are the subject of valid and subsisting registrations under the Lanham Act on the Principal Register.

386. Because Plaintiffs' Products have gained a reputation for superior quality and excellence, the Plaintiffs' Marks have gained substantial renown and reputation.

387. Defendants' use of the Plaintiffs' Marks is likely to blur the Plaintiffs' Marks and impair their distinctiveness. Consumers are likely to associate Defendants' uses of the Plaintiffs' Marks with the Plaintiffs' Marks themselves because of the similarity between Defendants' use of the Plaintiffs' Marks and the Plaintiffs' Marks themselves. In particular, the following factors make dilution by blurring likely: (1) Defendants are making use of the Plaintiffs' Marks themselves; (2) the Plaintiffs' Marks have acquired tremendous distinctiveness through Plaintiffs' continuous promotion and use of their respective Marks; (3) the Plaintiffs' Marks have become famous and achieved a high level of recognition among the consuming public; (4) Plaintiffs' commercial use of their respective Marks is substantially exclusive to Plaintiffs and their agents and licensees; (5) on information and belief, Defendants intend to create an association between Defendants' uses of the Plaintiffs' Marks and the Plaintiffs' Marks themselves; and (6) on information and belief, many consumers actually associate Defendants' uses of the Plaintiffs' Marks or marks confusingly similar thereto with the Plaintiffs' Marks themselves.

388. Defendants' conduct as alleged above is also likely to cause tarnishment and harm the reputation of the Plaintiffs' Marks because of the similarity between Defendants' uses of the

Plaintiffs' Marks and the Plaintiffs' Marks themselves. In particular, the Counterfeit Products sold, offered for sale, and/or distributed by Defendants display the Plaintiffs' Marks in a manner that is confusingly similar to Plaintiffs' Products and therefore mislead consumers into believing that the Plaintiffs' Products are of low quality.

389. Defendants' conduct described above dilutes, blurs, tarnishes, and whittles away the distinctiveness of the Plaintiffs' Marks, and has caused actual dilution and has detracted from the distinctiveness of the famous Plaintiffs' Marks with consequent damage to Plaintiffs, and to the substantial business and goodwill symbolized by the Plaintiffs' Marks in violation of the Federal Trademark Dilution Act, 15 U.S.C. § 1125(c).

390. Defendants' acts of trademark dilution have caused and, unless restrained, will continue to cause, great and irreparable injury to Plaintiffs, to the Plaintiffs' Marks, and to the substantial business and goodwill represented thereby, in an amount that cannot be presently ascertained, leaving Plaintiffs with no adequate remedy at law.

391. Defendants' conduct has been undertaken with a willful intent to trade on the reputation of Plaintiffs and to cause dilution of the famous Plaintiffs' Marks, and this conduct entitles Plaintiffs to damages and other remedies available pursuant to 15 U.S.C. § 1125(c)(2).

FIFTH CAUSE OF ACTION

(Trademark Infringement Under New York Law)

392. Plaintiffs repeat and reallege each and every allegation in the foregoing paragraphs as if fully set forth herein.

393. Defendants' acts as described above constitute trademark infringement under New York common and/or statutory law. N.Y. Gen. Bus. Law §§ 360-k, 360-o.

SIXTH CAUSE OF ACTION

(Trademark Dilution Under New York Law)

394. Plaintiffs repeat and reallege each and every allegation in the foregoing paragraphs as if fully set forth herein.

395. Defendants' acts as described above dilute and detract from the distinctiveness of the famous Plaintiffs' Marks, resulting in damage to Plaintiffs and the substantial business and goodwill symbolized by the Plaintiffs' Marks in violation of New York's Anti-Dilution Statute, N.Y. Gen. Bus. Law § 360-l.

SEVENTH CAUSE OF ACTION

(Unfair Competition Under New York Law)

396. Plaintiffs repeat and reallege each and every allegation in the foregoing paragraphs as if fully set forth herein.

397. Defendants' acts as described above constitute unfair competition under New York State common law, as preserved by N.Y. Gen. Bus. Law § 360-o.

EIGHTH CAUSE OF ACTION

(Deceptive Acts and Practices Under New York Statutory Law)

398. Plaintiffs repeat and reallege each and every allegation in the foregoing paragraphs as if fully set forth herein.

399. Defendants' acts as described above constitute deceptive acts and practices and false advertising in violation of N.Y. Gen. Bus. Law §§ 349-350.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request that this Court:

1. Immediately and permanently enjoin Defendants, their officers, directors, agents, representatives, successors or assigns, and all persons acting in concert or in participation with any of them from:

- (a) using Plaintiffs' Marks, or any reproduction, counterfeit, copy, or colorable imitation of Plaintiffs' Marks, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks, in connection with manufacturing, distributing, delivering, shipping, importing, exporting, advertising, marketing, promoting, selling or offering for sale Counterfeit Products or any other products confusingly similar to Plaintiffs' Products, or that otherwise bear, contain, display, or utilize any of the Plaintiffs' Marks;
- (b) making or employing any other commercial use of the Plaintiffs' Marks, any derivation or colorable imitation thereof, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks;
- (c) using any other false designation of origin or false description or representation or any other thing calculated or likely to cause confusion or mistake in the mind of the trade or public or to deceive the trade or public into believing that Defendants' products or activities are in any way sponsored, licensed or authorized by or affiliated or connected with Plaintiffs;
- (d) using or transferring ownership of the Infringing Websites or registering or using any domain names incorporating, in whole or in

- part, any word or mark identical or similar to the name Nike or Converse or otherwise making use of the Plaintiffs' Marks;
- (e) using or transferring ownership of the Infringing Social Media, in whole or in part, any word or mark identical or similar to the name Nike or Converse or otherwise making use of the Plaintiffs' Marks
 - (f) doing any other acts or things calculated or likely to cause confusion or mistake in the mind of the public or to lead purchasers or consumers or investors to believe that the products or services promoted, offered, or sponsored by Defendants come from Plaintiffs' or their licensees, or are somehow licensed, sponsored, endorsed, or authorized by, or otherwise affiliated or connected with Plaintiffs;
 - (g) moving, returning, destroying, secreting, or otherwise disposing of any Counterfeit Products or any products that otherwise bear, contain, display, or utilize any of the Plaintiffs' Marks, any derivation or colorable imitation thereof, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks;
 - (h) removing, destroying, altering, secreting, or otherwise disposing of any computer files, electronic files or data, business records, or documents containing any information relating to any of the Infringing Websites or Infringing Social Media, Defendants' assets or operations, or to the importing, manufacturing, production, marketing, advertising, promoting, acquisition, purchase, distribution or sale of Counterfeit Products or any products that otherwise bear contain, display, or utilize

any of the Plaintiffs' Marks, any derivation or colorable imitation thereof, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks;

- (i) further diluting and infringing the Plaintiffs' Marks and damaging Plaintiffs' goodwill;
- (j) otherwise competing unfairly with Plaintiffs or any of their authorized licensees in any manner;
- (k) secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying any of Defendants' assets from or to Defendants' financial accounts until further ordered by this Court; and
- (l) assisting, aiding, or abetting any other person or business entity in engaging in or performing any of the activities referred to in the above subparagraphs (a) through (k), or effecting any assignments or transfers, forming new entities or associations, or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in subparagraphs (a) through (k).

2. Direct Defendants their officers, directors, agents, representatives, successors or assigns, and all persons acting in concert or in participation with any of them to:

- (a) account to Plaintiffs for their profits and order that Plaintiffs recover each Group of Defendants' illicit profits, and a sum equal to three times each Group of Defendants' profits, pursuant to 15 U.S.C. § 1117(b); or, in the alternative,

- (b) award Plaintiffs damages arising out of Defendants' acts of deception and infringement described above, and a sum equal to three times each Group of Defendants' damages, pursuant to 15 U.S.C. § 1117 (b); or, in the alternative,
- (c) award Plaintiffs statutory damages against each Network of Defendants, as calculated in the attached Exhibit 6, representing the statutory maximum of \$2 million for each and every Nike and Converse Mark that Defendants willfully counterfeited and infringed per type of good sold, offered for sale, or distributed by each Group of Defendants, pursuant to 15 U.S.C. § 1117(c);

3. Award Plaintiffs punitive damages pursuant to New York State common law (as preserved by N.Y. Gen. Bus. Law § 360-o) on account of Defendants' gross, wanton, willful, and malicious conduct;

4. Direct Defendants to recall and remove from all stores, shops, markets, outlets, catalogues, websites, social media, or other channels of commerce any Counterfeit Products or any other products confusingly similar to Plaintiffs' Products, or that otherwise bear, contain, display, or utilize any of Plaintiffs' Marks, any derivation or colorable imitation thereof, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks, that are in Defendants' possession or control and all means of making the same;

5. Direct Defendants to deliver up for destruction all Counterfeit Products or any other products confusingly similar to Plaintiffs' Products, or that otherwise bear, contain, display or utilize any of the Plaintiffs' Marks, any derivation or colorable

imitation thereof, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks, that are in Defendants' possession or control and all means of making the same, in accordance with 15 U.S.C. § 1118;

6. Direct Defendants to deliver up for destruction any and all guarantees, circulars, price lists, labels, signs, prints, packages, wrappers, pouches, receptacles, advertising matter, promotional, and other materials in the possession or control of Defendants bearing any of the Plaintiffs' Marks, any derivation or colorable imitation thereof, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks, in accordance with 15 U.S.C. § 1118;

7. Direct Defendants to supply Plaintiff with a complete list of entities from whom they purchased and to whom they distributed and/or sold Counterfeit Products or any other products confusingly similar to Plaintiffs' Products, or that otherwise bear, contain, display or utilize any of the Plaintiffs' Marks, any derivation or colorable imitation thereof, or any mark confusingly similar thereto or likely to dilute or detract from the Plaintiffs' Marks, and to provide the manner through which the Counterfeit Products or other products were paid, including any bank accounts to, through, or from which funds were wired;

8. Award Plaintiffs reasonable attorneys' fees along with the costs and disbursements incurred herein as a result of Defendants' intentional and willful infringement, pursuant to 15 U.S.C. § 1117 and N.Y. Gen. Bus. Law § 349(h);

9. Order that Defendants are prohibited from registering any domain names incorporating, in whole or in part, any word or mark identical or similar to the trademarked Nike or Converse names, or otherwise making use of the Plaintiffs' Marks;

10. Order that Defendants are prohibited from registering or creating any other social media incorporating, in whole or in part, any word or mark identical or similar to the trademarked Nike or Converse names, or otherwise making use of the Plaintiffs' Marks;

11. Order that the domain name registries, including but not limited to VeriSign, Inc., NeuStar, Inc., Nominet UK, Registry Services, LLC, .Club Domains, LLC, Public Interest Registry and/or the individual registrars holding or listing one or more domain names used in conjunction with Defendants' Infringing Websites shall immediately disable the domain names of Defendants' Infringing Websites, through a registry hold or otherwise, and make them inactive and untransferable, and;

12. Order social media entities and/or the individual social media entities holding or listing one or more social media accounts used in conjunction with Defendants' Infringing Social Media shall immediately disable the Infringing Social Media, through and make them inactive and untransferable

13. Order that any of Defendants' assets that are held by or within the control of entities, including third-party financial institutions, that are subject to the jurisdiction of this Court, be restrained and frozen pending the outcome of this action so that Plaintiffs' right to the equitable relief set forth in this Complaint is not later rendered meaningless;

14. Order that, in accordance with Rule 65 of the Federal Rules of Civil Procedure, 15 U.S.C. § 1116(a), Article 52 of New York State's Civil Practice Law and Rules, and the Court's inherent and equitable powers to issue remedies ancillary to its authority to provide final relief, that all of Defendants' assets that are held by or within

the control of entities, including third-party financial institutions, that are subject to the jurisdiction of this Court, be permanently restrained and frozen, regardless of whether the assets are located in the United States or aboard, except that the Defendants may transfer the funds on deposit to Gibson Dunn's client trust account;

15. Direct Defendants to file with the Court and serve on counsel for Plaintiffs within thirty (30) days after entry of any injunction issued by the Court in this action, a sworn written statement pursuant to 15 U.S.C. § 1116(a) setting forth in detail the manner and form in which Defendants have complied with any injunction which the Court may enter in this action; and

16. Award Plaintiffs such other and further relief as the Court deems just and proper.

Dated: June 10, 2024
New York, New York

By: /s/ Robert L. Weigel
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Howard S. Hogan
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200 Park Avenue
New York, NY 10166-0193
Telephone: 212.351.4000

*Attorneys for Plaintiffs Nike, Inc. and
Converse Inc.*

EXHIBIT 1

Defendant Networks				
Defendant Network	Website	Email	Social	Names
1	rimisneaker.cc rimisneaker.ru rimisneaker.us	rimisneaker@gmail.com sz@baofuplus.com	8615622391330 (Whatsapp) 8617359417330 (Whatsapp) UCMtsBM93bWwMNibYKuLEY8Q (YouTube) rimisneaker_1 (Instagram) rimisneaker (Wechat)	Shiby NY Inc. Ming Fu Hong Trading Limited
2	bstsneaker.com bstsneakers.com songsneaker.com stockxshoes.com stockxshoesvip.com	amy@bstsneaker.com amy@bstsneakers.com info@smartselfbalancewheel.com maysong@songsneaker.com service@stockxshoes.com	18950744921 (WeChat) 85244048557 (Whatsapp) 85297976425 (Whatsapp) 8613646012644 (Whatsapp) 8618950744921 (Whatsapp) UCW6c2Qjjrc_eRBttl6FnUQ (YouTube) UCiVgTu562GBKYVETpPrNCHA (YouTube) UCoxkgQebYcC7Wpnc4q5Ykzg (YouTube) UCtnTC07rJe8filoxg5xc5qg (YouTube) SongSneaker-105636734730124 (Facebook) bstsneaker.store (Instagram) bstsneakers.store (Instagram) bstsneakersofficial (Instagram)	\$ytrading616 Mr. Wang

Defendant Networks				
Defendant Network	Website	Email	Social	Names
			stockxshoes_tt (Instagram) stockxshoes_xx2 (Instagram) r/BSTReps (Reddit) r/Stockxshoescom (Reddit)	
3	cocoshoes.net cocoshoesvip.com bagsmalles.com	cocoshoes2011@gmail.com	85264329578 (Whatsapp) UCbFWidqtG9P82KIW81RbNIQ (YouTube) COCO-SHOES-108421181587233 (Facebook) cocoshoesjing_ (Instagram) cocoshoesnet (Instagram) cocoshoesshop_ (Instagram) 18950744921 (Wechat)	
4	buykicks.me	buykicks888@163.com buykicks888@gmail.com shoeboxes0597@gmail.com dingna888@outlook.com	8618171220597 (Whatsapp) 861886529701 (Whatsapp) buykicks88 (Instagram) nicejordansnet3 (Instagram) shoeboxes068 (Instagram) 8618171220597 (Wechat) 861886529701 (Wechat) 8618086529701 (Whatsapp)	

Defendant Networks				
Defendant Network	Website	Email	Social	Names
5	carlsneaker.com	carlkicks.com@gmail.com baowu66520@163.com	18396000349 (Whatsapp) 8618396000349 (Whatsapp) carlkicks1 (Instagram) carlkicks (Wechat)	Joom E-Commerce Company Limited
6	ddkicks.net	DDkicks2009@gmail.com chenyansong7706@outlook.com	8617359057025 (Whatsapp) UC-A9EoPxIEYzjAsyaRBGcjA (YouTube) ddkicks2009 (Instagram) r/ddkicks (Reddit)	
7	hotkicks.cc hotkicks.org	hotkicks.cc@gmail.com hotkicks666@gmail.com LQG7183167666@gmail.com	16167554659 (Whatsapp) 85257671726 (Whatsapp) hotkicks.cc (Facebook) hotkicks.org (Facebook) hotkicks.cc2 (Instagram) hotkicks_official (Instagram) hotkicksorg.official2 (Instagram) r/HotKicks_Offical (Reddit)	GDLEYU INC.
8	hypeunique.com hypeunique.is hypeunique.me	cshypeunique@gmail.com lqg718316766@gmail.com	85251750050 (Whatsapp) UCRdNAICN3iK_tZjr3yrjddA (YouTube) hypeunique.review (Instagram) hypeunique__review (Instagram)	GDLEYU Inc.
9	kickmax.ru	kickmax08@gmail.com Delta1879@outlook.com	85368525066 (Whatsapp) gslucky88 (Instagram)	EFX FASHION INC.

Defendant Networks				
Defendant Network	Website	Email	Social	Names
			kickmax0 (Instagram)	
10	kickscentral.cc kickscentral.me killone.x.yupoo.com	kickscentralnet@gmail.com 525843008@qq.com	8618250518099 (Whatsapp) UCLOCBVp7Np1mfjGVDto k3EA (YouTube) kicks_wow (Instagram) kicksfollow (Instagram) pinkkickz (Instagram) kickscentral (Wechat) r/kickscentral (Reddit)	
11	kickwho.cc kickwho.xyz	admin@kickwho.org kickwhoofficial@gmail.com	85253741963 (Whatsapp) 85255139716 (Whatsapp) 85291452559 (Whatsapp) 8613023858310 (Whatsapp) kickwho.snkrs (Instagram) kwsnkrs.review (Instagram) shoe_reviewss (Instagram) kickwho (Wechat) kickwho-snkrs (Wechat) r/kickwho (Reddit) u/kickwho_l (Reddit)	Misstylea
12	kickzluucas.com	sneaker1908@outlook.com yaozee@hotmail.com kickzluucas@hotmail.com	8613959504723 (Whatsapp) kickzluucasofficial (Instagram)	厦门同安区东虹启贸易有限公司 Joom E-Commerce Company Limited
13	lgrose.ru xbl0594.x.yupoo.com	lgroseru@outlook.com guolinleov@yeah.net	8613599017477 (Whatsapp)	Guoxiong Lin

Defendant Networks				
Defendant Network	Website	Email	Social	Names
			8613599462933 (Whatsapp) lgrose.ru (Instagram) lgroseru55 (Instagram)	
14	lkkiks.com	lkkikspro@gmail.com zxcg0508@yeah.net	8613459075059 (Whatsapp) lkkiks_com (Instagram) lkkiks (Wechat)	Xianguo Zhou Bo Ying Trading Hong Kong Limited
15	888kicks.ru	service@888kicks.ru zhongwei6983@outlook.com	85254929956 (Whatsapp) 8617396500129 (Whatsapp) UC_sm5K0xcii0FEZKm4TQYKQ (YouTube) love888kicks (Instagram) r/888kicks (Reddit)	
16	mangomeee.com	blackstore19@163.com shiyingliao1@gmail.com	8613255911553 (Whatsapp) 8617759076897 (Whatsapp) mangomeee.snkr (Instagram) mangomeee.snkr (Instagram) mangomeee2022 (Instagram) mangofamilys shoes (Wechat) mangomeee (Wechat)	MIKA TECHNOLOGY CO., LIMITED
17	mangomeee.co	lesslieuey@gmail.com mangomeeeofficial@163.com 2803417414@qq.com	85252610300 (Whatsapp) 85265997053 (Whatsapp) UC3G1SHtuPYzjtHLKfXcENw (YouTube)	

Defendant Networks				
Defendant Network	Website	Email	Social	Names
			mangomeee_official (Instagram) mangomeeeclub (Instagram) 44 7927 522960 (Whatsapp)	
18	monicasneaker.cc	ellen143feng@hotmail.com monicasneaker@gmail.com 921478041@qq.com	8617007357135 (Whatsapp) 8618396001806 (Whatsapp) monicasneaker.ccc (Instagram) 8618396001806 (Wechat) 8617189364043 (Phone) r/monicasneaker (Reddit) u/og_monica (Reddit)	Ming Fu Hong Trading Limited
19	houyw.x.yupoo.com	1044086152@qq.com	8613266816871 (Whatsapp) 8618183338814 (Whatsapp) mrhou_4898 (Instagram) mr-hou4898 (Wechat)	Bo Ying Trading Hong Kong Limited
20	muksstore.x.yupoo.com	1273525285@qq.com	18105229793 (Whatsapp) 8613799614052 (Whatsapp) official_muksstore (Instagram)	刘永乐 Bo Ying Trading Hong Kong Limited
21	rarerepsneaker.x.yupoo.com rarerepclothing.x.yupoo.com	1223778499@qq.com	8613328838183 (Whatsapp) rarerepclothing (Instagram)	Sing Ying Trading Limited

Defendant Networks				
Defendant Network	Website	Email	Social	Names
			rarerepsneaker2 (Instagram) rarerepsneaker3 (Instagram) 13328838183 (Wechat)	
22	hewitt2303.x.yupoo.com	3528315590@qq.com	8618879144396 (Whatsapp) ryannorman4 (Instagram)	
23	sharesneaker.us sharesneaker.vip sharesneakers.us sharesneakers.vip stockxpro.com stockxpro.vip stockxprovip.com supersneakers.vip stylesneaks.com	stockxpro01@gmail.com stylesneaks@gmail.com sharesneakervip@gmail.com	15659806542 (Whatsapp) 85256109281 (Whatsapp) 8615659806542 (Whatsapp) UCsn9Ca6IOjScas9rEeLrXA (YouTube) stockxpro (YouTube) stockxpro.usa (Instagram) stockxprosneakers (Instagram) stockxpro-vip-alice (Wechat) r/StockxPro (Reddit) r/fashionrep (Reddit) r/stockxpro (Reddit) u/stockxproservice (Reddit)	PYN*Cnfashion Club
24	timsneakers.com	vipcustomerservice1@gmail.com hellotracy2018@qq.com	8613015983512 (Whatsapp) 8618650212083 (Whatsapp) UCw_A-4QUn_CEKM8cfMQpjaQ (YouTube)	

Defendant Networks				
Defendant Network	Website	Email	Social	Names
			timsneakerscom (Instagram) 8613015983512 (Wechat) r/Timsneakers (Reddit) r/timsneakers (Reddit) u/timsneakers_com (Reddit)	
25	ubuysneakers.com	ubuysneakers@outlook.com mislich@outlook.com	85264265446 (Whatsapp) 85294300508 (Whatsapp) ubuysneakers (Instagram) r/UBuySneakers (Reddit) r/ubuysneakers (Reddit) u/ubuysneakers (Reddit)	Casnda Corp Limited-B2C
26	ulrica688.x.yupoo.com	2101979609@qq.com	8617767113866 (Whatsapp) ulrica688888 (Instagram)	Bo Ying Trading Hong Kong Limited
27	bmlin.net hypeshoes.co stockxkicks.com wawone.com	bmlinbella@gmail.com hypeshoes.co3@gmail.com stockxkicksvip@gmail.com	447594776750 (Whatsapp) 85253806268 (Whatsapp) 85267237597 (Whatsapp) 8618039014337 (Whatsapp) UCBvFg4ZvGFGDjGcjkhd_IA (YouTube) UCvCL_rkEWJwi4V4lfzoWHZA (YouTube) hypeshoes.co (Facebook) bmlinshoes1 (Instagram) hypeshoesco (Instagram) love.nicekicks (Instagram) lovekicks.vip (Instagram)	

Defendant Networks				
Defendant Network	Website	Email	Social	Names
			stockx_kicks_ (Instagram) r/HYPESHOES_co (Reddit) r/Stockxkicks (Reddit)	
28	clubkickz.com footskick.ru	clubkickz5@gmail.com footskick2@gmail.com yadonghuang693@outlook.com yildizguney31@gmail.com (PP) alan9527mand@outlook.com (ZL)	85260981515 (Whatsapp) 8618086465089 (Whatsapp) 861886465089 (Whatsapp) footskicks8 (Instagram) 861886465089 (Wechat)	Star EFX Fashion Inc.
29	coolkicksmall.com	service@coolkicksmall.com	8618959235127 (Whatsapp)	\$Kaideninc616
30	crewkick.net crewkicks.org	crewkickofficial@gmail.com info@crewkick.net service@crewkick.net service@wintopay.com	18389001437 (Whatsapp) 85252246012 (Whatsapp) UCYxgYy8bBebOmC0X-v5YsDg (YouTube) r/crewKickr3ps (Reddit) u/crewKICK_ (Reddit)	WTP*stepsupshoes
31	dopesneaker.co	dopesneakersale@hotmail.com 3626967975@qq.com	8618107269391 (Whatsapp) dopesneaker.co (Instagram) dopesneakerco (Instagram) 8618107269391 (Wechat)	Jiemao Commerce Co. Ltd. Joom E-Commerce Company Limited
32	flightkickz.cn flightkickz.com kicksgate.com	flightkickz@gmail.com flightkickz2017@gmail.com	17477671215 (Whatsapp) 7477671215 (Whatsapp) 85255465409 (Whatsapp)	志雄 祁 Chan Wai

Defendant Networks				
Defendant Network	Website	Email	Social	Names
	In5factory.com yzynation.com	qzxandy@163.com	85255465492 (Whatsapp) 8615060357238 (Whatsapp) 9452646188 (Whatsapp) UCWqUfBzNE3aCVtMk45T75aw (YouTube) fkz.plug (Instagram) fkzonfire (Instagram) In5plug (Wechat) r/Flightkickz (Reddit) r/flightkickz (Reddit)	Bo Ying Trading Hongkong Limited
33	gmkim.vn.ua	huijian9023@foxmail.com noreply@ordernotify.net	639053615408 (Whatsapp) 85266080171 (Whatsapp) gmkrose (Instagram) gmktina (Wechat) r/gmksub (Reddit)	郑会见
34	hotkickss.ru	hotkickss1977@hotmail.com czspp2002@outlook.com	85266617105 (Whatsapp) chancy.green.52 (Facebook) hot20023 (Instagram) 852 5347 4599 (Phone)	Joom E-Commerce Company Limited
35	hypeboost.ru hypeboost.shop hypeboost.store hypeboosts.com hypeboosts.ru	ekodgtrading1@gmail.com	17079311942 (Whatsapp) 85267335067 (Whatsapp) hypeboosts (Instagram) tejasrcpilot (Instagram) hypeboosts (Wechat) r/hypeboosts (Reddit)	EKO DG TRADING INC.
36	jdfoot.co	jdfootstore@gmail.com	85253072903 (Whatsapp)	

Defendant Networks				
Defendant Network	Website	Email	Social	Names
	clothswmalls.com		UC71kLLDhnW6aDGytprE2aPA (YouTube) jdfootsneaker (Instagram) jdfootstore (Instagram)	
37	pkshoes.store	pkshoes3@ordermail.org service@ordermail.org pkshoes5@ordermail.org	PK-Shoes-109037267542255 (Facebook)	Vkomall One Pick (HK) Limited
38	dunkskicks.org jordankicks.org popkicks.org popshoe.org	emailbestyeezyshoes@gmail.com emailpopkicksrep@gmail.com emailpopsneakersrep@gmail.com popshoeofficial@gmail.com renl37303@gmail.com	popshoeofficial (Instagram) 3233025706 (Phone)	通城佩娜百货店 PEINABAXNYJ Bo Ying Trading Hong Kong Limited
39	taosneakers.com cnfashionclub.com	taosneakers@gmail.com	8529286003 (Whatsapp) 8618059868271 (Whatsapp) UCjWueb4AHR6SYnsTcqRqBVg (YouTube) aceereps (Instagram) rep.education.center (Instagram) taosneakers_ins (Instagram)	
40	uabat.xyz uabatman.com	liweiliu888@outlook.com	16466377762 (Whatsapp) 8613607545746 (Whatsapp) 8613666905331 (Whatsapp) uabat.ru (Instagram)	

Defendant Networks				
Defendant Network	Website	Email	Social	Names
			uabat0 (Instagram) r/UaBat (Reddit) r/uabat (Reddit) u/uabat (Reddit)	
41	pkstockx.cc	service@pkstockx.com	19565163160 (Whatsapp) UC7yOIAzmFvxSssIVYbfXBpw (YouTube) pkstock.x (Instagram) uabatman.com (Reddit)	\$Kaideninc616
42	sneakerwill.shop	wsneakerwill@gmail.com kailllsneakers@gmail.com	8617359409448 (Whatsapp) 8618605016686 (Whatsapp) sneakerwillshop (Instagram) r/WillSneakers (Reddit)	莆田百耀科技有限公司
43	luckshoes.ru	buyshoesclothing88@gmail.com comes2014@hotmail.com	8613529089262 (Whatsapp) luckshoesru3 (Instagram) r/luckshoesSneakers (Reddit) u/luckshoes (Reddit)	丽明林
44	perfectkicks.top	pkdoingthebest@gmail.com pkdoingthebest11@outlook.com	18059533333 (Whatsapp) 19959503333 (Whatsapp) 8617759018888 (Whatsapp) pkdoingthebest2008 (Instagram) r/PKDoingBest (Reddit) u/PKDoingBest (Reddit)	建辉刘

Defendant Networks				
Defendant Network	Website	Email	Social	Names
45	jaskicks.ru	jaskicks@outlook.com zxq5790316@163.com	8613288881136 (Whatsapp) jaskicks2008 (Instagram) r/jaskicks2008 (Reddit) u/JASKicks2008 (Reddit)	钟小青
46	coptop.net coptop.ru	coptopvip@gmail.com copsneakers.top@gmail.com	85261546060 (Whatsapp) coptop.top (Instagram)	COPTOP 陈珍琴
47	m1sneakers.com	m1sneakers@outlook.com 1053245683@qq.com	85269248974 (Whatsapp) 85292478434 (Whatsapp) m1sneakers (Facebook) m1sneakers01 (Instagram)	Casnda Corp Limited-B2C
48	bomblines.cc bomblines.la	bomblines.cc@gmail.com bomblinesofficial@gmail.com lemonzf73@163.com	85253055346 (Whatsapp) 85256157445 (Whatsapp) 85268421175 (Whatsapp) bomblines_kicks (Instagram) bomblines-cc (Wechat) r/BombLine (Reddit)	Bo Ying Trading Hong Kong Limited
49	ebuysneakers.com	sale@ebuysneakers.com 870895201@qq.com	ebuysneakers (Instagram) 86 138 5985 5080 (Phone)	
50	Xylar.co	sales@xylar.co		SP XYLAR STUDIO
51	dmsneaker.com rsneakers.fun	rwindsneakers@outlook.com		\$DedianFang
52	solenlaces.com	solenlaces21@gmail.com		

EXHIBIT 2

Infringing Websites by Network	
No.	Infringing Website
Network 1	
1	rimisneaker.cc
2	rimisneaker.ru
3	rimisneaker.us
Network 2	
4	bstsneaker.com
5	bstsneakers.com
6	songsneaker.com
7	stockxshoes.com
8	stockxshoesvip.com
Network 3	
9	cocoshoes.net
10	cocoshoesvip.com
11	bagsmalles.com
Network 4	
12	buykicks.me
Network 5	
13	carlsneaker.com
Network 6	
14	ddkicks.net
Network 7	
15	hotkicks.cc
16	hotkicks.org

Infringing Websites by Network	
No.	Infringing Website
Network 8	
17	hypeunique.com
18	hypeunique.is
19	hypeunique.me
Network 9	
20	kickmax.ru
Network 10	
21	kickscentral.cc
22	kickscentral.me
23	killone.x.yupoo.com
Network 11	
24	kickwho.cc
25	kickwho.xyz
Network 12	
26	kickzluucas.com
Network 13	
27	lgrose.ru
28	xbl0594.x.yupoo.com
Network 14	
29	lkkiks.com
Network 15	
30	888kicks.ru
Network 16	

Infringing Websites by Network	
No.	Infringing Website
31	mangomeee.com
Network 17	
32	mangomeee.co
Network 18	
33	monicasneaker.cc
Network 19	
34	houyw.x.yupoo.com
Network 20	
35	muksstore.x.yupoo.com
Network 21	
36	rarerapsneaker.x.yupoo.com
37	rarerepclothing.x.yupoo.com
Network 22	
38	hewitt2303.x.yupoo.com
Network 23	
39	sharesneaker.us
40	sharesneaker.vip
41	sharesneakers.us
42	sharesneakers.vip
43	stockxpro.com
44	stockxpro.vip
45	stockxprovip.com
46	supersneakers.vip

Infringing Websites by Network	
No.	Infringing Website
47	stylesneaks.com
Network 24	
48	timsneakers.com
Network 25	
49	ubuysneakers.com
Network 26	
50	ulrica688.x.yupoo.com
Network 27	
51	bmlin.net
52	hypeshoes.co
53	stockxkicks.com
54	wawone.com
Network 28	
55	clubkickz.com
56	footskick.ru
Network 29	
57	coolkicksmall.com
Network 30	
58	crewkick.net
59	crewkicks.org
Network 31	
60	dopesneaker.co
Network 32	

Infringing Websites by Network	
No.	Infringing Website
61	flightkickz.cn
62	flightkickz.com
63	kicksgate.com
64	ln5factory.com
65	yzynation.com
Network 33	
66	gmkim.vn.ua
Network 34	
67	hotkickss.ru
Network 35	
68	hypeboost.ru
69	hypeboost.shop
70	hypeboost.store
71	hypeboosts.com
72	hypeboosts.ru
Network 36	
73	jdfoot.co
74	clothswmalls.com
Network 37	
75	pkshoes.store
Network 38	
76	dunkskicks.org
77	jordankicks.org

Infringing Websites by Network	
No.	Infringing Website
78	popkicks.org
79	popshoe.org
Network 39	
80	taosneakers.com
81	cnfashionclub.com
Network 40	
82	uabat.xyz
83	uabatman.com
Network 41	
84	pkstockx.cc
Network 42	
85	sneakerwill.shop
Network 43	
86	luckshoes.ru
Network 44	
87	perfectkicks.top
Network 45	
88	jaskicks.ru
Network 46	
89	coptop.net
90	coptop.ru
Network 47	
91	mlsneakers.com

Infringing Websites by Network	
No.	Infringing Website
Network 48	
92	bomblines.cc
93	bomblines.la
Network 49	
94	ebuysneakers.com
Network 50	
95	Xylar.co
Network 51	
96	dmsneaker.com
97	rsneakers.fun
Network 52	
98	solenlaces.com

EXHIBIT 3

Defendants' Known Email Addresses	
No.	Email Address
Network 1	
1	rimisneaker@gmail.com
2	sz@baofuplus.com
Network 2	
3	amy@bstsneaker.com
4	amy@bstsneakers.com
5	info@smartsselfbalancewheel.com
6	maysong@songsneaker.com
7	service@stockxshoes.com
Network 3	
8	cocoshoes2011@gmail.com
Network 4	
9	buykicks888@163.com
10	buykicks888@gmail.com
11	shoeboxes0597@gmail.com
12	dingna888@outlook.com
Network 5	
13	carlkicks.com@gmail.com
14	baowu66520@163.com
Network 6	
15	DDkicks2009@gmail.com
16	chenyansong7706@outlook.com
Network 7	

Defendants' Known Email Addresses	
No.	Email Address
17	hotkicks.cc@gmail.com
18	hotkicks666@gmail.com
19	LQG7183167666@gmail.com
Network 8	
20	cshypeunique@gmail.com
21	lqg718316766@gmail.com
Network 9	
22	kickmax08@gmail.com
23	Delta1879@outlook.com
Network 10	
24	kickscentralnet@gmail.com
25	525843008@qq.com
Network 11	
26	admin@kickwho.org
27	kickwhoofficial@gmail.com
Network 12	
28	sneaker1908@outlook.com
29	yaozee@hotmail.com
30	kickzluucas@hotmail.com
Network 13	
31	lgroseru@outlook.com
32	guolinleov@yeah.net
Network 14	

Defendants' Known Email Addresses	
No.	Email Address
33	lkkikspro@gmail.com
34	zxc0508@yeah.net
Network 15	
35	service@888kicks.ru
36	zhongwei6983@outlook.com
Network 16	
37	blackstore19@163.com
38	shiyingliao1@gmail.com
Network 17	
39	lesslieuey@gmail.com
40	mangomeeeofficial@163.com
41	2803417414@qq.com
Network 18	
42	ellen143feng@hotmail.com
43	monicasneaker@gmail.com
44	921478041@qq.com
Network 19	
45	1044086152@qq.com
Network 20	
46	1273525285@qq.com
Network 21	
47	1223778499@qq.com
Network 22	

Defendants' Known Email Addresses	
No.	Email Address
48	3528315590@qq.com
Network 23	
49	stockxpro01@gmail.com
50	stylesneaks@gmail.com
51	sharesneakervip@gmail.com
Network 24	
52	vipcustomerservice1@gmail.com
53	hellotracy2018@qq.com
Network 25	
54	ubuysneakers@outlook.com
55	mislich@outlook.com
Network 26	
56	2101979609@qq.com
Network 27	
57	bmlinbella@gmail.com
58	hypeshoes.co3@gmail.com
59	stockxkicksvip@gmail.com
Network 28	
60	clubkickz5@gmail.com
61	footskick2@gmail.com
62	yadonghuang693@outlook.com
63	yildizguney31@gmail.com (PP)
64	alan9527mand@outlook.com (ZL)

Defendants' Known Email Addresses	
No.	Email Address
Network 29	
65	service@coolkicksmall.com
Network 30	
66	crewkickofficial@gmail.com
67	info@crewkick.net
68	service@crewkick.net
69	service@wintopay.com
Network 31	
70	dopesneakersale@hotmail.com
71	3626967975@qq.com
Network 32	
72	flightkickz@gmail.com
73	flightkickz2017@gmail.com
74	qzxandy@163.com
Network 33	
75	huijian9023@foxmail.com
76	noreply@ordernotify.net
Network 34	
77	hotkickss1977@hotmail.com
78	czspp2002@outlook.com
Network 35	
79	ekodgtrading1@gmail.com
Network 36	

Defendants' Known Email Addresses	
No.	Email Address
80	jdfootstore@gmail.com
Network 37	
81	pkshoes3@ordermail.org
82	service@ordermail.org
83	pkshoes5@ordermail.org
Network 38	
84	emailbestyeezyshoes@gmail.com
85	emailpopkicksrep@gmail.com
86	emailpopsneakersrep@gmail.com
87	popshoeofficial@gmail.com
88	renl37303@gmail.com
Network 39	
89	taosneakers@gmail.com
Network 40	
90	liweiliu888@outlook.com
Network 41	
91	service@pkstockx.com
Network 42	
92	wsneakerwill@gmail.com
93	kailllsneakers@gmail.com
Network 43	
94	buyshoesclothing88@gmail.com
95	comes2014@hotmail.com

Defendants' Known Email Addresses	
No.	Email Address
Network 44	
96	pkdoingthebest@gmail.com
97	pkdoingthebest11@outlook.com
Network 45	
98	jaskicks@outlook.com
99	zxq5790316@163.com
Network 46	
100	coptopvip@gmail.com
101	copsneakers.top@gmail.com
Network 47	
102	m1sneakers@outlook.com
103	1053245683@qq.com
Network 48	
104	bomblines.cc@gmail.com
105	bomblinesofficial@gmail.com
106	lemonzf73@163.com
Network 49	
107	sale@ebuysneakers.com
108	870895201@qq.com
Network 50	
109	sales@xylar.co
Network 51	
110	rwindsneakers@outlook.com

Defendants' Known Email Addresses	
No.	Email Address
Network 52	
111	solenlaces21@gmail.com

EXHIBIT 4

Infringing Social Media		
No.	Type	Handle
Network 1		
1	WhatsApp	8615622391330
2	WhatsApp	8617359417330
3	YouTube	UCMtsBM93bWwMNIbYKuLEY8Q
4	Instagram	rimisneaker_1
5	WeChat	rimisneaker
Network 2		
6	WeChat	18950744921
7	WhatsApp	85244048557
8	WhatsApp	85297976425
9	WhatsApp	8613646012644
10	WhatsApp	8618950744921
11	YouTube	UCW6c2Qjjrc_eRBttl6F-nUQ
12	YouTube	UCiVgTu562GBKYVETpPrNCHA
13	YouTube	UCoxkgQebYcC7Wpnc4q5Ykzg
14	YouTube	UCtnTC07rJe8fiIoxg5xc5qg
15	Facebook	SongSneaker-105636734730124
16	Instagram	bstsneaker.store
17	Instagram	bstsneakers.store
18	Instagram	bstsneakersofficial
19	Instagram	stockxshoes_tt
20	Instagram	stockxshoes_xx2
21	Reddit	r/BSTReps

Infringing Social Media		
No.	Type	Handle
22	Reddit	r/Stockxshoescom
Network 3		
23	WhatsApp	85264329578
24	YouTube	UCbFWidqtG9P82KIW81RbNIQ
25	Facebook	COCO-SHOES-108421181587233
26	Instagram	cocoshoesjing_
27	Instagram	cocoshoesnet
28	Instagram	cocoshoesshop_
29	WeChat	18950744921
Network 4		
30	WhatsApp	8618171220597
31	WhatsApp	861886529701
32	Instagram	buykicks88
33	Instagram	nicejordansnet3
34	Instagram	shoeboxes068
35	WeChat	8618171220597
36	WeChat	861886529701
37	WhatsApp	8618086529701
Network 5		
38	WhatsApp	18396000349
39	WhatsApp	8618396000349
40	Instagram	carlkicks1
41	WeChat	carlkicks

Infringing Social Media		
No.	Type	Handle
Network 6		
42	WhatsApp	8617359057025
43	YouTube	UC-A9EoPxIEYZjAsyaRBGcjA
44	Instagram	ddkicks2009
45	Reddit	r/ddkicks
Network 7		
46	WhatsApp	16167554659
47	WhatsApp	85257671726
48	Facebook	hotkicks.cc
49	Facebook	hotkicks.org
50	Instagram	hotkicks.cc2
51	Instagram	hotkicks_official
52	Instagram	hotkicksorg.official2
53	Reddit	r/HotKicks_Offical
Network 8		
54	WhatsApp	85251750050
55	YouTube	UCRdNAICN3iK_tZjr3yrjIdA
56	Instagram	hypeunique.review
57	Instagram	hypeunique__review
Network 9		
58	WhatsApp	85368525066
59	Instagram	gslucky88
60	Instagram	kickmax0

Infringing Social Media		
No.	Type	Handle
Network 10		
61	WhatsApp	8618250518099
62	YouTube	UCLOCBVp7Np1mfjGVDtok3EA
63	Instagram	kicks_wow
64	Instagram	kicksfollow
65	Instagram	pinkkickz
66	WeChat	kickscentral
67	Reddit	r/kickscentral
Network 11		
68	WhatsApp	85253741963
69	WhatsApp	85255139716
70	WhatsApp	85291452559
71	WhatsApp	8613023858310
72	Instagram	kickwho.snkrs
73	Instagram	kwsnkrs.review
74	Instagram	shoe_reviewss
75	WeChat	kickwho
76	WeChat	kickwho-snkrs
77	Reddit	r/kickwho
78	Reddit	u/kickwho_1
Network 12		
79	WhatsApp	8613959504723
80	Instagram	kickzlucaofficial

Infringing Social Media		
No.	Type	Handle
Network 13		
81	WhatsApp	8613599017477
82	WhatsApp	8613599462933
83	Instagram	lgrose.ru
84	Instagram	lgroseru55
Network 14		
85	WhatsApp	8613459075059
86	Instagram	lkkiks_com
87	WeChat	lkkiks
Network 15		
88	WhatsApp	85254929956
89	WhatsApp	8617396500129
90	YouTube	UC_sm5K0xcii0FEZKm4TQYKQ
91	Instagram	love888kicks
92	Reddit	r/888kicks
Network 16		
93	WhatsApp	8613255911553
94	WhatsApp	8617759076897
95	Instagram	mangomeee.snkr
96	Instagram	mangomeee.snkr
97	Instagram	mangomeee2022
98	WeChat	mangofamilyshoes
99	WeChat	mangomeee

Infringing Social Media		
No.	Type	Handle
Network 17		
100	WhatsApp	85252610300
101	WhatsApp	85265997053
102	YouTube	UC3G1SHtuPYzJjtHLKfXcENw
103	Instagram	mangomeee_official
104	Instagram	mangomeeeclub
105	WhatsApp	44 7927 522960
Network 18		
106	WhatsApp	8617007357135
107	WhatsApp	8618396001806
108	Instagram	monicasneaker.ccc
109	WeChat	8618396001806
110	Phone	8617189364043
111	Reddit	r/monicasneaker
112	Reddit	u/og_monica
Network 19		
113	WhatsApp	8613266816871
114	WhatsApp	8618183338814
115	Instagram	mrhou_4898
116	WeChat	mr-hou4898
Network 20		
117	WhatsApp	18105229793
118	WhatsApp	8613799614052

Infringing Social Media		
No.	Type	Handle
119	Instagram	official_muksstore
Network 21		
120	WhatsApp	8613328838183
121	Instagram	rarerepclothing
122	Instagram	rarerepsneaker2
123	Instagram	rarerepsneaker3
124	WeChat	13328838183
Network 22		
125	WhatsApp	8618879144396
126	Instagram	ryannorman4
Network 23		
127	WhatsApp	15659806542
128	WhatsApp	85256109281
129	WhatsApp	8615659806542
130	YouTube	UCsn9Ca6lOjScas9rlEeLrXA
131	YouTube	stockxpro
132	Instagram	stockxpro.usa
133	Instagram	stockxprosneakers
134	WeChat	stockxpro-vip-alice
135	Reddit	r/StockxPro
136	Reddit	r/fashionrep
137	Reddit	r/stockxpro
138	Reddit	u/stockxproservice

Infringing Social Media		
No.	Type	Handle
Network 24		
139	WhatsApp	8613015983512
140	WhatsApp	8618650212083
141	YouTube	UCw_A-4QUn_CEKM8cfMQpjaQ
142	Instagram	timsneakerscom
143	WeChat	8613015983512
144	Reddit	r/Timsneakers
145	Reddit	r/timsneakers
146	Reddit	u/timsneakers_com
Network 25		
147	WhatsApp	85264265446
148	WhatsApp	85294300508
149	Instagram	ubuysneakers
150	Reddit	r/UBuySneakers
151	Reddit	r/ubuysneakers
152	Reddit	u/ubuysneakers
Network 26		
153	WhatsApp	8617767113866
154	Instagram	ulrica688888
Network 27		
155	WhatsApp	447594776750
156	WhatsApp	85253806268
157	WhatsApp	85267237597

Infringing Social Media		
No.	Type	Handle
158	WhatsApp	8618039014337
159	YouTube	UCBvFg4ZvGFgDjGcjkhd__IA
160	YouTube	UCvCL_rkEWJwi4V4lfzoWHZA
161	Facebook	hypeshoes.co
162	Instagram	bmlinshoes1
163	Instagram	hypeshoesco
164	Instagram	love.nicekicks
165	Instagram	lovekicks.vip
166	Instagram	stockx_kicks_
167	Reddit	r/HYPESHOES_co
168	Reddit	r/Stockxkicks
Network 28		
169	WhatsApp	85260981515
170	WhatsApp	8618086465089
171	WhatsApp	861886465089
172	Instagram	footskicks8
173	WeChat	861886465089
Network 29		
174	WhatsApp	8618959235127
Network 30		
175	WhatsApp	18389001437
176	WhatsApp	85252246012
177	YouTube	UCYxgYy8bBebOmC0X-v5YsDg

Infringing Social Media		
No.	Type	Handle
178	Reddit	r/crewKickr3ps
179	Reddit	u/crewKICK_
Network 31		
180	WhatsApp	8618107269391
181	Instagram	dopesneaker.co
182	Instagram	dopesneakerco
183	WeChat	8618107269391
Network 32		
184	WhatsApp	17477671215
185	WhatsApp	7477671215
186	WhatsApp	85255465409
187	WhatsApp	85255465492
188	WhatsApp	8615060357238
189	WhatsApp	9452646188
190	YouTube	UCWqUfBzNE3aCVtMk45T75aw
191	Instagram	fkz.plug
192	Instagram	fkzonfire
193	WeChat	ln5plug
194	Reddit	r/Flightkickz
195	Reddit	r/flightkickz
Network 33		
196	WhatsApp	639053615408
197	WhatsApp	85266080171

Infringing Social Media		
No.	Type	Handle
198	Instagram	gmkrose
199	WeChat	gmktina
200	Reddit	r/gmksub
Network 34		
201	WhatsApp	85266617105
202	Facebook	chancy.green.52
203	Instagram	hot20023
204	Phone	852 5347 4599
Network 35		
205	WhatsApp	17079311942
206	WhatsApp	85267335067
207	Instagram	hypeboosts
208	Instagram	tejasrcpilot
209	WeChat	hypeboosts
210	Reddit	r/hypeboosts
Network 36		
211	Whatsapp	85253072903
212	YouTube	UC71kLLDhnW6aDGytprE2aPA
213	Instagram	jdfootsneaker
214	Instagram	jdfootstore
Network 37		
215	Facebook	PK-Shoes-109037267542255
Network 38		

Infringing Social Media		
No.	Type	Handle
216	Instagram	popshoeofficial
217	Phone	3233025706
Network 39		
218	Whatsapp	8529286003
219	Whatsapp	8618059868271
220	YouTube	UCjWueb4AHR6SYnsTcqRqBVg
221	Instagram	aceereps
222	Instagram	rep.education.center
223	Instagram	taosneakers_ins
Network 40		
224	Whatsapp	16466377762
225	Whatsapp	8613607545746
226	Whatsapp	8613666905331
227	Instagram	uabat.ru
228	Instagram	uabat0
229	Reddit	r/UaBat
230	Reddit	r/uabat
231	Reddit	u/uabat
Network 41		
232	Whatsapp	19565163160
233	YouTube	UC7yOIAzmFxxvSssIVYbfXBpw
234	Instagram	pkstock.x
235	Reddit	uabatman.com

Infringing Social Media		
No.	Type	Handle
Network 42		
236	Whatsapp	8617359409448
237	Whatsapp	8618605016686
238	Instagram	sneakerwillshop
239	Reddit	r/WillSneakers
Network 43		
240	Whatsapp	8613529089262
241	Instagram	luckshoesru3
242	Reddit	r/luckshoesSneakers
243	Reddit	u/luckshoes
Network 44		
244	Whatsapp	18059533333
245	Whatsapp	19959503333
246	Whatsapp	8617759018888
247	Instagram	pkdoingthebest2008
248	Reddit	r/PKDoingBest
249	Reddit	u/PKDoingBest
Network 45		
250	Whatsapp	8613288881136
251	Instagram	jaskicks2008
252	Reddit	r/jaskicks2008
253	Reddit	u/JASKicks2008
Network 46		

Infringing Social Media		
No.	Type	Handle
254	Whatsapp	85261546060
255	Instagram	coptop.top
Network 47		
256	Whatsapp	85269248974
257	Whatsapp	85292478434
258	Facebook	m1sneakers
259	Instagram	m1sneakers01
Network 48		
260	Whatsapp	85253055346
261	Whatsapp	85256157445
262	Whatsapp	85268421175
263	Instagram	bomblines_kicks
264	WeChat	bomblines-cc
265	Reddit	r/BombLine
Network 49		
266	Instagram	ebuysneakers
267	Phone	86 138 5985 5080

EXHIBIT 5

Defendants' Known Names	
No.	Known Defendant Names and Merchant Names
Network 1	
1	Shiby NY Inc.
2	Ming Fu Hong Trading Limited
Network 2	
3	\$ytrading616
4	Mr. Wang
Network 5	
5	Joom E-Commerce Company Limited
Network 7	
6	GDLEYU INC.
Network 8	
7	GDLEYU Inc.
Network 9	
8	EFX FASHION INC.
Network 11	
9	misstylea
Network 12	
10	厦门同安区东虹启贸易有限公司
11	Joom E-Commerce Company Limited
Network 13	
12	Guoxiong Lin
Network 14	
13	Xianguo Zhou

Defendants' Known Names	
No.	Known Defendant Names and Merchant Names
14	Bo Ying Trading Hong Kong Limited
Network 16	
15	MIKA TECHNOLOGY CO., LIMITED
Network 18	
16	Ming Fu Hong Trading Limited
Network 19	
17	Bo Ying Trading Hong Kong Limited
Network 20	
18	刘永乐
19	Bo Ying Trading Hong Kong Limited
Network 21	
20	Sing Ying Tradind Limited
Network 25	
21	Casnda Corp Limited-B2C
Network 26	
22	Bo Ying Trading Hong Kong Limited
Network 28	
23	Star EFX Fashion Inc.
Network 29	
24	\$Kaideninc616
Network 30	
25	WTP*stepsupshoes
Network 32	

Defendants' Known Names	
No.	Known Defendant Names and Merchant Names
26	志雄 祁
Network 33	
27	郑会见
Network 34	
28	Joom E-Commerce Company Limited
Network 35	
29	EKO DG TRADING INC.
Network 37	
30	Vkomall
31	One Pick (HK) Limited
Network 38	
32	通城佩娜百货店
33	PEINABAXNYJ
34	Bo Ying Trading Hong Kong Limited
Network 41	
35	\$Kaideninc616
Network 42	
36	莆田百耀科技有限公司
Network 43	
37	丽明 林
Network 44	
38	建辉 刘
Network 45	

Defendants' Known Names	
No.	Known Defendant Names and Merchant Names
39	钟小青
Network 46	
40	COPTOP
41	陈珍琴
Network 47	
42	Casnda Corp Limited-B2C
Network 48	
43	Bo Ying Trading Hong Kong Limited
Network 50	
44	SP XYLAR STUDIO
Network 51	
45	\$DedianFang

EXHIBIT 6

Network Damages By Category			
No.	Gender	Category	Mark Infringed
Defendants Network 1			
1	Men	Basketball	Air Jordan*
2			Jumpman
3			Jumpman*
4			Nike Air And Swoosh
5			Nike*
6		Boots	Nike Air*
7			Nike And Swoosh
8			Nike*
9			Swoosh
10		Lifestyle	Air Jordan*
11			Dunk Sole
12			Dunk*
13			Nike Air Slanted And Swoosh
14			Nike And Swoosh
15			Nike*
16			Swoosh
17			Waffle*
18			Wings
19	Women	Basketball	Air Jordan*
20			Jumpman
21			Jumpman*
22		Lifestyle	Dunk Low

Network Damages By Category			
No.	Gender	Category	Mark Infringed
23			Dunk Sole
24			Dunk*
25			Nike And Swoosh
26			Nike*
27			Swoosh
28			Swoosh*
TOTAL STATUTORY DAMAGES (Defendants Network 1): \$28,000,000 (28 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 2			
29	Men	Basketball	Air Jordan*
30			Jumpman
31			Nike*
32			Swoosh
33		Converse	All Star
34			Converse Ankle Design
35			Converse Circle
36			Converse High Top
37			Converse Mid Sole
38			Converse Sole
39			Converse Toe
40			Converse*
41			Ct Signature
42			Star
43			Star And Chevron

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
44		Lifestyle	Afl High	
45			Air Force 1*	
46			Air Jordan*	
47			Airmax*	
48			Dunk High	
49			Dunk Low	
50			Dunk Sole	
51			Dunk*	
52			Nike Air And Swoosh	
53			Nike Air Slanted And Swoosh	
54			Nike Air*	
55			Nike And Swoosh	
56			Nike Over Swoosh	
57			Nike Vapor*	
58			Nike*	
59			Presto*	
60			Swoosh	
61			Waffle*	
62			Wings	
63			Running	Flyknit*
64				Nike Air*
65				Nike*
66				Vapormax*

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
67	Women	Basketball	Air Jordan*	
68			Jumpman	
69			Nike*	
70			Swoosh	
71		Lifestyle	Air Jordan*	
72			Airmax*	
73			Dunk Low	
74			Dunk Sole	
75			Dunk*	
76			Jumpman	
77			Nike Air Slanted And Swoosh	
78			Nike Air*	
79			Nike And Swoosh	
80			Nike Over Swoosh	
81			Nike Vapor*	
82			Nike*	
83			Presto*	
84			Spiral	
85			Swoosh	
86			Waffle*	
87			Wings	
88			Running	Flyknit*
89				Nike Air*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
90			Nike*
91			Vapormax*
TOTAL STATUTORY DAMAGES (Defendants Network 2): \$63,000,000 (63 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 3			
92	Men	Basketball	Air Jordan*
93			Jumpman
94			Jumpman*
95			Nike And Swoosh
96		Lifestyle	Af1 Low
97			Af1 Sole
98			Air Force 1*
99			Airmax*
100			Dunk Low
101			Dunk Sole
102			Dunk*
103			Nike Air And Swoosh
104			Nike Air Slanted And Swoosh
105			Nike Air*
106			Nike And Swoosh
107			Nike Over Swoosh
108			Nike*
109			Swoosh
110			Swoosh*

Network Damages By Category					
No.	Gender	Category	Mark Infringed		
111	Women	Basketball	Air Jordan*		
112			Jumpman		
113			Jumpman*		
114		Lifestyle	Afl Low		
115			Afl Sole		
116			Air Force 1*		
117			Airmax*		
118			Dunk Low		
119			Dunk Sole		
120			Dunk*		
121			Nike Air Slanted And Swoosh		
122			Nike Air*		
123			Nike And Swoosh		
124			Nike Over Swoosh		
125			Nike*		
126			Spiral		
127			Swoosh		
128			Youth	Basketball	Jumpman
129				Lifestyle	Air Force 1*
130					Dunk Sole
131					Jumpman
132					Nike And Swoosh
133					Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
134			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 3): \$43,000,000,000 (43 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 4			
135	Men	Basketball	Air Jordan*
136			Elite*
137			Jumpman
138			Jumpman*
139			Lebron
140			Nike Air And Swoosh
141			Nike*
142			Swoosh
143			Wings
144			Boots
145		Nike Air*	
146		Nike And Swoosh	
147		Nike*	
148		Swoosh	
149		Lifestyle	Afl High
150			Afl Low
151			Afl Mid
152			Afl Sole
153			Air Force 1*
154			Air Jordan*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
155			Air270*
156			Airmax*
157			Am 95
158			Cortez*
159			Dunk High
160			Dunk Low
161			Dunk Sole
162			Dunk*
163			Nike Air And Swoosh
164			Nike Air Slanted And Swoosh
165			Nike Air*
166			Nike And Swoosh
167			Nike Over Swoosh
168			Nike Vapor*
169			Nike*
170			Spiral
171			Swoosh
172			Waffle*
173			Wings
174		Running	Nike Air*
175			Nike Vapor*
176			Nike*
177			Spiral

Network Damages By Category			
No.	Gender	Category	Mark Infringed
178			Swoosh
179			Vapormax*
180			Vomero*
181	Women	Basketball	Air Jordan*
182			Elite*
183			Jumpman
184			Jumpman*
185			Lebron
186			Nike Air And Swoosh
187			Nike And Swoosh
188			Nike*
189			Wings
190			Boots
191		Air Force 1*	
192		Nike And Swoosh	
193		Nike*	
194		Swoosh	
195		Lifestyle	Afl High
196			Afl Low
197			Afl Mid
198			Afl Sole
199			Air Force 1*
200			Air Jordan*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
201			Air270*
202			Airmax*
203			Am 95
204			Cortez*
205			Dunk High
206			Dunk Low
207			Dunk Sole
208			Dunk*
209			Just Do It*
210			Nike Air And Swoosh
211			Nike Air Slanted And Swoosh
212			Nike Air*
213			Nike And Swoosh
214			Nike Over Swoosh
215			Nike Vapor*
216			Nike*
217			Spiral
218			Swoosh
219			Waffle*
220			Wings
221		Running	Flyknit*
222			Nike Air*
223			Nike Vapor*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
224			Nike*
225			Spiral
226			Swoosh
227			Vapormax*
228			Vomero*
229	Youth	Lifestyle	Dunk Low
230			Dunk Sole
231			Dunk*
232			Nike And Swoosh
233			Nike*
234			Swoosh
TOTAL STATUTORY DAMAGES (Defendants Network 4): \$100,000,000 (100 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 5			
235	Men	Basketball	Jumpman
236			Nike Air And Swoosh
237			Nike And Swoosh
238		Lifestyle	Afl Low
239			Air Force 1*
240			Airmax*
241			Dunk Sole
242			Dunk*
243			Nike Air And Swoosh
244			Nike Air Slanted And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
245			Nike Air*
246			Nike And Swoosh
247			Nike Vapor*
248			Nike*
249			Presto*
250			Swoosh
251			Waffle*
252			Wings
253	Women	Lifestyle	Afl Low
254			Afl Sole
255			Air Force 1*
256			Nike Air And Swoosh
257			Nike Air*
258			Nike And Swoosh
259			Nike*
260			Swoosh
261			Waffle*
TOTAL STATUTORY DAMAGES (Defendants Network 5): \$27,000,000 (27 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 6			
262	Men	Basketball	Air Jordan*
263			Jumpman
264			Jumpman*
265			Nike Air And Swoosh

Network Damages By Category					
No.	Gender	Category	Mark Infringed		
266		Boots	Nike And Swoosh		
267			Swoosh		
268		Lifestyle	Afl Low		
269			Afl Sole		
270			Air Force 1*		
271			Air Jordan*		
272			Airmax*		
273			Dunk Low		
274			Dunk Sole		
275			Dunk*		
276			Nike Air And Swoosh		
277			Nike Air*		
278			Nike And Swoosh		
279			Nike Over Swoosh		
280			Nike*		
281			Swoosh		
282			Waffle*		
283			Wings		
284			Women	Basketball	Air Jordan*
285					Jumpman
286				Lifestyle	Air Force 1*
287					Air Jordan*
288		Dunk Sole			

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
289			Nike Air Slanted And Swoosh	
290			Nike And Swoosh	
291			Wings	
TOTAL STATUTORY DAMAGES (Defendants Network 6): \$30,000,000 (30 Marks Per Types of Good Infringed x \$1,000,000)				
Defendants Network 7				
292	Men	Basketball	Air Jordan*	
293			Jumpman	
294			Jumpman*	
295			Nike Air And Swoosh	
296		Lifestyle	Afl Mid	
297			Air Force 1*	
298			Airmax*	
299			Dunk Low	
300			Dunk*	
301			Jumpman	
302			Nike Air Slanted And Swoosh	
303			Nike And Swoosh	
304			Nike Over Swoosh	
305			Nike*	
306			Presto*	
307			Swoosh	
308			Wings	
309			Running	Nike And Swoosh

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
310			Nike*	
311			Swoosh	
312			Vapormax*	
313	Women	Basketball	Nike And Swoosh	
314			Swoosh	
315		Lifestyle	Afl Mid	
316			Air Force 1*	
317			Air Jordan*	
318			Airmax*	
319			Dunk Low	
320			Dunk*	
321			Nike And Swoosh	
322			Nike Over Swoosh	
323			Nike*	
324			Presto*	
325			Spiral	
326			Swoosh	
327			Running	Nike And Swoosh
328				Nike*
329				Swoosh
330				Vapormax*
331		Youth	Basketball	Air Jordan*
332	Jumpman			

Network Damages By Category			
No.	Gender	Category	Mark Infringed
333		Lifestyle	Air Force 1*
334			Jumpman
335			Swoosh
336			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 7): \$45,000,000 (45 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 8			
337	Men	Basketball	Air Jordan*
338			Jumpman
339			Jumpman*
340			Nike Air And Swoosh
341		Boots	Airmax*
342			Nike And Swoosh
343			Nike*
344			Swoosh
345		Jersey	Dri-Fit*
346			Nike*
347			Swoosh
348		Lifestyle	Afl Sole
349			Air Jordan*
350			Airmax*
351			Dunk Sole
352			Dunk*
353			Nike Air Slanted And Swoosh

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
354			Nike Air*	
355			Nike And Swoosh	
356			Nike Vapor*	
357			Nike*	
358			Presto*	
359			Swoosh	
360			Waffle*	
361			Wings	
362			Pants	Air Jordan*
363				Jumpman
364		Running	Airmax*	
365			Nike*	
366			Swoosh	
367			Vapormax*	
368		Shirt	Air Jordan*	
369			Nike And Swoosh	
370			Nike*	
371			Swoosh	
372		Women	Basketball	Air Jordan*
373				Jumpman
374	Nike Air And Swoosh			
375	Lifestyle		Afl Sole	
376			Air Force 1*	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
377			Air Jordan*
378			Airmax*
379			Dunk Sole
380			Dunk*
381			Nike Air Slanted And Swoosh
382			Nike Air*
383			Nike And Swoosh
384			Nike Over Swoosh
385			Nike*
386			Presto*
387			Swoosh
388			Waffle*
389			Wings
390		Running	Airmax*
391			Nike*
392			Swoosh
393			Vapormax*
TOTAL STATUTORY DAMAGES (Defendants Network 8): \$57,000,000 (57 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 9			
394	Men	Basketball	Jumpman
395			Lebron
396			Nike Air*
397			Nike And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
398			Nike*
399			Swoosh
400			Wings
401		Boots	Nike Air*
402			Nike And Swoosh
403			Nike*
404			Swoosh
405		Converse	Converse Circle
406			Converse High Top
407			Converse Mid Sole
408			Converse Toe
409			Converse*
410			Star
411		Lifestyle	Afl Sole
412			Air Force 1*
413			Air Jordan*
414			Air270*
415			Airmax*
416			Am 95
417			Dunk Sole
418			Dunk*
419			Flyknit*
420			Just Do It*

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
421			Nike Air*	
422			Nike And Swoosh	
423			Nike Over Swoosh	
424			Nike Vapor*	
425			Nike*	
426			Presto*	
427			Swoosh	
428			Waffle*	
429			Wings	
430			Running	Flyknit*
431		Nike Air*		
432		Nike Over Swoosh		
433		Nike*		
434		Swoosh		
435		Vapormax*		
436		Women	Basketball	Elite*
437				Nike Air*
438				Nike And Swoosh
439				Nike*
440				Swoosh
441	Boots		Air Force 1*	
442			Nike Air Slanted And Swoosh	
443			Nike*	

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
444			Swoosh	
445		Converse	All Star	
446			Converse Circle	
447			Converse High Top	
448			Converse Mid Sole	
449			Converse Sole	
450			Converse Toe	
451			Converse*	
452			Ct Signature	
453			Star	
454			Lifestyle	Afl Sole
455				Air Force 1*
456		Air270*		
457		Airmax*		
458		Am 95		
459		Dunk Sole		
460		Dunk*		
461		Flyknit*		
462		Just Do It*		
463		Nike Air And Swoosh		
464		Nike Air Slanted And Swoosh		
465		Nike Air*		
466		Nike And Swoosh		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
467			Nike Over Swoosh
468			Nike Vapor*
469			Nike*
470			Presto*
471			Swoosh
472			Waffle*
473		Running	Flyknit*
474			Just Do It*
475			Mercurial*
476			Nike Air*
477			Nike Over Swoosh
478			Nike Vapor*
479			Nike*
480			Swoosh
481			Vapormax*
482	Youth	Basketball	Air Jordan*
483			Jumpman
484			Nike Air And Swoosh
485			Nike And Swoosh
486			Nike*
487		Lifestyle	Dunk Sole
488			Nike Air Slanted And Swoosh
489			Nike And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
490			Swoosh
491			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 9): \$98,000,000 (98 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 10			
492	Men	Basketball	Air Jordan*
493			Jumpman
494			Jumpman*
495			Nike Air And Swoosh
496			Nike And Swoosh
497		Boots	Nike Air*
498			Nike And Swoosh
499			Nike*
500			Swoosh
501		Converse	All Star
502			Converse Circle
503			Converse Mid Sole
504			Converse Sole
505			Converse Toe
506			Converse*
507			Star
508			Star And Chevron
509		Lifestyle	Afl Low
510			Afl Sole

Network Damages By Category			
No.	Gender	Category	Mark Infringed
511			Air Force 1*
512			Air Jordan*
513			Airmax*
514			Dunk Sole
515			Dunk*
516			Nike Air Slanted And Swoosh
517			Nike Air*
518			Nike And Swoosh
519			Nike Over Swoosh
520			Nike Vapor*
521			Nike*
522			Presto*
523			Swoosh
524			Waffle*
525			Wings
526		Running	Nike And Swoosh
527			Swoosh
528			Vapormax*
529	Women	Basketball	Air Jordan*
530			Jumpman
531			Nike Air And Swoosh
532		Lifestyle	Afl Sole
533			Air Force 1*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
534			Air Jordan*
535			Airmax*
536			Dunk Sole
537			Dunk*
538			Nike Air And Swoosh
539			Nike Air Slanted And Swoosh
540			Nike Air*
541			Nike And Swoosh
542			Nike Over Swoosh
543			Nike Vapor*
544			Nike*
545			Presto*
546			Swoosh
547			Waffle*
548			Wings
549		Running	Just Do It*
550			Nike Air*
551			Nike And Swoosh
552			Nike*
553			Swoosh
554			Vapormax*
555	Youth	Lifestyle	Air Jordan*
556			Dunk Sole

Network Damages By Category			
No.	Gender	Category	Mark Infringed
557			Jumpman
558			Nike Air Slanted And Swoosh
559			Nike And Swoosh
560			Swoosh
561			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 10): \$70,000,000 (70 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 11			
562	Men	Basketball	Air Jordan*
563			Jumpman
564			Jumpman*
565		Boots	Nike Air*
566			Nike And Swoosh
567			Nike*
568			Swoosh
569		Converse	All Star
570			Converse Ankle Design
571			Converse Circle
572			Converse High Top
573			Converse Mid Sole
574			Converse Sole
575			Converse Toe
576			Converse*
577			Star

Network Damages By Category			
No.	Gender	Category	Mark Infringed
578			Star And Chevron
579		Jacket	Acg
580			Jumpman
581			Nike Air And Swoosh
582			Nike And Swoosh
583			Nike*
584			Swoosh
585			Jersey
586		Swoosh	
587		Lifestyle	Afl Sole
588			Air Force 1*
589			Air Jordan*
590			Airmax*
591			Cortez*
592			Dunk Low
593			Dunk Sole
594			Dunk*
595			Jumpman*
596			Nike And Swoosh
597			Nike Over Swoosh
598			Nike*
599			Swoosh
600		Swoosh*	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
601			Wings
602		Pants	Nike And Swoosh
603			Nike*
604		Running	Airmax*
605			Just Do It*
606			Nike Air*
607			Nike And Swoosh
608			Nike*
609			Swoosh
610			Swoosh*
611			Vapormax*
612			Shirt
613		Shorts	Jumpman
614			Nike*
615			Swoosh
616		Sweatshirt	Nike*
617			Swoosh
618	Women	Running	Airmax*
619			Flyknit*
620			Just Do It*
621			Nike Air*
622			Nike*
623			Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
624	Youth	Basketball	Air Jordan*
625			Jumpman
626		Lifestyle	Air Jordan*
627			Dunk Sole
628			Nike Air Slanted And Swoosh
629			Nike And Swoosh
630			Swoosh
631			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 11): \$70,000,000 (70 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 12			
632	Men	Basketball	Lebron
633			Nike Air*
634			Nike And Swoosh
635			Nike*
636			Swoosh
637		Boots	Acg
638			Nike Air*
639			Nike And Swoosh
640			Nike*
641			Swoosh
642		Lifestyle	Afl Low
643			Afl Sole
644			Airmax*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
645			Cortez*
646			Dunk Sole
647			Dunk*
648			Nike Air And Swoosh
649			Nike Air Slanted And Swoosh
650			Nike And Swoosh
651			Nike Vapor*
652			Nike*
653			Presto*
654			Swoosh
655			Waffle*
656		Running	Airmax*
657			Nike And Swoosh
658			Nike*
659			Swoosh
660			Vapormax*
661	Women	Basketball	Nike Air*
662			Nike And Swoosh
663			Nike*
664			Swoosh
665		Lifestyle	Afl Low
666			Afl Sole
667			Airmax*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
668			Cortez*
669			Dunk Sole
670			Dunk*
671			Nike And Swoosh
672			Nike Vapor*
673			Nike*
674			Presto*
675			Swoosh
676			Waffle*
677		Running	Airmax*
678			Spiral
679			Swoosh
680			Vapormax*
TOTAL STATUTORY DAMAGES (Defendants Network 12): \$49,000,000 (49 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 13			
681	Men	Basketball	Air Jordan*
682			Jumpman
683			Jumpman*
684			Lebron
685			Nike Air And Swoosh
686			Nike Air*
687			Nike And Swoosh
688			Nike*

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
689			Swoosh	
690			Wings	
691		Boots	Air Jordan*	
692			Nike Air*	
693			Nike And Swoosh	
694			Nike*	
695			Swoosh	
696			Converse	Air Jordan*
697				All Star
698		Converse Ankle Design		
699		Converse Circle		
700		Converse High Top		
701		Converse Mid Sole		
702		Converse Sole		
703		Converse Toe		
704		Converse*		
705		Ct Signature		
706		Nike*		
707		Star		
708		Lifestyle	Air Jordan*	
709			Airmax*	
710			Dunk High	
711			Dunk Sole	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
712			Dunk*
713			Nike Air Slanted And Swoosh
714			Nike Air*
715			Nike And Swoosh
716			Nike Over Swoosh
717			Nike Vapor*
718			Nike*
719			Presto*
720			Swoosh
721			Waffle*
722			Wings
723		Running	Air Jordan*
724			Airmax*
725			Just Do It*
726			Nike Air*
727			Nike And Swoosh
728			Nike*
729			Swoosh
730			Vapormax*
731	Women	Lifestyle	Air Jordan*
732			Airmax*
733			Dunk Sole
734			Dunk*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
735			Nike And Swoosh
736			Nike Vapor*
737			Nike*
738			Swoosh
739			Waffle*
740		Running	Air Jordan*
741			Airmax*
742			Nike*
743			Swoosh
744			Vapormax*
TOTAL STATUTORY DAMAGES (Defendants Network 13): \$64,000,000 (64 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 14			
745	Men	Basketball	Air Jordan*
746			Converse*
747			Jumpman
748			Nike Air And Swoosh
749			Nike Air*
750			Nike And Swoosh
751			Nike*
752		Boots	Acg
753			Air Jordan*
754			Converse*
755			Nike Air*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
756			Nike*
757			Swoosh
758		Converse	Air Jordan*
759			All Star
760			Converse
761			Converse Ankle Design
762			Converse Circle
763			Converse High Top
764			Converse Low Top
765			Converse Mid Sole
766			Converse Sole
767			Converse Toe
768			Converse*
769			Ct Signature
770			Nike*
771			Star
772			Star And Chevron
773			Star And Chevron Placement
774		Jacket	Air Jordan*
775			Converse*
776			Nike And Swoosh
777			Nike*
778		Lifestyle	Afl Low

Network Damages By Category			
No.	Gender	Category	Mark Infringed
779			Afl Sole
780			Air Jordan*
781			Airmax*
782			Converse*
783			Cortez*
784			Dunk Sole
785			Dunk*
786			Just Do It*
787			Nike Air And Swoosh
788			Nike Air Slanted And Swoosh
789			Nike Air*
790			Nike And Swoosh
791			Nike Over Swoosh
792			Nike Vapor*
793			Nike*
794			Presto*
795			Star
796			Swoosh
797			Waffle*
798			Wings
799		Running	Air Jordan*
800			Converse*
801			Flyknit*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
802			Just Do It*
803			Nike Air*
804			Nike Over Swoosh
805			Nike*
806			Swoosh
807			Vapormax*
808			Vomero*
809	Women	Running	Air Jordan*
810			Converse*
811			Flyknit*
812			Nike Air*
813			Nike*
814			Swoosh
815	Youth	Basketball	Air Jordan*
816			Converse*
817			Nike Air And Swoosh
818			Nike And Swoosh
819			Nike*
820		Lifestyle	Afl Low
821			Afl Sole
822			Air Jordan*
823			Air270*
824			Airmax*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
825			Converse*
826			Cortez*
827			Dunk Sole
828			Dunk*
829			Nike Air And Swoosh
830			Nike Air Slanted And Swoosh
831			Nike Air*
832			Nike And Swoosh
833			Nike Over Swoosh
834			Nike Vapor*
835			Nike*
836			Presto*
837			Swoosh
838			Vapormax*
839			Waffle*
840			Wings
841		Running	Air Jordan*
842			Converse*
843			Flyknit*
844			Nike*
845			Swoosh
846			Vapormax*
TOTAL STATUTORY DAMAGES (Defendants Network 14): \$102,000,000 (102 Marks Per Types of Good Infringed x \$1,000,000)			

Network Damages By Category			
No.	Gender	Category	Mark Infringed
Defendants Network 15			
847	Men	Basketball	Air Jordan*
848			Jumpman
849			Jumpman*
850			Nike Air And Swoosh
851			Nike*
852		Boots	Nike Air*
853			Nike And Swoosh
854			Nike*
855			Swoosh
856		Lifestyle	Afl Low
857			Afl Sole
858			Airmax*
859			Dunk Low
860			Dunk Sole
861			Dunk*
862			Nike Air And Swoosh
863			Nike Air Slanted And Swoosh
864			Nike Air*
865			Nike And Swoosh
866			Nike Over Swoosh
867	Nike*		
868	Presto*		

Network Damages By Category					
No.	Gender	Category	Mark Infringed		
869			Swoosh		
870			Wings		
871	Women	Basketball	Air Jordan*		
872			Jumpman		
873		Lifestyle	Dunk Low		
874			Dunk Sole		
875			Dunk*		
876			Nike Air Slanted And Swoosh		
877			Nike And Swoosh		
878			Nike*		
879			Swoosh		
880			Wings		
TOTAL STATUTORY DAMAGES (Defendants Network 15): \$34,000,000 (34 Marks Per Types of Good Infringed x \$1,000,000)					
Defendants Network 16					
881		Men	Basketball	Air Jordan*	
882	Jumpman				
883	Jumpman*				
884	Nike Air And Swoosh				
885	Nike And Swoosh				
886	Lifestyle		Afl Low		
887			Afl Sole		
888			Air Jordan*		
889			Airmax*		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
890			Cortez*
891			Dunk Low
892			Dunk Sole
893			Dunk*
894			Nike Air Slanted And Swoosh
895			Nike Air*
896			Nike And Swoosh
897			Nike Over Swoosh
898			Nike Vapor*
899			Nike*
900			Swoosh
901			Waffle*
902			Wings
903	Women	Lifestyle	Air Jordan*
904			Dunk Sole
905			Nike Air Slanted And Swoosh
906			Nike And Swoosh
907			Nike*
908			Swoosh
909			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 16): \$29,000,000 (29 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 17			
910	Men	Basketball	Air Jordan*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
911			Durant
912			Jumpman
913			M
914			Nike Air And Swoosh
915			Nike*
916			Swoosh
917		Lifestyle	Afl Low
918		Lifestyle	Afl Sole
919		Lifestyle	Air Force 1*
920		Lifestyle	Air Jordan*
921		Lifestyle	Airmax*
922		Lifestyle	Cortez*
923		Lifestyle	Dunk Low
924		Lifestyle	Dunk Sole
925		Lifestyle	Dunk*
926		Lifestyle	Nike Air And Swoosh
927		Lifestyle	Nike Air Slanted And Swoosh
928		Lifestyle	Nike Air*
929		Lifestyle	Nike And Swoosh
930		Lifestyle	Nike Over Swoosh
931		Lifestyle	Nike Vapor*
932		Lifestyle	Nike*
933		Lifestyle	Presto*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
934		Running	Swoosh
935			Waffle*
936			Airmax*
937			Flyknit*
938			Nike Air*
939			Nike*
940			Swoosh
941			Vapormax*
942			Women
943	Jumpman		
944	Lifestyle	Afl Low	
945		Afl Sole	
946		Air Force 1*	
947		Air Jordan*	
948		Dunk Sole	
949		Jumpman	
950		Nike Air Slanted And Swoosh	
951		Nike Air*	
952		Nike And Swoosh	
953		Nike*	
954		Swoosh	
955		Wings	
TOTAL STATUTORY DAMAGES (Defendants Network 17): \$46,000,000 (46 Marks Per Types of Good Infringed x \$1,000,000)			

Network Damages By Category			
No.	Gender	Category	Mark Infringed
Defendants Network 18			
956	Men	Basketball	Air Jordan*
957			Jumpman
958			Jumpman*
959			Nike Air And Swoosh
960			Nike And Swoosh
961			Nike*
962			Boots
963		Nike And Swoosh	
964		Nike*	
965		Swoosh	
966		Lifestyle	Afl Low
967			Afl Sole
968			Air Force 1*
969			Air Jordan*
970			Airmax*
971			Dunk High
972			Dunk Low
973			Dunk Sole
974			Dunk*
975			Nike Air And Swoosh
976	Nike Air*		
977	Nike And Swoosh		

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
978			Nike Over Swoosh	
979			Nike Vapor*	
980			Nike*	
981			Presto*	
982			Swoosh	
983			Waffle*	
984			Wings	
985			Running	Nike Air*
986		Nike*		
987		Swoosh		
988		Vapormax*		
989		Women	Basketball	Air Jordan*
990				Jumpman
991			Lifestyle	Dunk Low
992	Dunk Sole			
993	Dunk*			
994	Nike And Swoosh			
995	Nike*			
996	Swoosh			
TOTAL STATUTORY DAMAGES (Defendants Network 18): \$41,000,000 (41 Marks Per Types of Good Infringed x \$1,000,000)				
Defendants Network 19				
997	Men	Basketball	Air Jordan*	
998			Airmax*	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
999			Jumpman
1000			Lebron
1001			Nike Air And Swoosh
1002			Nike Air*
1003			Nike And Swoosh
1004			Nike*
1005			Swoosh
1006		Boots	Nike And Swoosh
1007			Swoosh
1008		Converse	All Star
1009			Converse Ankle Design
1010			Converse Circle
1011			Converse High Top
1012			Converse Mid Sole
1013			Converse Toe
1014			Converse*
1015			Ct Signature
1016			Star
1017		Lifestyle	Afl High
1018			Afl Mid
1019			Afl Sole
1020			Air Jordan*
1021			Airmax*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1022			Cortez*
1023			Dunk High
1024			Dunk Low
1025			Dunk Sole
1026			Dunk*
1027			Just Do It*
1028			Nike Air And Swoosh
1029			Nike Air Slanted And Swoosh
1030			Nike Air*
1031			Nike And Swoosh
1032			Nike*
1033			Presto*
1034			Swoosh
1035			Waffle*
1036			Wings
1037		Running	Airmax*
1038		Running	Flyknit*
1039		Running	Nike Air*
1040		Running	Nike*
1041		Running	Spiral
1042		Running	Swoosh
1043		Running	Vapormax*
1044		Running	Vomero*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1045	Women	Basketball	Air Jordan*
1046			Jumpman
1047			Jumpman*
1048		Lifestyle	Air Jordan*
1049			Dunk Low
1050			Dunk Sole
1051			Dunk*
1052			Jumpman
1053			Nike Air Slanted And Swoosh
1054			Nike And Swoosh
1055			Nike*
1056			Swoosh
1057			Wings
1058			Youth
1059	Jumpman		
1060	Lifestyle	Afl Low	
1061		Afl Sole	
1062		Air Jordan*	
1063		Dunk Low	
1064		Dunk Sole	
1065		Dunk*	
1066		Jumpman	
1067		Nike Air Slanted And Swoosh	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1068			Nike Air*
1069			Nike And Swoosh
1070			Nike*
1071			Swoosh
1072			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 19): \$76,000,000 (76 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 20			
1073	Men	Basketball	Air Jordan*
1074			Jumpman
1075			Nike Air And Swoosh
1076			Nike*
1077		Lifestyle	Afl Sole
1078			Air Jordan*
1079			Dunk Low
1080			Dunk Sole
1081			Dunk*
1082			Jumpman
1083			Nike Air Slanted And Swoosh
1084			Nike Air*
1085			Nike And Swoosh
1086			Nike Vapor*
1087			Nike*
1088			Presto*

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
1089			Swoosh	
1090			Waffle*	
1091			Wings	
1092			Running	Airmax*
1093				Nike Air*
1094				Nike And Swoosh
1095				Nike*
1096				Swoosh
1097				Vapormax*
1098				Women
1099	Jumpman			
1100	Nike Air And Swoosh			
1101	Lifestyle	Air Jordan*		
1102		Dunk Low		
1103		Dunk Sole		
1104		Dunk*		
1105		Nike Air Slanted And Swoosh		
1106		Nike And Swoosh		
1107		Nike*		
1108	Swoosh			
1109	Wings			
1110	Youth	Lifestyle	Air Jordan*	
1111			Dunk Sole	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1112			Nike Air Slanted And Swoosh
1113			Nike And Swoosh
1114			Swoosh
1115			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 20): \$43,000,000 (43 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 21			
1116	Men	Basketball	Air Jordan*
1117			Elite*
1118			Jumpman
1119			Nike Air*
1120			Nike*
1121			Spiral
1122			Swoosh
1123			Converse
1124		Converse High Top	
1125		Converse Low Top	
1126		Converse Mid Sole	
1127		Converse Sole	
1128		Converse Toe	
1129		Converse*	
1130		Ct Signature	
1131		Star	
1132		Lifestyle	Afl High

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1133			Afl Mid
1134			Afl Sole
1135			Air Force 1*
1136			Air Jordan*
1137			Air270*
1138			Airmax*
1139			Am 95
1140			Dunk High
1141			Dunk Low
1142			Dunk Sole
1143			Dunk*
1144			Nike Air And Swoosh
1145			Nike Air Slanted And Swoosh
1146			Nike Air*
1147			Nike And Swoosh
1148			Nike Over Swoosh
1149			Nike Vapor*
1150			Nike*
1151			Swoosh
1152			Swoosh*
1153			Waffle*
1154			Wings
1155	Women	Basketball	Air Jordan*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1156			Jumpman
1157			Nike Air*
1158			Nike*
1159			Swoosh
1160		Lifestyle	Afl Low
1161			Afl Sole
1162			Air Jordan*
1163			Air270*
1164			Airmax*
1165			Dunk High
1166			Dunk Low
1167			Dunk Sole
1168			Dunk*
1169			Nike Air And Swoosh
1170			Nike Air Slanted And Swoosh
1171			Nike And Swoosh
1172			Nike*
1173			Swoosh
1174			Wings
1175	Youth	Basketball	Air Jordan*
1176			Jumpman
1177			Nike Air*
1178			Nike*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1179		Lifestyle	Afl Low
1180			Afl Mid
1181			Afl Sole
1182			Air Jordan*
1183			Air270*
1184			Airmax*
1185			Dunk High
1186			Dunk Low
1187			Dunk Sole
1188			Dunk*
1189			Jumpman
1190			Nike Air Slanted And Swoosh
1191			Nike Air*
1192			Nike And Swoosh
1193			Nike*
1194			Swoosh
1195			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 21): \$80,000,000 (80 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 22			
1196	Men	Basketball	Air Jordan*
1197			Jumpman
1198			Jumpman*
1199			Nike Air And Swoosh

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
1200		Lifestyle	Afl Low	
1201			Afl Sole	
1202			Air Jordan*	
1203			Airmax*	
1204			Cortez*	
1205			Dunk High	
1206			Dunk Low	
1207			Dunk Sole	
1208			Dunk*	
1209			Flyknit*	
1210			Nike Air And Swoosh	
1211			Nike Air Slanted And Swoosh	
1212			Nike Air*	
1213			Nike And Swoosh	
1214			Nike*	
1215			Swoosh	
1216			Vapormax*	
1217			Wings	
1218			Running	Nike Air*
1219				Nike And Swoosh
1220		Nike*		
1221		Swoosh		
1222		Vapormax*		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1223	Women	Basketball	Air Jordan*
1224			Jumpman
1225			Jumpman*
1226		Lifestyle	Air Jordan*
1227			Airmax*
1228			Dunk Low
1229			Dunk Sole
1230			Dunk*
1231			Nike Air And Swoosh
1232			Nike Air Slanted And Swoosh
1233			Nike Air*
1234			Nike And Swoosh
1235			Nike*
1236			Swoosh
1237			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 22): \$42,000,000 (42 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 23			
1238	Men	Basketball	Air Jordan*
1239			Jumpman
1240			Jumpman*
1241		Nike Air And Swoosh	
1242		Boots	Nike Air*
1243			Nike And Swoosh

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
1244			Nike*	
1245			Swoosh	
1246		Lifestyle	Afl Low	
1247			Afl Mid	
1248			Afl Sole	
1249			Air Force 1*	
1250			Air Jordan*	
1251			Airmax*	
1252			Dunk High	
1253			Dunk Low	
1254			Dunk Sole	
1255			Dunk*	
1256			Nike Air Slanted And Swoosh	
1257			Nike Air*	
1258			Nike And Swoosh	
1259			Nike Over Swoosh	
1260			Nike Vapor*	
1261			Nike*	
1262			Presto*	
1263			Swoosh	
1264			Waffle*	
1265			Wings	
1266			Running	Airmax*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1267			Flyknit*
1268			Nike Air*
1269			Nike*
1270			Swoosh
1271			Vapormax*
1272	Women	Basketball	Air Jordan*
1273			Jumpman
1274			Jumpman*
1275		Lifestyle	Afl Low
1276			Afl Sole
1277			Air Force 1*
1278			Air Jordan*
1279			Airmax*
1280			Dunk Low
1281			Dunk Sole
1282			Dunk*
1283			Nike Air And Swoosh
1284			Nike Air Slanted And Swoosh
1285			Nike Air*
1286			Nike And Swoosh
1287			Nike*
1288			Swoosh
1289			Wings

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1290	Youth	Basketball	Jumpman
1291		Lifestyle	Dunk Sole
1292			Jumpman
1293			Nike Air Slanted And Swoosh
1294			Nike And Swoosh
1295			Swoosh
1296			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 23): \$59,000,000 (59 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 24			
1297	Men	Basketball	Air Jordan*
1298			Jumpman
1299			Nike Air And Swoosh
1300			Nike And Swoosh
1301			Nike*
1302			Swoosh
1303			Lifestyle
1304		Af1 Sole	
1305		Air Jordan*	
1306		Airmax*	
1307		Dunk Low	
1308		Dunk Sole	
1309		Dunk*	
1310		Nike Air And Swoosh	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1311			Nike Air Slanted And Swoosh
1312			Nike Air*
1313			Nike And Swoosh
1314			Nike Over Swoosh
1315			Nike Vapor*
1316			Nike*
1317			Presto*
1318			Swoosh
1319			Waffle*
1320			Wings
1321	Women	Lifestyle	Air Jordan*
1322			Dunk Low
1323			Dunk Sole
1324			Dunk*
1325			Nike And Swoosh
1326			Nike Vapor*
1327			Nike*
1328			Swoosh
1329			Waffle*
TOTAL STATUTORY DAMAGES (Defendants Network 24): \$33,000,000 (33 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 25			
1330	Men	Basketball	Flyknit*
1331			Jumpman

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
1332			Nike Air And Swoosh	
1333			Nike And Swoosh	
1334			Nike*	
1335			Swoosh	
1336		Lifestyle	Afl Low	
1337			Afl Sole	
1338			Airmax*	
1339			Dunk Low	
1340			Dunk Sole	
1341			Dunk*	
1342			Jumpman	
1343			Nike Air And Swoosh	
1344			Nike Air Slanted And Swoosh	
1345			Nike Air*	
1346			Nike And Swoosh	
1347			Nike Over Swoosh	
1348			Nike*	
1349			Presto*	
1350			Swoosh	
1351			Waffle*	
1352			Wings	
1353			Youth	Basketball
1354		Converse		All Star

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
1355			Converse Ankle Design	
1356			Converse Circle	
1357			Converse Mid Sole	
1358			Converse W Star	
1359			Converse*	
1360			Ct Signature	
1361			Star	
1362			Lifestyle	Dunk Low
1363		Dunk Sole		
1364		Dunk*		
1365		Nike Air Slanted And Swoosh		
1366		Nike And Swoosh		
1367		Nike*		
1368		Swoosh		
TOTAL STATUTORY DAMAGES (Defendants Network 25): \$39,000,000 (39 Marks Per Types of Good Infringed x \$1,000,000)				
Defendants Network 26				
1369		Men	Basketball	Air Jordan*
1370				Jumpman
1371	Jumpman*			
1372	Lebron			
1373	Nike Air And Swoosh			
1374	Nike Air*			
1375	Nike*			

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1376			Swoosh
1377		Boots	Nike Air*
1378			Nike And Swoosh
1379			Nike*
1380			Swoosh
1381			Lifestyle
1382		Air Jordan*	
1383		Air270*	
1384		Airmax*	
1385		Cortez*	
1386		Dunk Sole	
1387		Dunk*	
1388		Jumpman	
1389		Just Do It*	
1390		Nike Air And Swoosh	
1391		Nike Air Slanted And Swoosh	
1392		Nike Air*	
1393		Nike And Swoosh	
1394		Nike Vapor*	
1395		Nike*	
1396		Swoosh	
1397		Swoosh*	
1398		Waffle*	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1399		Running	Wings
1400			Flyknit*
1401			Nike Air And Swoosh
1402			Nike Air*
1403			Nike Over Swoosh
1404			Nike Vapor*
1405			Nike*
1406			Swoosh
1407			Vapormax*
1408			Vomero*
1409			Women
1410	Jumpman*		
1411	Lifestyle	Air Jordan*	
1412		Dunk Low	
1413		Dunk Sole	
1414		Dunk*	
1415		Nike Air Slanted And Swoosh	
1416		Nike And Swoosh	
1417		Nike*	
1418		Swoosh	
1419		Wings	
1420	Youth	Basketball	Air Jordan*
1421			Jumpman

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1422			Nike*
1423			Swoosh
1424		Lifestyle	Afl Low
1425			Afl Sole
1426			Dunk Sole
1427			Dunk*
1428			Nike Air And Swoosh
1429			Nike Air*
1430			Nike And Swoosh
1431			Nike*
1432			Swoosh
TOTAL STATUTORY DAMAGES (Defendants Network 26): \$64,000,000 (64 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 27			
1433	Men	Basketball	Air Jordan*
1434			Durant
1435			Jumpman
1436			Jumpman*
1437			M
1438			Nike Air And Swoosh
1439			Nike And Swoosh
1440			Nike*
1441			Swoosh
1442			Boots

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
1443			Swoosh	
1444		Converse	All Star	
1445			Converse Ankle Design	
1446			Converse Circle	
1447			Converse High Top	
1448			Converse Low Top	
1449			Converse Mid Sole	
1450			Converse Sole	
1451			Converse Toe	
1452			Converse*	
1453			Ct Signature	
1454			Star	
1455			Star And Chevron	
1456			Lifestyle	Afl Mid
1457				Afl Sole
1458		Air Force 1*		
1459		Air Jordan*		
1460		Airmax*		
1461		Cortez*		
1462		Dunk High		
1463		Dunk Low		
1464		Dunk Sole		
1465		Dunk*		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1466			Jumpman
1467			Just Do It*
1468			Nike Air And Swoosh
1469			Nike Air Slanted And Swoosh
1470			Nike Air*
1471			Nike And Swoosh
1472			Nike Over Swoosh
1473			Nike Vapor*
1474			Nike*
1475			Presto*
1476			Swoosh
1477			Swoosh*
1478			Waffle*
1479			Wings
1480		Running	Airmax*
1481		Running	Flyknit*
1482		Running	Just Do It*
1483		Running	Nike Air*
1484		Running	Nike And Swoosh
1485		Running	Nike Over Swoosh
1486		Running	Nike*
1487		Running	Spiral
1488		Running	Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1489			Swoosh*
1490			Vapormax*
1491	Women	Basketball	Air Jordan*
1492			Jumpman
1493			Nike*
1494		Lifestyle	Afl Low
1495			Afl Mid
1496			Afl Sole
1497			Air Force 1*
1498			Air Jordan*
1499			Airmax*
1500			Dunk High
1501			Dunk Low
1502			Dunk Sole
1503			Dunk*
1504			Jumpman
1505			Nike Air And Swoosh
1506			Nike Air Slanted And Swoosh
1507			Nike Air*
1508			Nike And Swoosh
1509			Nike Over Swoosh
1510			Nike Vapor*
1511	Nike*		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1512			Presto*
1513			Spiral
1514			Swoosh
1515			Swoosh*
1516			Waffle*
1517			Wings
1518		Running	Flyknit*
1519			Nike Air*
1520			Nike*
1521			Spiral
1522			Swoosh
1523			Vapormax*
1524	Youth	Basketball	Air Jordan*
1525			Airmax*
1526			Jumpman
1527		Lifestyle	Air Force 1*
1528			Airmax*
1529			Jumpman
1530			Swoosh
1531			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 27): \$99,000,000 (99 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 28			
1532	Men	Basketball	Air Jordan*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1533			Jumpman
1534			Lebron
1535			Nike Air And Swoosh
1536			Nike And Swoosh
1537			Nike*
1538			Swoosh
1539			Swoosh*
1540		Boots	Nike Air*
1541			Nike And Swoosh
1542			Nike*
1543			Swoosh
1544		Converse	Converse Circle
1545			Converse High Top
1546			Converse Mid Sole
1547			Converse Sole
1548			Converse Toe
1549			Converse*
1550			Star
1551		Lifestyle	Afl High
1552			Afl Low
1553			Afl Mid
1554			Afl Sole
1555			Air Force 1*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1556			Air Jordan*
1557			Airmax*
1558			Dunk High
1559			Dunk Low
1560			Dunk Sole
1561			Dunk*
1562			Nike Air And Swoosh
1563			Nike Air*
1564			Nike And Swoosh
1565			Nike Over Swoosh
1566			Nike Vapor*
1567			Nike*
1568			Swoosh
1569			Waffle*
1570			Wings
1571		Running	Flyknit*
1572			Just Do It*
1573			Nike Air And Swoosh
1574			Nike Air*
1575			Nike And Swoosh
1576			Nike Over Swoosh
1577			Nike*
1578			Swoosh

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
1579			Vapormax*	
1580			Vomero*	
1581			Sandals	Nike And Swoosh
1582				Nike*
1583				Swoosh
1584	Women	Basketball	Air Jordan*	
1585			Jumpman	
1586			Nike Air And Swoosh	
1587			Nike Air*	
1588			Nike*	
1589			Swoosh	
1590		Boots	Nike Air*	
1591			Nike*	
1592			Swoosh	
1593		Lifestyle	Afl High	
1594			Afl Low	
1595			Afl Mid	
1596			Afl Sole	
1597			Air Force 1*	
1598			Air Jordan*	
1599			Airmax*	
1600			Dunk High	
1601			Dunk Low	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1602			Dunk Sole
1603			Dunk*
1604			Nike Air And Swoosh
1605			Nike Air*
1606			Nike And Swoosh
1607			Nike Over Swoosh
1608			Nike Vapor*
1609			Nike*
1610			Swoosh
1611			Waffle*
1612			Wings
1613		Running	Flyknit*
1614			Nike Air And Swoosh
1615			Nike Air*
1616			Nike And Swoosh
1617			Nike Over Swoosh
1618			Nike*
1619			Swoosh
1620			Vapormax*
1621			Vomero*
1622	Youth	Lifestyle	Afl Mid
1623			Afl Sole
1624			Air Force 1*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1625			Air Jordan*
1626			Dunk Sole
1627			Jumpman
1628			Nike And Swoosh
1629			Swoosh
1630			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 28): \$99,000,000 (99 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 29			
1631	Men	Basketball	Air Jordan*
1632			Jumpman
1633			Jumpman*
1634			Nike And Swoosh
1635			Swoosh
1636		Converse	All Star
1637			Converse
1638			Converse Ankle Design
1639			Converse Circle
1640			Converse High Top
1641			Converse Low Top
1642			Converse Mid Sole
1643			Converse Sole
1644			Converse Toe
1645			Converse W Star

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1646			Converse*
1647			Ct Signature
1648			Star
1649			Star And Chevron
1650		Lifestyle	Afl Low
1651		Lifestyle	Afl Mid
1652		Lifestyle	Afl Sole
1653		Lifestyle	Air Force 1*
1654		Lifestyle	Air Jordan*
1655		Lifestyle	Airmax*
1656		Lifestyle	Converse*
1657		Lifestyle	Dunk High
1658		Lifestyle	Dunk Low
1659		Lifestyle	Dunk Sole
1660		Lifestyle	Dunk*
1661		Lifestyle	Jumpman
1662		Lifestyle	Nike Air And Swoosh
1663		Lifestyle	Nike Air Slanted And Swoosh
1664		Lifestyle	Nike Air*
1665		Lifestyle	Nike And Swoosh
1666		Lifestyle	Nike Over Swoosh
1667		Lifestyle	Nike*
1668		Lifestyle	Presto*

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
1669			Swoosh	
1670			Swoosh*	
1671			Waffle*	
1672			Wings	
1673		Running	Air Jordan*	
1674			Flyknit*	
1675			Nike Air And Swoosh	
1676			Nike And Swoosh	
1677			Nike Over Swoosh	
1678			Swoosh	
1679			Vapormax*	
1680			Women	Basketball
1681		Lifestyle		Afl Low
1682	Afl Mid			
1683	Afl Sole			
1684	Air Force 1*			
1685	Air Jordan*			
1686	Airmax*			
1687	Coil			
1688	Dunk High			
1689	Dunk Sole			
1690	Dunk*			
1691	Nike Air And Swoosh			

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1692			Nike Air Slanted And Swoosh
1693			Nike And Swoosh
1694			Nike Over Swoosh
1695			Nike*
1696			Presto*
1697			Swoosh
1698			Waffle*
1699			Wings
1700			Running
1701		Flyknit*	
1702		Nike Air And Swoosh	
1703		Swoosh	
1704		Vapormax*	
1705		Youth	Basketball
1706	Jumpman		
1707	Lifestyle		Air Jordan*
1708			Dunk Sole
1709			Jumpman
1710			Nike And Swoosh
1711			Swoosh
1712			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 29): \$82,000,000 (82 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 30			

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1713	Men	Basketball	Air Jordan*
1714			Jumpman
1715			Jumpman*
1716			Nike And Swoosh
1717		Lifestyle	Afl Low
1718			Afl Mid
1719			Air Force 1*
1720			Air Jordan*
1721			Airmax*
1722			Dunk Low
1723			Dunk*
1724			Jumpman
1725			Just Do It*
1726			Nike Air And Swoosh
1727			Nike Air Slanted And Swoosh
1728			Nike Air*
1729			Nike And Swoosh
1730			Nike Over Swoosh
1731			Nike Vapor*
1732			Nike*
1733	Presto*		
1734	Swoosh		
1735	Waffle*		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1736			Wings
1737	Women	Basketball	Air Jordan*
1738			Nike Air And Swoosh
1739			Lifestyle
1740		Afl Mid	
1741		Air Force 1*	
1742		Air Jordan*	
1743		Airmax*	
1744		Dunk Low	
1745		Dunk*	
1746		Jumpman	
1747		Nike Air Slanted And Swoosh	
1748		Nike Air*	
1749		Nike And Swoosh	
1750		Nike Over Swoosh	
1751		Nike Vapor*	
1752		Nike*	
1753		Presto*	
1754		Swoosh	
1755		Swoosh*	
1756		Waffle*	
1757	Wings		
1758		Running	Nike Air*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1759			Nike And Swoosh
1760			Nike*
1761			Swoosh
1762			Swoosh*
1763			Vapormax*
TOTAL STATUTORY DAMAGES (Defendants Network 30): \$51,000,000 (51 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 31			
1764	Men	Basketball	Air Jordan*
1765			Jumpman
1766			Jumpman*
1767			Nike Air And Swoosh
1768			Nike Air*
1769			Nike And Swoosh
1770			Nike*
1771			Swoosh
1772			Boots
1773		Nike And Swoosh	
1774		Nike*	
1775		Swoosh	
1776		Lifestyle	Afl Low
1777			Afl Sole
1778			Air Force 1*
1779			Air Jordan*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1780			Airmax*
1781			Dunk High
1782			Dunk Low
1783			Dunk Sole
1784			Dunk*
1785			Flyknit*
1786			Nike Air And Swoosh
1787			Nike Air Slanted And Swoosh
1788			Nike Air*
1789			Nike And Swoosh
1790			Nike Over Swoosh
1791			Nike*
1792			Presto*
1793			Spiral
1794			Swoosh
1795			Wings
1796		Running	Airmax*
1797			Flyknit*
1798			Nike Air*
1799			Nike And Swoosh
1800			Nike*
1801			Spiral
1802			Swoosh

Network Damages By Category					
No.	Gender	Category	Mark Infringed		
1803			Vapormax*		
1804	Women	Basketball	Air Jordan*		
1805			Jumpman		
1806			Jumpman*		
1807		Lifestyle	Air Jordan*		
1808			Dunk Low		
1809			Dunk Sole		
1810			Dunk*		
1811			Nike Air Slanted And Swoosh		
1812			Nike And Swoosh		
1813			Nike*		
1814			Swoosh		
1815			Wings		
1816			Youth	Lifestyle	Air Jordan*
1817					Airmax*
1818	Dunk Sole				
1819	Jumpman				
1820	Nike Air*				
1821	Nike And Swoosh				
1822	Nike*				
1823	Swoosh				
1824	Swoosh*				
1825	Waffle*				

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1826			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 31): \$63,000,000 (63 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 32			
1827	Men	Basketball	Air Jordan*
1828			Jumpman
1829			Jumpman*
1830			Nike Air And Swoosh
1831			Nike Air*
1832			Nike And Swoosh
1833			Nike*
1834			Swoosh
1835			Jacket
1836		Jumpman*	
1837		Nike And Swoosh	
1838		Nike*	
1839		Jersey	Dri-Fit*
1840			Nike And Swoosh
1841			Spiral
1842			Swoosh
1843		Lifestyle	Afl Low
1844			Afl Mid
1845			Afl Sole
1846			Air Force 1*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1847			Air Jordan*
1848			Airmax*
1849			Cortez*
1850			Dunk High
1851			Dunk Low
1852			Dunk Sole
1853			Dunk*
1854			Nike Air And Swoosh
1855			Nike Air Slanted And Swoosh
1856			Nike Air*
1857			Nike And Swoosh
1858			Nike Over Swoosh
1859			Nike Vapor*
1860			Nike*
1861			Swoosh
1862			Waffle*
1863			Wings
1864		Shirt	Air Jordan*
1865			Jumpman
1866			Nike And Swoosh
1867			Swoosh
1868		Shorts	Lebron
1869			Nike And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1870		Sweatshirt	Swoosh
1871			Just Do It*
1872			Nike And Swoosh
1873			Nike*
1874			Swoosh
1875			Women
1876	Dunk Sole		
1877	Dunk*		
1878	Nike And Swoosh		
1879	Nike*		
1880	Swoosh		
1881	Youth	Basketball	Jumpman
1882			Nike*
1883		Lifestyle	Afl Low
1884			Afl Sole
1885			Air Force 1*
1886			Air Jordan*
1887			Airmax*
1888			Cortez*
1889			Dunk High
1890			Dunk Low
1891			Dunk Sole
1892			Dunk*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1893			Nike Air And Swoosh
1894			Nike Air Slanted And Swoosh
1895			Nike Air*
1896			Nike And Swoosh
1897			Nike Over Swoosh
1898			Nike*
1899			Swoosh
1900			Waffle*
1901			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 32): \$75,000,000 (75 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 33			
1902	Men	Basketball	Air Flight*
1903			Airmax*
1904			Durant
1905			Jumpman
1906			Jumpman*
1907			Lebron
1908			M
1909			Nike Air And Swoosh
1910			Nike*
1911			Swoosh
1912			Boots
1913		Nike And Swoosh	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1914			Nike Free*
1915			Nike*
1916			Swoosh
1917		Jersey	Swoosh
1918		Lifestyle	Afl High
1919		Lifestyle	Afl Low
1920		Lifestyle	Afl Mid
1921		Lifestyle	Afl Sole
1922		Lifestyle	Air270*
1923		Lifestyle	Cortez*
1924		Lifestyle	Dunk High
1925		Lifestyle	Dunk Low
1926		Lifestyle	Dunk Sole
1927		Lifestyle	Dunk*
1928		Lifestyle	Flyknit*
1929		Lifestyle	Nike Air And Swoosh
1930		Lifestyle	Nike Air Slanted And Swoosh
1931		Lifestyle	Nike And Swoosh
1932		Lifestyle	Nike*
1933		Lifestyle	Presto*
1934		Lifestyle	Swoosh
1935		Lifestyle	Waffle*
1936		Lifestyle	Wings

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
1937		Running	Acg	
1938			Flyknit*	
1939			Nike Free*	
1940			Spiral	
1941			Swoosh	
1942			Vomero*	
1943			Sandals	Swoosh
1944		Soccer	Elite*	
1945			Flyknit*	
1946			Mercurial*	
1947			Swoosh	
1948		Women	Basketball	Airmax*
1949				Jumpman
1950	M			
1951	Swoosh			
1952	Boots		Flyknit*	
1953			Nike Free*	
1954			Swoosh	
1955	Lifestyle		Afl High	
1956			Afl Low	
1957			Afl Mid	
1958			Afl Sole	
1959			Air270*	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
1960			Cortez*
1961			Dunk High
1962			Dunk Low
1963			Dunk Sole
1964			Dunk*
1965			Flyknit*
1966			Jumpman
1967			Nike Air And Swoosh
1968			Nike Air Slanted And Swoosh
1969			Nike And Swoosh
1970			Nike*
1971			Swoosh
1972			Waffle*
1973			Wings
1974		Running	Acg
1975			Flyknit*
1976			Nike*
1977			Spiral
1978			Swoosh
1979			Vomero*
1980		Sandals	Swoosh
1981		Soccer	Elite*
1982			Mercurial*

Network Damages By Category					
No.	Gender	Category	Mark Infringed		
1983			Swoosh		
1984	Youth	Lifestyle	Dunk Low		
1985			Dunk Sole		
1986			Dunk*		
1987			Nike Air Slanted And Swoosh		
1988			Nike And Swoosh		
1989			Swoosh		
1990			Waffle*		
1991			Wings		
TOTAL STATUTORY DAMAGES (Defendants Network 33): \$90,000,000 (90 Marks Per Types of Good Infringed x \$1,000,000)					
Defendants Network 34					
1992	Men	Basketball	Air Jordan*		
1993			Durant		
1994			Jumpman		
1995			Jumpman*		
1996			Lebron		
1997			Nike Air And Swoosh		
1998			Nike Air*		
1999			Nike And Swoosh		
2000			Nike*		
2001			Swoosh		
2002			Wings		
2003				Boots	Acg

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2004			Nike Air*
2005			Nike And Swoosh
2006			Nike*
2007			Swoosh
2008		Lifestyle	Afl Low
2009			Afl Mid
2010			Afl Sole
2011			Air Force 1*
2012			Air Jordan*
2013			Cortez*
2014			Dunk High
2015			Dunk Low
2016			Dunk Sole
2017			Dunk*
2018			Nike Air Slanted And Swoosh
2019			Nike Air*
2020			Nike And Swoosh
2021			Nike Over Swoosh
2022			Nike Vapor*
2023			Nike*
2024			Presto*
2025			Spiral
2026			Swoosh

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
2027			Waffle*	
2028			Wings	
2029			Running	Acg
2030				Just Do It*
2031				Nike Air*
2032				Nike And Swoosh
2033				Nike Over Swoosh
2034				Nike Vapor*
2035				Nike*
2036				Swoosh
2037				Swoosh*
2038				Vapormax*
2039			Women	Basketball
2040	Jumpman			
2041	Jumpman*			
2042	Nike Air*			
2043	Nike*			
2044	Swoosh			
2045	Boots	Acg		
2046		Nike Air*		
2047		Nike And Swoosh		
2048		Nike*		
2049		Swoosh		

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
2050		Lifestyle	Afl Low	
2051			Afl Sole	
2052			Air Force 1*	
2053			Air Jordan*	
2054			Cortez*	
2055			Dunk High	
2056			Dunk Low	
2057			Dunk Sole	
2058			Dunk*	
2059			Nike Air Slanted And Swoosh	
2060			Nike Air*	
2061			Nike And Swoosh	
2062			Nike Vapor*	
2063			Nike*	
2064			Presto*	
2065			Spiral	
2066			Swoosh	
2067			Waffle*	
2068			Running	Acg
2069				Flyknit*
2070		Nike Air*		
2071		Nike Over Swoosh		
2072		Nike Vapor*		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2073			Nike*
2074			Spiral
2075			Swoosh
2076			Vapormax*
2077	Youth	Lifestyle	Dunk*
2078			Nike*
TOTAL STATUTORY DAMAGES (Defendants Network 34): \$87,000,000 (87 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 35			
2079	Men	Basketball	Air Jordan*
2080			Jumpman
2081			Jumpman*
2082			Nike Air And Swoosh
2083			Nike And Swoosh
2084			Nike*
2085		Boots	Nike Air*
2086			Nike And Swoosh
2087			Nike*
2088			Swoosh
2089		Converse	Converse Low Top
2090			Converse Mid Sole
2091			Converse Toe
2092			Converse*
2093			Lifestyle

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2094			Afl Sole
2095			Air Force 1*
2096			Air Jordan*
2097			Airmax*
2098			Dunk High
2099			Dunk Low
2100			Dunk Sole
2101			Dunk*
2102			Nike Air And Swoosh
2103			Nike Air Slanted And Swoosh
2104			Nike Air*
2105			Nike And Swoosh
2106			Nike Over Swoosh
2107			Nike Vapor*
2108			Nike*
2109			Presto*
2110			Swoosh
2111			Waffle*
2112			Wings
2113		Running	Airmax*
2114			Flyknit*
2115			Nike Air*
2116			Nike*

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
2117			Swoosh	
2118			Vapormax*	
2119	Women	Basketball	Air Jordan*	
2120			Jumpman	
2121			Jumpman*	
2122			Nike Air And Swoosh	
2123			Nike And Swoosh	
2124			Nike*	
2125			Lifestyle	Air Jordan*
2126				Dunk Low
2127		Dunk Sole		
2128		Dunk*		
2129		Nike Air Slanted And Swoosh		
2130		Nike And Swoosh		
2131		Nike*		
2132		Swoosh		
2133		Wings		
2134		Youth		Basketball
2135			Jumpman	
2136			Nike*	
2137	Swoosh			
2138	Lifestyle		Air Jordan*	
2139			Dunk Low	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2140			Dunk Sole
2141			Dunk*
2142			Nike Air Slanted And Swoosh
2143			Nike And Swoosh
2144			Nike*
2145			Swoosh
2146			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 35): \$68,000,000 (68 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 36			
2147	Men	Basketball	Air Jordan*
2148			Durant
2149			Jumpman
2150			M
2151			Nike Air And Swoosh
2152			Nike And Swoosh
2153			Nike*
2154			Swoosh
2155		Lifestyle	Afl Low
2156			Afl Sole
2157			Air Force 1*
2158			Air Jordan*
2159			Airmax*
2160			Cortez*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2161			Dunk High
2162			Dunk Low
2163			Dunk Sole
2164			Dunk*
2165			Jumpman
2166			Nike Air And Swoosh
2167			Nike Air Slanted And Swoosh
2168			Nike Air*
2169			Nike And Swoosh
2170			Nike Over Swoosh
2171			Nike*
2172			Presto*
2173			Spiral
2174			Swoosh
2175			Swoosh*
2176			Waffle*
2177			Wings
2178		Running	Airmax*
2179			Flyknit*
2180			Nike Air*
2181			Nike*
2182			Vapormax*
2183	Women	Basketball	Air Jordan*

Network Damages By Category					
No.	Gender	Category	Mark Infringed		
2184			Jumpman		
2185			Nike Air And Swoosh		
2186			Nike And Swoosh		
2187		Lifestyle	Afl Low		
2188			Afl Sole		
2189			Air Force 1*		
2190			Air Jordan*		
2191			Dunk Low		
2192			Dunk Sole		
2193			Dunk*		
2194			Jumpman		
2195			Nike Air Slanted And Swoosh		
2196			Nike Air*		
2197			Nike And Swoosh		
2198			Nike*		
2199			Swoosh		
2200			Wings		
2201			Youth	Basketball	Air Jordan*
2202					Nike Air And Swoosh
2203					Nike And Swoosh
2204	Lifestyle	Air Jordan*			
TOTAL STATUTORY DAMAGES (Defendants Network 36): \$58,000,000 (58 Marks Per Types of Good Infringed x \$1,000,000)					
Defendants Network 37					

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
2205	Men	Basketball	Air Jordan*	
2206			Jumpman	
2207			Jumpman*	
2208			Nike Air And Swoosh	
2209			Nike Air*	
2210			Nike*	
2211			Lifestyle	Afl Low
2212				Afl Sole
2213				Air Jordan*
2214				Air270*
2215	Airmax*			
2216	Am 95			
2217	Dunk High			
2218	Dunk Low			
2219	Dunk Sole			
2220	Dunk*			
2221	Flyknit*			
2222	Just Do It*			
2223	Nike Air And Swoosh			
2224	Nike Air Slanted And Swoosh			
2225	Nike Air*			
2226	Nike And Swoosh			
2227	Nike*			

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
2228			Presto*	
2229			Swoosh	
2230			Wings	
2231			Running	Air Jordan*
2232				Flyknit*
2233				Nike Air*
2234				Nike Vapor*
2235				Nike*
2236				Swoosh
2237				Vapormax*
2238				Women
2239	Jumpman			
2240	Nike Air*			
2241	Nike*			
2242	Lifestyle	Afl Low		
2243		Afl Mid		
2244		Afl Sole		
2245		Air Jordan*		
2246		Air270*		
2247		Airmax*		
2248		Am 95		
2249		Dunk Low		
2250		Dunk Sole		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2251			Dunk*
2252			Jumpman
2253			Nike Air And Swoosh
2254			Nike Air*
2255			Nike And Swoosh
2256			Nike*
2257			Swoosh
2258			Wings
2259		Running	Air Jordan*
2260			Flyknit*
2261			Nike Air*
2262			Nike*
2263			Swoosh
2264			Vapormax*
TOTAL STATUTORY DAMAGES (Defendants Network 37): \$60,000,000 (60 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 38			
2265	Men	Basketball	Air Jordan*
2266			Flyknit*
2267			Jumpman
2268			Jumpman*
2269			Nike Air And Swoosh
2270			Nike And Swoosh
2271			Nike*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2272			Swoosh
2273			Wings
2274		Boots	Nike And Swoosh
2275			Swoosh
2276		Lifestyle	Afl Low
2277			Afl Mid
2278			Afl Sole
2279			Air Force 1*
2280			Dunk High
2281			Dunk Low
2282			Dunk Sole
2283			Dunk*
2284			Nike Air Slanted And Swoosh
2285			Nike And Swoosh
2286			Nike Over Swoosh
2287			Nike*
2288			Presto*
2289			Swoosh
2290			Wings
2291		Running	Nike Air And Swoosh
2292			Nike And Swoosh
2293			Nike Over Swoosh
2294			Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2295			Vapormax*
2296	Women	Basketball	Jumpman
2297			Nike And Swoosh
2298			Lifestyle
2299		Afl Mid	
2300		Afl Sole	
2301		Air Force 1*	
2302		Airmax*	
2303		Dunk High	
2304		Dunk Low	
2305		Dunk Sole	
2306		Dunk*	
2307		Just Do It*	
2308		Nike Air And Swoosh	
2309		Nike Air Slanted And Swoosh	
2310		Nike And Swoosh	
2311		Nike*	
2312		Swoosh	
2313		Waffle*	
2314		Wings	
2315	Just Do It*		
2316	Mercurial*		
2317	Nike And Swoosh		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2318			Nike*
2319			Swoosh
2320			Vapormax*
TOTAL STATUTORY DAMAGES (Defendants Network 38): \$56,000,000 (56 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 39			
2321	Men	Basketball	Air Jordan*
2322			Jumpman
2323			Jumpman*
2324			Nike Air And Swoosh
2325			Nike And Swoosh
2326		Lifestyle	Afl High
2327			Afl Low
2328			Afl Mid
2329			Afl Sole
2330			Air Jordan*
2331			Air270*
2332			Airmax*
2333			Cortez*
2334			Dunk High
2335			Dunk Low
2336			Dunk Sole
2337			Dunk*
2338			Flyknit*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2339			Nike Air And Swoosh
2340			Nike Air Slanted And Swoosh
2341			Nike Air*
2342			Nike And Swoosh
2343			Nike Over Swoosh
2344			Nike Vapor*
2345			Nike*
2346			Spiral
2347			Swoosh
2348			Vapormax*
2349			Waffle*
2350			Wings
2351		Running	Airmax*
2352			Nike Air*
2353			Nike And Swoosh
2354			Nike*
2355			Spiral
2356			Swoosh
2357			Vapormax*
2358		Soccer	Elite*
2359			Flyknit*
2360			Mercurial*
2361			Nike*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2362			Swoosh
2363			Tiempo*
2364	Women	Basketball	Air Jordan*
2365			Jumpman
2366			Nike And Swoosh
2367		Lifestyle	Afl High
2368			Afl Low
2369			Afl Mid
2370			Afl Sole
2371			Air270*
2372			Airmax*
2373			Dunk High
2374			Dunk Low
2375			Dunk Sole
2376			Dunk*
2377			Nike Air And Swoosh
2378			Nike Air Slanted And Swoosh
2379			Nike Air*
2380			Nike And Swoosh
2381			Nike Over Swoosh
2382			Nike*
2383			Swoosh
2384	Wings		

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
2385		Running	Nike Air*	
2386			Nike*	
2387		Soccer	Elite*	
2388			Mercurial*	
2389			Nike*	
2390			Tiempo*	
2391			Youth	Basketball
2392		Lifestyle		Airmax*
2393				Dunk Low
2394				Dunk*
2395	Jumpman			
2396	Nike And Swoosh			
2397	Nike*			
2398	Swoosh			
2399	Wings			
TOTAL STATUTORY DAMAGES (Defendants Network 39): \$79,000,000 (79 Marks Per Types of Good Infringed x \$1,000,000)				
Defendants Network 40				
2400	Men	Basketball	Air Jordan*	
2401			Jumpman	
2402			Jumpman*	
2403			Lebron	
2404			Nike Air And Swoosh	
2405			Nike And Swoosh	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2406			Nike*
2407			Swoosh
2408			Wings
2409		Boots	Nike Air*
2410			Nike*
2411			Swoosh
2412		Converse	All Star
2413			Converse
2414			Converse Ankle Design
2415			Converse Circle
2416			Converse High Top
2417			Converse Mid Sole
2418			Converse Sole
2419			Converse Toe
2420			Ct Signature
2421			Star
2422			Jacket
2423		Jumpman	
2424		Nike And Swoosh	
2425		Nike*	
2426		Swoosh*	
2427		Jersey	Dri-Fit*
2428			Nike And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2429			Nike*
2430			Spiral
2431		Lifestyle	Afl Low
2432			Afl Mid
2433			Afl Sole
2434			Air Jordan*
2435			Airmax*
2436			Dunk High
2437			Dunk Low
2438			Dunk Sole
2439			Dunk*
2440			Jumpman
2441			Nike Air Slanted And Swoosh
2442			Nike Air*
2443			Nike And Swoosh
2444			Nike Over Swoosh
2445			Nike*
2446			Presto*
2447			Swoosh
2448			Waffle*
2449			Wings
2450			Pants
2451		Swoosh	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2452		Running	Flyknit*
2453			Nike Over Swoosh
2454			Nike*
2455			Swoosh
2456			Vomero*
2457			Shirt
2458		Nike*	
2459		Swoosh	
2460		Shorts	Nike And Swoosh
2461			Nike*
2462			Swoosh
2463		Sweatshirt	Nike And Swoosh
2464			Nike*
2465			Swoosh
2466		Women	Basketball
2467	Jumpman		
2468	Jumpman*		
2469	Lifestyle		Air Jordan*
2470			Dunk Low
2471			Dunk Sole
2472			Dunk*
2473			Jumpman
2474			Nike Air Slanted And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2475			Nike And Swoosh
2476			Nike*
2477			Swoosh
2478			Vapormax*
2479			Wings
2480		Running	Nike Air And Swoosh
2481			Nike Over Swoosh
2482			Nike*
2483			Swoosh
2484			Vomero*
TOTAL STATUTORY DAMAGES (Defendants Network 40): \$85,000,000 (85 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 41			
2485	Men	Basketball	Air Jordan*
2486			Jumpman
2487			Nike Air And Swoosh
2488			Nike*
2489		Lifestyle	Afl Low
2490			Afl Sole
2491			Air Jordan*
2492			Airmax*
2493			Dunk High
2494			Dunk Low
2495			Dunk Sole

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2496			Dunk*
2497			Nike Air Slanted And Swoosh
2498			Nike Air*
2499			Nike And Swoosh
2500			Nike Over Swoosh
2501			Nike Vapor*
2502			Nike*
2503			Swoosh
2504			Swoosh*
2505			Waffle*
2506			Wings
2507	Women	Basketball	Air Jordan*
2508			Jumpman
2509			Nike Air And Swoosh
2510			Nike*
2511		Lifestyle	Afl Low
2512			Afl Sole
2513			Air Jordan*
2514			Dunk Low
2515			Dunk Sole
2516			Dunk*
2517			Just Do It*
2518			Nike Air And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2519			Nike Air Slanted And Swoosh
2520			Nike Air*
2521			Nike And Swoosh
2522			Nike*
2523			Swoosh
2524			Wings
2525	Youth	Lifestyle	Air Jordan*
2526			Jumpman
2527			Nike Air Slanted And Swoosh
2528			Nike*
2529			Swoosh
2530			Swoosh*
2531			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 41): \$47,000,000 (47 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 42			
2532	Men	Basketball	Air Jordan*
2533			Jumpman
2534			Jumpman*
2535			Nike*
2536			Wings
2537		Boots	Acg
2538			Air Jordan*
2539			Nike Air*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2540			Nike*
2541			Swoosh
2542		Lifestyle	Afl Low
2543			Afl Mid
2544			Afl Sole
2545			Air Jordan*
2546			Air270*
2547			Airmax*
2548			Am 95
2549			Cortez*
2550			Dunk High
2551			Dunk Low
2552			Dunk Sole
2553			Dunk*
2554			Nike Air And Swoosh
2555			Nike Air Slanted And Swoosh
2556			Nike Air*
2557			Nike And Swoosh
2558			Nike Over Swoosh
2559			Nike Vapor*
2560			Nike*
2561			Swoosh
2562		Waffle*	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2563		Running	Wings
2564			Air Jordan*
2565			Nike*
2566			Vomero*
2567	Women	Basketball	Air Jordan*
2568			Jumpman
2569			Jumpman*
2570			Lebron
2571			Nike*
2572			Swoosh
2573			Boots
2574		Nike Air*	
2575		Nike And Swoosh	
2576		Nike*	
2577		Swoosh	
2578		Lifestyle	Afl High
2579			Afl Low
2580			Afl Sole
2581			Air Jordan*
2582			Air270*
2583			Airmax*
2584			Cortez*
2585			Dunk High

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
2586			Dunk Low	
2587			Dunk Sole	
2588			Dunk*	
2589			Nike Air And Swoosh	
2590			Nike Air*	
2591			Nike And Swoosh	
2592			Nike Over Swoosh	
2593			Nike Vapor*	
2594			Nike*	
2595			Swoosh	
2596			Waffle*	
2597			Running	Air Jordan*
2598				Nike*
2599				Vomero*
2600	Youth	Lifestyle	Air Jordan*	
2601			Dunk Low	
2602			Dunk Sole	
2603			Dunk*	
2604			Nike And Swoosh	
2605			Nike*	
2606			Swoosh	
TOTAL STATUTORY DAMAGES (Defendants Network 42): \$75,000,000 (75 Marks Per Types of Good Infringed x \$1,000,000)				
Defendants Network 43				

Network Damages By Category				
No.	Gender	Category	Mark Infringed	
2607	Men	Basketball	Air Flight*	
2608			Air Jordan*	
2609			Jumpman	
2610			Jumpman*	
2611			Lebron	
2612			Nike Air And Swoosh	
2613			Nike Air*	
2614			Nike And Swoosh	
2615			Nike*	
2616			Swoosh	
2617			Wings	
2618			Lifestyle	Afl Low
2619				Afl Mid
2620		Afl Sole		
2621		Air Force 1*		
2622		Air Jordan*		
2623		Dunk High		
2624		Dunk Low		
2625		Dunk Sole		
2626		Dunk*		
2627	Flyknit*			
2628	Jumpman			
2629	Nike Air And Swoosh			

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2630			Nike Air Slanted And Swoosh
2631			Nike Air*
2632			Nike And Swoosh
2633			Nike*
2634			Presto*
2635			Spiral
2636			Swoosh
2637			Vapormax*
2638			Waffle*
2639			Wings
2640	Women	Basketball	Air Jordan*
2641			Nike Air*
2642			Nike*
2643			Swoosh
2644		Lifestyle	Air Jordan*
2645			Dunk Sole
2646			Nike Air Slanted And Swoosh
2647			Nike And Swoosh
2648			Swoosh
2649			Wings
2650	Youth	Basketball	Air Flight*
2651			Air Jordan*
2652			Nike Air And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2653			Nike Air*
2654			Nike And Swoosh
2655			Nike*
2656			Swoosh
2657		Lifestyle	Flyknit*
2658			Nike Air*
2659			Nike*
2660			Swoosh
2661			Vapormax*
TOTAL STATUTORY DAMAGES (Defendants Network 43): \$55,000,000 (55 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 44			
2662	Men	Basketball	Air Jordan*
2663			Airmax*
2664			Jumpman
2665			Jumpman*
2666			Nike Air And Swoosh
2667			Nike Air*
2668			Nike And Swoosh
2669			Nike*
2670			Boots
2671		Air Force 1*	
2672		Airmax*	
2673		Dunk*	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2674			Nike Air Slanted And Swoosh
2675			Nike Air*
2676			Nike And Swoosh
2677			Nike*
2678			Swoosh
2679		Converse	Airmax*
2680			All Star
2681			Converse Ankle Design
2682			Converse By Star
2683			Converse Circle
2684			Converse High Top
2685			Converse Mid Sole
2686			Converse Toe
2687			Converse*
2688			Ct Signature
2689			Nike Air*
2690			Nike*
2691			Star
2692		Lifestyle	Afl Low
2693			Afl Sole
2694			Air Force 1*
2695			Air Jordan*
2696			Airmax*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2697			Dunk High
2698			Dunk Low
2699			Dunk Sole
2700			Dunk*
2701			Nike Air Slanted And Swoosh
2702			Nike Air*
2703			Nike And Swoosh
2704			Nike Over Swoosh
2705			Nike Vapor*
2706			Nike*
2707			Presto*
2708			Swoosh
2709			Swoosh*
2710			Vapormax*
2711			Waffle*
2712			Wings
2713		Running	Airmax*
2714			Nike Air And Swoosh
2715			Nike Air*
2716			Nike Over Swoosh
2717			Nike*
2718			Swoosh
2719	Women	Basketball	Air Jordan*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2720			Airmax*
2721			Jumpman
2722			Nike Air*
2723			Nike*
2724			Swoosh
2725		Lifestyle	Air Jordan*
2726			Airmax*
2727			Dunk Sole
2728			Dunk*
2729			Nike Air Slanted And Swoosh
2730			Nike Air*
2731			Nike And Swoosh
2732			Nike*
2733			Swoosh
2734			Wings
2735		Running	Airmax*
2736			Just Do It*
2737			Nike Air*
2738			Nike And Swoosh
2739			Nike*
2740			Swoosh
2741			Vapormax*
2742	Youth	Basketball	Air Jordan*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2743			Airmax*
2744			Jumpman
2745			Jumpman*
2746			Nike Air*
2747			Nike*
2748		Lifestyle	Afl Low
2749			Air Force 1*
2750			Airmax*
2751			Dunk Low
2752			Dunk Sole
2753			Dunk*
2754			Nike Air*
2755			Nike And Swoosh
2756			Nike Over Swoosh
2757			Nike Vapor*
2758			Nike*
2759			Swoosh
2760			Waffle*
TOTAL STATUTORY DAMAGES (Defendants Network 44): \$99,000,000 (99 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 45			
2761	Men	Basketball	Air Jordan*
2762			Jumpman
2763			Nike Air And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2764			Nike Air*
2765			Nike And Swoosh
2766			Nike*
2767			Swoosh
2768		Lifestyle	Af1 Low
2769			Af1 Sole
2770			Air Force 1*
2771			Airmax*
2772			Dunk Low
2773			Dunk Sole
2774			Dunk*
2775			Nike Air And Swoosh
2776			Nike Air*
2777			Nike And Swoosh
2778			Nike Over Swoosh
2779			Nike*
2780			Presto*
2781			Swoosh
2782	Women	Basketball	Air Jordan*
2783			Jumpman
2784		Lifestyle	Dunk Low
2785			Dunk Sole
2786			Dunk*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2787			Nike Air Slanted And Swoosh
2788			Nike And Swoosh
2789			Nike*
2790			Swoosh
2791			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 45): \$31,000,000 (31 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 46			
2792	Men	Basketball	Air Jordan*
2793			Jumpman
2794			Jumpman*
2795			Nike Air And Swoosh
2796			Nike And Swoosh
2797		Boots	Nike Air*
2798			Nike And Swoosh
2799			Nike*
2800			Swoosh
2801		Lifestyle	Afl Low
2802			Afl Sole
2803			Air Force 1*
2804			Airmax*
2805			Cortez*
2806			Dunk Low
2807			Dunk Sole

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2808			Dunk*
2809			Nike Air And Swoosh
2810			Nike Air Slanted And Swoosh
2811			Nike Air*
2812			Nike And Swoosh
2813			Nike Over Swoosh
2814			Nike Vapor*
2815			Nike*
2816			Presto*
2817			Swoosh
2818			Waffle*
2819			Wings
2820		Running	Nike And Swoosh
2821			Nike*
2822			Swoosh
2823			Vomero*
2824	Youth	Lifestyle	Afl Low
2825			Afl Sole
2826			Air Force 1*
2827			Dunk Low
2828			Dunk Sole
2829			Dunk*
2830			Nike Air And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2831			Nike Air*
2832			Nike And Swoosh
2833			Nike Over Swoosh
2834			Nike*
2835			Swoosh
TOTAL STATUTORY DAMAGES (Defendants Network 46): \$44,000,000 (44 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 47			
2836	Men	Basketball	Air Jordan*
2837			Jumpman
2838			Nike Air And Swoosh
2839			Nike And Swoosh
2840			Lifestyle
2841		Afl Sole	
2842		Air Force 1*	
2843		Air Jordan*	
2844		Airmax*	
2845		Dunk Low	
2846		Dunk Sole	
2847		Dunk*	
2848		Nike Air And Swoosh	
2849		Nike Air Slanted And Swoosh	
2850		Nike Air*	
2851		Nike And Swoosh	

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2852			Nike*
2853			Presto*
2854			Swoosh
2855			Waffle*
2856			Wings
2857			Shorts
2858		Swoosh	
TOTAL STATUTORY DAMAGES (Defendants Network 47): \$23,000,000 (23 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 48			
2859	Men	Basketball	Air Jordan*
2860			Jumpman
2861			Jumpman*
2862			Nike Air And Swoosh
2863			Nike And Swoosh
2864			Boots
2865		Nike And Swoosh	
2866		Swoosh	
2867		Lifestyle	Afl Low
2868			Afl Sole
2869			Air Force 1*
2870			Air Jordan*
2871			Airmax*
2872			Cortez*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2873			Dunk High
2874			Dunk Low
2875			Dunk Sole
2876			Dunk*
2877			Flyknit*
2878			Nike Air And Swoosh
2879			Nike Air Slanted And Swoosh
2880			Nike And Swoosh
2881			Nike Over Swoosh
2882			Nike*
2883			Swoosh
2884			Vapormax*
2885			Wings
2886	Women	Basketball	Air Jordan*
2887			Jumpman
2888			Jumpman*
2889		Lifestyle	Air Jordan*
2890			Airmax*
2891			Dunk Low
2892			Dunk Sole
2893			Dunk*
2894			Flyknit*
2895			Nike Air Slanted And Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2896			Nike And Swoosh
2897			Nike*
2898			Swoosh
2899			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 48): \$41,000,000 (41 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 49			
2900	Men	Basketball	Air Jordan*
2901			Durant
2902			Flyknit*
2903			Jumpman
2904			Nike Air And Swoosh
2905			Nike Air*
2906			Nike*
2907			Swoosh
2908			Wings
2909			Lifestyle
2910		Afl Low	
2911		Afl Mid	
2912		Afl Sole	
2913		Air Force 1*	
2914		Air Jordan*	
2915		Air270*	
2916	Airmax*		

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2917			Dunk High
2918			Dunk Sole
2919			Dunk*
2920			Just Do It*
2921			Nike Air And Swoosh
2922			Nike Air Slanted And Swoosh
2923			Nike Air*
2924			Nike And Swoosh
2925			Nike Over Swoosh
2926			Nike Vapor*
2927			Nike*
2928			Presto*
2929			Spiral
2930			Swoosh
2931			Swoosh*
2932			Waffle*
2933			Wings
2934		Running	Flyknit*
2935			Just Do It*
2936			Nike Air*
2937			Nike And Swoosh
2938			Nike Free*
2939			Nike Over Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2940			Nike*
2941			Swoosh
2942			Vapormax*
2943	Women	Basketball	Air Jordan*
2944			Jumpman
2945			Swoosh
2946		Lifestyle	Afl Low
2947			Afl Sole
2948			Air Force 1*
2949			Air Jordan*
2950			Dunk Sole
2951			Jumpman
2952			Nike Air Slanted And Swoosh
2953			Nike Air*
2954			Nike And Swoosh
2955			Nike*
2956			Swoosh
2957			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 49): \$58,000,000 (58 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 50			
2958	Men	Lifestyle	Nike Air Slanted And Swoosh
2959			Nike And Swoosh
2960			Swoosh

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2961			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 50): \$4,000,000 (4 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 51			
2962	Men	Basketball	Air Jordan*
2963			Jumpman
2964			Jumpman*
2965			Nike Air And Swoosh
2966			Nike And Swoosh
2967			Converse
2968		Converse Ankle Design	
2969		Converse Circle	
2970		Converse High Top	
2971		Converse Mid Sole	
2972		Converse Sole	
2973		Converse Toe	
2974		Star	
2975		Lifestyle	Afl Low
2976			Afl Sole
2977			Air Force 1*
2978			Airmax*
2979			Dunk High
2980			Dunk Low
2981			Dunk Sole

Network Damages By Category			
No.	Gender	Category	Mark Infringed
2982			Dunk*
2983			Nike Air And Swoosh
2984			Nike Air Slanted And Swoosh
2985			Nike Air*
2986			Nike And Swoosh
2987			Nike Over Swoosh
2988			Nike*
2989			Swoosh
2990			Swoosh*
2991			Vapormax*
2992			Wings
2993	Women	Basketball	Air Jordan*
2994			Jumpman
2995			Jumpman*
2996			Nike Air And Swoosh
2997			Nike And Swoosh
2998		Lifestyle	Afl Low
2999			Afl Sole
3000			Airmax*
3001			Dunk High
3002			Dunk Low
3003			Dunk Sole
3004			Dunk*

Network Damages By Category			
No.	Gender	Category	Mark Infringed
3005			Jumpman
3006			Nike Air And Swoosh
3007			Nike Air Slanted And Swoosh
3008			Nike Air*
3009			Nike And Swoosh
3010			Nike Over Swoosh
3011			Nike*
3012			Swoosh
3013			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 51): \$52,000,000 (52 Marks Per Types of Good Infringed x \$1,000,000)			
Defendants Network 52			
3014	Men	Lifestyle	Dunk Low
3015			Jumpman
3016			Nike Air Slanted And Swoosh
3017			Nike And Swoosh
3018			Swoosh
3019			Wings
TOTAL STATUTORY DAMAGES (Defendants Network 52): \$6,000,000 (6 Marks Per Types of Good Infringed x \$1,000,000)			

EXHIBIT 7

Infringing Websites by Domain Name	
No.	Infringing Website
.cc	
1.	bomblines.cc
2.	hotkicks.cc
3.	kickscentral.cc
4.	kickwho.cc
5.	monicasneaker.cc
6.	pkstockx.cc
7.	rimisneaker.cc
.cn	
8.	flightkickz.cn
.co	
9.	dopesneaker.co
10.	hypeshoes.co
11.	jdfoot.co
12.	mangomeee.co
13.	Xylar.co
.com	
14.	bagsmalles.com
15.	bstsneaker.com
16.	bstsneakers.com
17.	carlsneaker.com
18.	clothswmall.com
19.	clubkickz.com

Infringing Websites by Domain Name	
No.	Infringing Website
20.	cnfashionclub.com
21.	cocoshoesvip.com
22.	coolkicksmall.com
23.	dmsneaker.com
24.	ebuysneakers.com
25.	flightkickz.com
26.	hypeboosts.com
27.	hypeunique.com
28.	kicksgate.com
29.	kickzluucas.com
30.	lkkiks.com
31.	ln5factory.com
32.	mlsneakers.com
33.	mangomeee.com
34.	solenlaces.com
35.	songsneaker.com
36.	stockxkicks.com
37.	stockxpro.com
38.	stockxprovip.com
39.	stockxshoes.com
40.	stockxshoesvip.com
41.	stylesneaks.com
42.	taosneakers.com

Infringing Websites by Domain Name	
No.	Infringing Website
43.	timsneakers.com
44.	uabatman.com
45.	ubuysneakers.com
46.	wawone.com
47.	yzynation.com
.fun	
48.	rsneakers.fun
.is	
49.	hypeunique.is
.la	
50.	bomblin.la
.me	
51.	buykicks.me
52.	hypeunique.me
53.	kickscentral.me
.net	
54.	bmlin.net
55.	cocoshoes.net
56.	coptop.net
57.	crewkick.net
58.	ddkicks.net
.org	
59.	crewkicks.org

Infringing Websites by Domain Name	
No.	Infringing Website
60.	dunkskicks.org
61.	hotkicks.org
62.	jordankicks.org
63.	popkicks.org
64.	popshoe.org
.ru	
65.	888kicks.ru
66.	coptop.ru
67.	footskick.ru
68.	hotkickss.ru
69.	hypeboost.ru
70.	hypeboosts.ru
71.	jaskicks.ru
72.	kickmax.ru
73.	lgrose.ru
74.	luckshoes.ru
75.	rimisneaker.ru
.shop	
76.	hypeboost.shop
77.	sneakerwill.shop
.store	
78.	hypeboost.store
79.	pkshoes.store

Infringing Websites by Domain Name	
No.	Infringing Website
.top	
80.	perfectkicks.top
.us	
81.	rimisneaker.us
82.	sharesneaker.us
83.	sharesneakers.us
.vip	
84.	sharesneaker.vip
85.	sharesneakers.vip
86.	stockxpro.vip
87.	supersneakers.vip
.vn.ua	
88.	gmkim.vn.ua
x.yupoo.com	
89.	hewitt2303.x.yupoo.com
90.	houyw.x.yupoo.com
91.	killone.x.yupoo.com
92.	muksstore.x.yupoo.com
93.	rarerapsneaker.x.yupoo.com
94.	rarerepclothing.x.yupoo.com
95.	ulrica688.x.yupoo.com
96.	xbl0594.x.yupoo.com
.xyz	

Infringing Websites by Domain Name	
No.	Infringing Website
97.	kickwho.xyz
98.	uabat.xyz