

12. Defendant's E-commerce Store Name, associated payment accounts, and any other alias e-commerce stores or seller identification names used in connection with the sale of counterfeit and infringing goods bearing and/or using Tiffany's trademarks are essential components of Defendant's online activities and are one of the means by which Defendant furthers its counterfeiting and infringement scheme and causes harm to Tiffany. Moreover, Defendant is using Tiffany's famous name and/or trademarks to drive Internet consumer traffic to its e-commerce store operating under the E-commerce Store Name, thereby increasing the value of the E-commerce Store Name and decreasing the size and value of Tiffany's legitimate marketplace and intellectual property rights at Tiffany's expense.

COMMON FACTUAL ALLEGATIONS

Plaintiff's Business and Trademark Rights

13. Tiffany is the owner of all rights, title, and interest in and to various trademarks, which are valid and registered on the Principal Register of the United States Patent and Trademark Office, including the following trademark:

Trademark	Registration Number	Registration Date	Class / Goods
T & CO.	1,669,365	December 24, 1991	IC 14 – All Types of Jewelry Made of, or in Part of, Precious Metals and/or with Precious or Semi-Precious Stones.

(the "Tiffany Mark"). The Tiffany Mark is used in connection with the manufacture and distribution of high-quality goods in the categories identified above. A true and correct copy of the Certificate of Registration for the Tiffany Mark is attached hereto as Composite Exhibit "1."

14. The Tiffany Mark has been used in interstate commerce to identify and distinguish Tiffany's high-quality goods for an extended period of time.