

case would mean that multiple stores with the same operator would be adjudicated piecemeal and/or would need to be re-joined at a later date.

INTRODUCTION

8. This action has been filed by CB to combat the online trademark infringement and counterfeiting activity of Defendants, who trade upon Plaintiff's valuable reputation and goodwill by offering for sale and selling unauthorized and unlicensed products using counterfeit versions of Plaintiff's federally registered trademarks.

9. Plaintiff, CBParis Group Limited, is the owner of the federally registered trademarks associated with the fashion brand Casablanca, listed in the table below – true and correct copies of which are attached hereto as **Exhibit 1** (collectively, “CB Trademarks”).

CASABLANCA TRADEMARKS			
REG. NO.	MARK	CLASS(ES) OF GOODS & SERVICES	REG. DATE
6,126,847	CASABLANCA TENNIS CLUB	IC 003: Cosmetics; non-medicated toiletries; body cleaning and beauty care preparations; serums for cosmetic purposes; cosmetic masks; sunscreen preparations; facial moisturizers; non-medicated soaps; essential oils for aromatherapy use, essential oils and essential oils blends; talcum powder; hair care preparations; non-medicated skin care preparations; skin toners; nail care preparations; potpourri; non-medicated bath salts; non-pharmaceutical essential oils for treatment of ailments; antiperspirants; deodorants. IC 014: Precious metals and their alloys; precious stones; semi precious stones; pearls; jewellery cases; ornamental lapel pins; ornaments in precious metals or coated therewith, in the nature of jewelry; pins and clips, namely, tie clips, tie pins, ornamental lapel pins, breast pins being jewelry; pendants; key rings of precious metals; jewellery; precious stones; costume jewellery; horological and chronometric instruments and apparatus, namely, clocks, stopwatches, watches, and timepieces; real and imitation jewellery, namely, rings, earrings, bracelets, necklaces, cufflinks and cameos; decorative key fobs coated with precious metal; key rings featuring trinkets and fobs of precious metal; badges of precious metals; brooches; buckles for watch bands; jewellery plated with precious metals; metal key chains; metal key rings; key holders of precious metal; key chains. IC 018: Leather and imitations of leather; bags, namely, overnight bags, weekend bags, evening bags, handbags, gym bags, sports bags, beach bags; athletic bags; flight bags; travel bags; garment bags for travel; leather shopping bags; beach bags; satchels; luggage; luggage tags; suitcases; cosmetic cases sold empty; baby slings, namely, baby carriers worn on the body; toiletry cases sold empty; vanity cases sold empty; bags for shaving kits sold empty; cosmetic bags sold empty; attaché cases; shoulder bags;	Aug. 18, 2020

CASABLANCA TRADEMARKS			
REG. NO.	MARK	CLASS(ES) OF GOODS & SERVICES	REG. DATE
		backpacks; knapsacks; gym bags; duffel bags; tote bags; book bags; hand bags; purses; clutch purses; change purses; briefcases; briefcase-type portfolios; business card cases; credit card cases; calling card cases; key cases; coin pouches; wallets; umbrellas and parasols; clothing for pets. IC 025: Clothing, namely, tops, bottoms, loungewear, bath robes, suits, shirts, trousers, t shirts, sweat shirts, hoodies, track suits, scarves, jackets, coats, rainwear, scarves, sweaters, shorts, swimming trunks, dresses, skirts; footwear; headgear, namely, hats, caps, visors.	
7,909,817	CASA BLANCA	IC 003: Cosmetics; non-medicated soaps; perfumery, toilet water of all kinds, particularly perfume, eau de toilette, deodorants for personal use; essential oils; hair lotions, hair cleaning and haircare substances; creams for the skin for cosmetic purposes and lotions for cosmetic purposes; shaving substances; products for after-shave care, namely, after-shave; dentifrices; cosmetic bathing additives, namely, non-medicated bath salts; lipsticks; cotton buds for cosmetic purposes; nail polish; make-up. IC 018: Leather and imitations of leather; animal skins, hides; trunks being luggage; briefcases and suitcases; leather shopping bags, handbags, school satchels, school bags, sports bags, rucksacks; pencil cases; leather travelling bag sets; small articles of leather, namely, handbags, cosmetic cases sold empty, toiletry cases sold empty, vanity cases sold empty, bags for shaving kits sold empty, cosmetic bags sold empty, purses, clutch purses, change purses, business card cases, credit card cases, calling card cases, key cases, coin pouches, wallets; purses, pocket wallets, key cases, hip bags, belt bags; umbrellas, parasols and walking sticks; whips, harness and saddlery. IC 025: Clothing, namely, tops as clothing, bottoms as clothing, loungewear, bath robes, suits, shirts, trousers, t-shirts, sweat shirts, hoodies, track suits, scarves, jackets, coats, rainwear, scarves, sweaters, shorts, swimming trunks, dresses, skirts; headwear; upper clothing for gentlemen and ladies, namely, shirts, t-shirts, sweat shirts, hoodies, jackets, coats, rainwear, sweaters; upper clothing for children, namely, shirts, t-shirts, sweat shirts, hoodies, jackets, coats, rainwear, sweaters; underwear and under-garments; corsets being clothing; hosiery; bathing suits for gentlemen and ladies; scarves, gloves, ties as clothing, headscarves, beach cover-ups; clothing for hiking, trekking, outdoor sports and climbing, namely, shirts, t-shirts, sweat shirts, hoodies, jackets, coats, rainwear, sweaters, pants, shorts; leisure and city shoes for gentlemen, ladies and children; clothing and headwear for soccer, basketball, handball and volleyball, for jogging, fitness training and gymnastics, for tennis, squash and badminton, for in-line skating, skateboarding, roller-skating as well as hockey, football, baseball, cycling, horse-riding, golf, for water sports, particularly for surfing, sailing, rowing and canoeing, for alpine skiing, cross-country skiing and snowboarding, for ice-skating and ice hockey, namely, shirts, t-shirts, sweat shirts, hoodies, track suits, jackets, pants, shorts; all of the aforementioned clothing and headwear not for protection or safety purposes; children's wear, namely, tops as clothing, bottoms as clothing, shirts, trousers, t-shirts, sweat shirts, hoodies, jackets, coats, rainwear, sweaters, shorts, swimming trunks, dresses, skirts; baby nappies of textile materials.	Aug. 26, 2025