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Ideavillage Products Corp.

18 CV 6266

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IDEAVILLAGE PRODUCTS CORP.,
Plaintiff

v.

29SHYANS2012, 29V-DAILYFU, 500-MILES,
AIEASYGO, ALIDECAL, ALWAYSBEST_UK,
AMAZSHOPP, AMERICAMAZING,
APPLEINTHEBOX, AZO-SHOP,
BATTERYPOWERMALL, BC_EMPORIUM,
BE-MAKEUP-2016, BEST4DEALS2013,
BETTYMARKET-TRADE2017,
BUYHERE4DEALS, CAR-DVD-GPS, CAR-
MULTIMEDIA-MANUFACTURER,
COMMON-NEEDS_989, CRANKLAHRAS,
CUTE*KIKI, DAILIDEAL86, DBONSALE,
DELUXEBEAUTYDEALS, DIGIBABYBOY,
DK888STORE2012, DVDGPS-
MANUFACTURER, EHOME-MALLTRADE-
ZONE, ELMAGICO2018,
EMERALD.EMPIRE.SHOP,
ENOUGHCLOUDS, EVERYSALE4U4,
FASHIONSELLER9002, FASHIONTECHOD,
IXCRACKED, FOR.BEAUTY,
FOREVERDEALS106, FUUJ6695,
GREATDEAL335, HAELO-0,

CIVIL ACTION No.

**DECLARATION OF SPENCER
WOLFGANG AND ACCOMPANYING
EXHIBITS IN SUPPORT OF
PLAINTIFF'S *EX PARTE*
APPLICATION FOR: 1)
TEMPORARY RESTRAINING
ORDER; 2) AN ORDER
RESTRAINING ASSETS AND
MERCHANT STOREFRONTS; 3) AN
ORDER TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION
SHOULD NOT ISSUE; 4) ORDER
AUTHORIZING ALTERNATIVE
SERVICE BY ELECTRONIC
MEANS AND 5) ORDER
AUTHORIZING EXPEDITED
DISCOVERY**

FILED UNDER SEAL

HAPPYENDING1920, HARRYNILSON,
HAZEINAS7, HEZHIHUA2017,
HOMEFASHIONCHOICE, HONGXIANG6,
HUIWAN2016, IMIKIMISHOP, INOLITE2016,
JINGCHENGFACTORY, JINLE-ZHAN,
JORDEN-SHOP2018, JUST-PERFECT-1840,
KEVINFANG128, KINGMOST1115, KING-
SELLING, KJ-STORE, KOLORRAINBOW,
LEMON-BEST2012, LIAOJIANGANG145-2,
LILLY_BETTER, LIUYU_1, LOYALTY2017,
LUCKJEWELRYSTORE, LUCKY-WORLD15,
MARKSHOPDEALS, MATAN3333, MEDLIFE-
STORE, METIKTECHNOLOGY,
MIXMIXMIXMIX, MYVENUSSHOP77,
NALANTRADE, NINADAVIS98,
ORIGHTHERE, PAPA-BABY, PRO-
DEAL_5680, PUPU888, ROY_CAR, SAWA-
STORE2018, SEYCHELLES_US02,
SHUANGFENGSHIYE, SMARTOPLED,
SPEAR-8487, STORE-REPLICAS,
SUPERSUPER7, TIKTAK.SHOP,
TIMBE.OUTLET, TREEDEAL,
UNISTORE2014, UWORLDBUYING,
VIDALI_6, VOGUETECH,
WONDER4SHOPPING, WUQIN18,
WUZHANG19950, WWHOP, XD-
SMARTSHOP, YAJIE1956,
YOUR_BEST_SELECTION, YSTORE4U,
ZENGNIAN547-8, ZHANGQS-1 and ZXH1975,

Defendants

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DECLARATION OF SPENCER WOLGANG¹

I, Spencer Wolfgang, hereby declare as follows:

1. I am an attorney with the law firm of Epstein Drangel LLP (“Epstein Drangel”), located at 60 East 42nd Street, Suite 2520, New York, New York 10165 and represent Plaintiff Ideavillage Products Corp. (“Ideavillage” or “Plaintiff”) in the above-referenced action. I make and submit this declaration in connection with Ideavillage’s *ex parte* application for the following: 1) a temporary restraining order; 2) an order restraining assets and Merchant Storefronts; 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing alternative service and 5) an order authorizing expedited discovery against the above-named Defendants in light of Defendants’ intentional and willful offerings for sale and/or sales of Counterfeit Products (as defined *infra*) (“Application”).
2. Epstein Drangel represents Ideavillage in intellectual property matters and has been trained by Ideavillage on how to identify Counterfeit Products.
3. Based on my research, eBay.com is a San Jose, California-based online marketplace and e-commerce platform owned by eBay Inc., a Delaware corporation, that allows manufacturers and other third-party merchants, like Defendants, to advertise, distribute, offer for sale and/or sell in what it characterizes as either auction-style or fixed-price formats and ship their retail products, which, upon information and belief, originate from China,² among other locations, directly to consumers worldwide and specifically to consumers residing in the U.S., including in New York (hereinafter “eBay”).

¹ Where a defined term is referenced herein and not defined herein, the defined term should be understood as it is defined in the Complaint or Application.

² See Andy Goldman, *The World’s Top eBay Sellers*, WEBRETAILER (Sept. 18, 2017), <https://www.webretailer.com/lean-commerce/worlds-top-ebay-sellers/>.

4. A significant number of third-party merchants that have User Accounts (as defined *infra*) with and operate Merchant Storefronts (as defined *infra*) on eBay, like Defendants, are located in China.³
5. Of the top third-party merchants selling on eBay, 85% are based in mainland China or Hong Kong.⁴
6. Currently, eBay has a base of 25 million third-party merchants and 168 million active buyers.⁵
7. Over the past 20 years, eBay has become one of the most popular e-commerce platforms in the world, currently placing it as the sixth most popular website in the U.S.⁶
8. At any given time, eBay contains some 100 million listings and more than six million new listings are posted on it daily.⁷
9. My research also revealed that eBay aggressively uses the internet, including Facebook, Tumblr, Twitter and Instagram, to market itself and the products offered for sale and/or sold by its third-party merchant users to potential consumers, particularly those in the U.S.⁸ For example, 10% of the traffic eBay sends from its Facebook page to eBay.com converts into bids and/or purchases.⁹
10. As recently addressed in news reports,¹⁰ and as reflected in the federal lawsuits filed against third-party merchants offering for sale and selling infringing and/or counterfeit products

³ See *id.*

⁴ See *id.*

⁵ See Michael Guta, *There are 168 Million Active Buyers on eBay Right Now (INFOGRAPHIC)*, SMALL BUSINESS TRENDS (Mar. 23, 2018), <https://smallbiztrends.com/2018/03/ebay-statistics-march-2018.html>.

⁶ See *id.*

⁷ See *id.*

⁸ See Christopher Ratcliff, *How eBay uses social media: Tumblr, Twitter and Instagram*, ECONSULTANCY (Jan. 22, 2015), <https://econsultancy.com/blog/66000-how-ebay-uses-social-media-tumblr-twitter-and-instagram>.

⁹ See *10 WAYS IN WHICH EBAY IS DRIVING SALES THROUGH SOCIAL MEDIA*, INTERNET OF THINGS EVENTS, <https://www.iotevents.org/10-ways-in-which-ebay-is-driving-sales-through-social-media/>.

¹⁰ See Andi Sykes, *Specialized Wages Ware on Counterfeiters* (Dec. 9, 2016), available at <http://singletrackworld.com/2016/12/specialized-wages-war-on-counterfeiters/>.

on eBay,¹¹ an astronomical number of counterfeit and infringing products are sold and/or offered for sale on eBay at rampant rates.¹² For example, a consumer watchdog organization found that eBay accounts for 61% of the 25 million counterfeit products that the organization removed from various e-commerce platforms, including Amazon, Alibaba/AliExpress and Walmart.¹³ eBay spends approximately \$5 million per year to attempt to alleviate its counterfeiting issues.¹⁴

11. Despite the fact that the eBay has a system in place to report intellectual property infringement, sellers of counterfeit and/or infringing products frequently re-post their listings for such products on their respective Merchant Storefronts on eBay once taken down or open new User Accounts and/or Merchant Storefronts on eBay under different seller names and post the same and/or similar listings for counterfeit and/or infringing products.

12. Given our experience in policing against counterfeiters on eBay and other similarly-situated online marketplaces, sellers operating User Accounts and Merchant Storefronts, like Defendants, often use evasive tactics, such as aliases, false addresses and other

¹¹ See, e.g., *Cartier Int'l A.G. v. Replicapaneraiwatches*, 2018 U.S. Dist. LEXIS 8190, Case No. 17-62401-CIV-MOORE/SNOW (S.D. Fla. Jan. 17, 2018); *Gucci Am., Inc. v. BerryArt*, 2016 U.S. Dist. LEXIS 190557, Case No. 16-60771-CIV-WILLIAMS (S.D. Fla. May 12, 2016) and *Michael Kors L.L.C. v. Alwaysmylove*, 2016 U.S. Dist. LEXIS 190599, Case No. 16-CIV-60011-DIMITROULEAS/SNOW (S.D. Fla. Feb. 3, 2016).

¹² See Christina Warren, *Ebay Is Finally Doing Something About Counterfeit Goods*, GIZMODO (Jan. 12, 2017), <https://gizmodo.com/ebay-is-finally-doing-something-about-counterfeit-goods-1791138822>; see also United States Government Accountability Office, Report to the Chairman, Committee on Finance, U.S. Senate, Intellectual Property: Agencies Can Improve Efforts to Address Risks Posed by Changing Counterfeits Market (2018) and *eBay, Amazon Cracking Down on Counterfeit Goods Sold on their Sites*, WSB Radio (Mar. 5, 2018), <https://www.wsbradio.com/video/local-video/ebay-amazon-cracking-down-counterfeit-goods-sold-their-sites/wSlkAYC27NEnMp61rRpKaJ/> (discussing an undercover study by the United States Government Accountability Office which found that nearly half of the products bought from third party sellers on Amazon and eBay were fake).

¹³ See Ben Unglesbee, *Can Amazon and its marketplace rivals fix their counterfeits problem?*, RETAIL DIVE (April 9, 2018), <https://www.retaildive.com/news/can-amazon-and-its-marketplace-rivals-fix-their-counterfeits-problem/520301/>; see also THE COUNTERFEIT REPORT, <https://www.thecounterfeitreport.com/>.

¹⁴ See Declan McCullagh, *eBay wins counterfeit-sales suit filed by Tiffany*, CNET (July 15, 2008), <https://www.cnet.com/news/ebay-wins-counterfeit-sales-suit-filed-by-tiffany/>.

incomplete identification information to conceal their identities and avoid detection. These tactics commonly are used to attempt to circumvent restraining orders and other remedies issued with prior notice, by disappearing or claiming ignorance of their responsibilities while simultaneously destroying any evidence of their counterfeiting actions and draining their financial accounts.

13. Based upon my research, and upon information and belief, because eBay prohibits sellers from displaying their contact information, including, but not limited to, emails and phone numbers, sellers, like Defendants, use eBay as a means for selling infringing and/or counterfeit products with almost total anonymity.¹⁵ Also based upon my research, and upon information and belief, Defendants rarely, if ever, provide registered business names or trade names, contact names, complete addresses or any other contact information on their Merchant Storefronts.
14. On behalf of Ideavillage, Epstein Drangel retained New Alchemy Limited (“NAL”), a company that provides trademark infringement research services, to investigate and research manufacturers, wholesalers and/or third-party merchants offering for sale and/or selling products bearing and/or using the Touch Marks and/or marks that are confusingly similar to, identical to and constitute an infringement of the Touch Marks and/or displaying and/or incorporating the Touch Works and/or works that are substantially similar to, identical to and constitute infringement of the Touch Works and/or otherwise infringe Plaintiff’s Touch Products (“Counterfeit Products” or “Infringing Products”) on eBay.
15. It is my experience that discovery will reveal that certain Defendants are related insofar as they engage in coordinated operations involving the manufacturing, distributing, offering

¹⁵ See <https://pages.ebay.com/seller-center/seller-updates/2017summer/listing-policy-updates.html>.

for sale and sale of Counterfeit Products.¹⁶

16. Through visual inspection of Defendants' listings for Counterfeit Products ("Infringing Listings"), Epstein Drangel confirmed that the products that each Defendant offered for sale using virtually identical copies of the Touch Marks and/or Touch Works are, in fact, Counterfeit Products.
17. A representative sample of true and correct images of the Counterfeit Products taken from Defendants' Infringing Listings in comparison to true and correct images of Ideavillage's authentic Touch Products are attached hereto as **Exhibit A** and incorporated herein by reference.
18. Through visual inspection of the Infringing Listings, we also confirmed that each of Defendants' Infringing Listings are in English and accept payment in U.S. dollars.
19. Additionally, our visual inspection of the Infringing Listings revealed that certain Defendants appear to be manufacturers and/or trading companies that offer the Counterfeit Products through eBay at below-market prices.
20. In light of the multiple Defendants involved in this action, most of whom are shipping the same from China with significant lead times (potentially causing an unnecessary and unreasonable delay in the filing of this action), since through the visual inspection of the Infringing Listings we are able to confirm with certainty that the Counterfeit Products offered for sale by each Defendant in the Infringing Listings are, in fact, counterfeit, the low prices at which Defendants are offering the Counterfeit Products and because no authentic Touch Products whatsoever are available on eBay, we have not instructed NAL

¹⁶ For example, in a similar case involving the sale of counterfeit toys on a similar online marketplace platform by China-based defendants, preliminary discovery and a subsequent initial investigation connected seven of the defendants as related entities. *See WowWee Group Limited, et al. v. HAOQIN, et al.*, No. 17-cv-9893 (WHP) (S.D.N.Y. Jan. 9, 2018).

- to complete the purchases for the Counterfeit Products from each and every Defendant.
21. Epstein Drangel did, however, make five (5) purchases of Counterfeit Products from a representative sampling of Defendants. True and correct copies of the Order Confirmations are attached hereto as **Exhibit B** and incorporated herein by reference.
 22. We also reviewed each of Defendants' User Accounts and Merchant Storefronts and confirmed that many Defendants use unidentifiable seller names unassociated with a registered business, manufacturing company or trading company. Moreover, most Defendants fail to disclose an accurate or complete address or any other contact information on their respective User Accounts or Merchant Storefronts on eBay.
 23. For this reason and the reasons discussed earlier, the true identities, locations and contact information of Defendants, as well as the locations of the Counterfeit Products that Defendants are offering for sale and/or selling, are unclear and virtually impossible for Ideavillage to obtain independently.
 24. We have used RPost's online services and confirm that its services include verifying valid proof of authorship, content and delivery of an email as well as the official time and date an email was sent and received.
 25. It is our experience that sellers of counterfeit and/or infringing products, such as Defendants, are in constant communication with each other and regularly participate in online chatroom discussions involving pending litigation and potential new lawsuits.
 26. Moreover, the Chinese Ministry of Commerce published an article regarding Epstein Drangel's involvement in litigation regarding the sale of Chinese counterfeits on e-commerce platforms.¹⁷

¹⁷ See <http://shangwutousu.mofcom.gov.cn/article/resume/af/201711/20171102664964.shtml>.

27. In our experience, a small group of attorneys represent defendants in anti-counterfeiting lawsuits similar to the case at hand, and we have been informed by said defense counsel that they closely monitor the PACER docket, looking for potential new cases and clients.
28. Neither I, nor anyone else at Ideavillage, to the best of my knowledge, have publicized this Application or Ideavillage's intent to seek entry of a temporary restraining order against the Defendants to any third party.

I declare under the penalty of perjury under the laws of the United States of America that to the best of my knowledge the foregoing is true and correct.

Executed on this 11th day of July 2018 in New York,
NY.

By: Spencer Wolfgang
Spencer Wolfgang

EXHIBIT A



common-needs_989



greatdeal335





harrynilson



inolite2016





origthere



voguetech



EXHIBIT B

DEFENDANT alwaysbest_uk

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Item (1)	\$22.49
Shipping	Free

Order total **\$22.49**

By clicking Confirm and pay, you agree to the PayPal [terms](#) and [Privacy Policy](#). Payment processed by PayPal. No PayPal account required.

Confirm and pay[See details](#)**Ship to**

Jason Drangel
60 E 42nd St, Ste 2520
New York, NY 10165-0011
United States
(914)xxxxx97
[Change](#)

Review item and shippingSeller: alwaysbest_uk | [Message to seller](#)**Hair Remover Epilators**

Women Flawless Legs Wet Dry Hair Remove
Finishing Touch Painless Hair Remover
Model: US Plug

\$22.49

Quantity

1


**Delivery**

Est. delivery: Jul 18 - Aug 7
ePacket delivery from China
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[ViewFeedback&userid=alwaysbest_uk](#))

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Estimated delivery **Wednesday, Jul 18, 2018 - Tuesday, Aug 7, 2018**

Hair Remover Epilators



Women Flawless Legs Wet Dry Hair Remove Finishing Touch Painless Hair Remover
(<http://www.ebay.com/itm/282995427344>)

Item price \$22.49

Quantity 1

Item number 282995427344

Shipping service ePacket delivery from China

Contact seller (http://contact.ebay.com/ws/eBayISAPI.dll?FindAnswers&frm=3998&iid=282995427344&redirect=0&requested=alwaysbest_uk)

Return item (https://www.ebay.com/rtn/Return/ReturnViewSelectedItem?transactionId=1857982130018&itemId=282995427344&_trksid=p2057872.m2749.i3185)

Shipping address

Jason Drangel
60 E 42nd St
Ste 2520
New York NY 10165-0011
United States

Order total

Subtotal	\$22.49
Shipping	Free
	Total
	\$22.49

Order placed on
Thursday, Jul 5, 2018

Payment method
Credit card

Payment date
Thursday, Jul 5, 2018

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<input type="radio"/>	Special financing available. Apply now. See terms
<input checked="" type="radio"/>	Credit or debit card x-3007 ▼

Item (1)	\$3.86
Shipping	Free
<hr/>	
Order total	\$3.86
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United States
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Facial Finishing Touch Flawless Women Painless Hair Remover Face Hair Epilators
Model: Epilator

Quantity

Delivery

- Est. delivery: Jul 23 – Aug 24
Economy Shipping from outside US - Free
- Est. delivery: Jul 14 – Aug 3
ePacket delivery from China - \$2.49

\$3.86

Gift cards, coupons, eBay Bucks

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Estimated delivery **Monday, Jul 23, 2018 - Friday, Aug 24, 2018**



Facial Finishing Touch Flawless Women Painless Hair Remover Face Hair Epilators
(<http://www.ebay.com/itm/222827992060>)

Item price \$3.86

Quantity 1

Item number 222827992060

Shipping service Economy Shipping from outside US

Contact seller (<http://contact.ebay.com/ws/eBayISAPI.dll?FindAnswers&frm=3998&iid=222827992060&redirect=0&requested=buyhere4deals>)

Return item (https://www.ebay.com/rtn/Return/ReturnViewSelectedItem?transactionId=2105516082012&itemId=222827992060&_trksid=p2057872.m2749.i3185)

Shipping address

Jason Drangel
60 E 42nd St
Ste 2520
New York NY 10165-0011
United States

Order total

Subtotal	\$3.86
Shipping	Free
	Total
	\$3.86

Order placed on
Thursday, Jul 5, 2018

Payment method
Credit card

Payment date
Thursday, Jul 5, 2018

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New York, NY 10165-0011
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Review item and shipping

Seller: greatdeal335 | [Message to seller](#)

Women Painless Face Facial Hair Removal Shaving Mini Electric Epilator Body
\$4.99

Quantity

Delivery

Est. delivery: Jul 27 - Aug 30
Economy Shipping from outside US
Free

Est. delivery: Jul 19 - 30
Standard Shipping from outside US
\$3.59

Item (1)	\$4.99
Shipping	Free
Order total	\$4.99

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Estimated delivery **Friday, Jul 27, 2018 - Thursday, Aug 30, 2018**



Women Painless Face Facial Hair Removal Shaving Mini Electric Epilator Body
(<http://www.ebay.com/itm/263576925833>)

Item price \$4.99

Quantity 1

Item number 263576925833

Shipping service Economy Shipping from outside US

Contact seller (<http://contact.ebay.com/ws/eBayISAPI.dll?FindAnswers&frm=3998&iid=263576925833&redirect=0&requested=greatdeal335>)

Return item (https://www.ebay.com/rtn/Return/ReturnViewSelectedItem?transactionId=2253908966016&itemId=263576925833&_trksid=p2057872.m2749.i3185)

Shipping address

Jason Drangel
60 E 42nd St
Ste 2520
New York NY 10165-0011
United States

Order total

Subtotal	\$4.99
Shipping	Free
	Total
	\$4.99

Order placed on
Thursday, Jul 5, 2018

Payment method
Credit card

Payment date
Thursday, Jul 5, 2018

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Item (1)	\$6.64
Shipping	Free

Order total	\$6.64
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Women's Painless Hair Removal Facial Face
Body Flawless Remover Trimmer Shaver

\$6.64~~\$6.99~~

Quantity

1


**Delivery**

Est. delivery: Jul 18 - Aug 7
ePacket delivery from China
Free

Gift cards, coupons, eBay Bucks

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FLAWLESS



Women's Painless Hair Removal Facial Face Body Flawless Remover Trimmer Shaver (<http://www.ebay.com/itm/282861318559>)

Item price \$6.64

Quantity 1

Item number 282861318559

Shipping service ePacket delivery from China

Contact seller (<http://contact.ebay.com/ws/eBayISAPI.dll?FindAnswers&frm=3998&iid=282861318559&redirect=0&requested=inolite2016>)

Return item (https://www.ebay.com/rtn/Return/ReturnViewSelectedItem?transactionId=1857969427018&itemId=282861318559&_trksid=p2057872.m2749.l3185)

Shipping address

Jason Drangel
60 E 42nd St
Ste 2520
New York NY 10165-0011
United States

Order total

Subtotal	\$6.64
Shipping	Free
Total	\$6.64

Order placed on
Thursday, Jul 5, 2018

Payment method
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Payment date
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Ipcs Facial Finishing Hair Remover Women
Touch Flawless Painless Hair Epilators

\$3.85

Quantity

1



Delivery



Est. delivery: Jul 25 – Aug 28
Economy Shipping from outside US
Free



Est. delivery: Jul 18 – Aug 7
ePacket delivery from China
\$2.99

Item (1)	\$3.85
Shipping	Free

Order total	\$3.85
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(<http://www.ebay.com/itm/391945544719>)

Item price \$3.85
Quantity 1
Item number 391945544719
Shipping service Economy Shipping from outside US

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Shipping address

Jason Drangel
60 E 42nd St
Ste 2520
New York NY 10165-0011
United States

Order total

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Shipping	Free
Total	\$3.85

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