

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

OMEGA SA,

Plaintiff,

v.

XIE ZHENMIN, *et al.*,

Defendants.

Civil Action No.: 12-cv-9338 (SAS)

Judge: Scheindlin

PLAINTIFF'S NOTICE OF MOTION FOR A
TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

Plaintiff, Omega SA, pursuant to 15 U.S.C. § 1116 and Fed. R. Civ. P. 65, respectfully moves the Court for a temporary restraining order, and upon expiration of the temporary restraining order for entry of a preliminary injunction against the following Defendants continued operation of websites that advertise, offer to sell and sell counterfeit goods: Xie Zhenmin and Zhenmin Xie (Watches-vogue.com), Shenzhen Lai Wode Technology Co., Ltd (Watchdear.com), John Doe 1 (Queenofwatches.com), is Shaped Design Co., Ltd. and Wang Junxi (Replicaup.com), Shanghai Jing Hao Machinery Co., Ltd. and Jinglei Wang (Watchmimic.com), Guangren Wang (Watchkind.com), John Doe 2 (Myfavomega.com), John Doe 3 (Omegaonlineoutlet.com), Qi Tang (Omegaonlineoutlet.biz), Bony Huny (Omegaonlineoutlet.net), John Doe 4 (Qualityreplica.biz), Meng Luo (Qualityreplica.info), Menge Luony (Qualityreplica.us), Paul Fiore (Bestreplicawatchesok.com), Mingqin Liu (Swisskiss.net), Zhu Yong (Sinohorloge.com), Xie Jun (Saleswiss.com), Fan (Watchesyes.net), John Doe 5 (Replicavip.org), Li Guangping (Watchc.com), Guangzhou Shouai Trading Co., Ltd

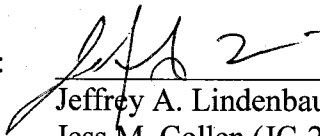
and Zhang Shungliang (Watchespay.net), Optical Automation Instrument Co., Ltd. and Zhan Lixiong (Replicabuy.net), Lai Shuang (Watch7750.com), Xiaojie Ma (Swissale.net), Li Yuanming (Replicafind.net), Weichengwang (Salesreplicas.com), Baoling Yang (Replicwalker.com), Intellectual Property Agency Ltd. and Jie Xu (Replicaprice.com), Zhi Technology Co., Ltd. and Yukun Cui (Watchesfull.com) and John Does 6-34.

Good cause for entry of the temporary restraining order and for permitting same on an *ex-parte* basis is supported by the concurrently filed memorandum of law and declarations of Jeffrey A. Lindenbaum, Lauren Kennedy, and Colleen Hurley and exhibits attached thereto.

Plaintiff respectfully requests that the Court grant this motion for a temporary restraining order and schedule a hearing on Plaintiff's application for a preliminary injunction.

Respectfully submitted
for Plaintiff,

By:



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Dated: December 21, 2012

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