

trademark infringement, trademark dilution, and unfair competition under the laws of the State of California.

2. This Court has original jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1332 and 1338(a) and (b); and 15 U.S.C. §§ 1116 and 1121. This Court has jurisdiction pursuant to the principles of supplemental jurisdiction and 28 U.S.C. § 1367 over Plaintiffs' claims for trademark infringement, trademark dilution, and unfair competition under the laws of the State of New York.

3. This Court has personal jurisdiction over Defendants in that they transact business in the State of New York and that Defendants' tortious conduct outside the State of New York has caused injury to Plaintiff and Plaintiff's property in the State of New York, where Plaintiff has its principal place of business in the United States.

4. Venue is proper in this district under 28 U.S.C. § 1391(c) because this Court has personal jurisdiction over Defendants in this judicial district.

THE PARTIES

5. Plaintiff Christian Louboutin S.A. is a corporation, organized and existing under the laws of France, having its principal place of business at 19 rue de Jean-Jacques Rousseau, Paris, France 75001 ("Louboutin S.A."). Plaintiff also maintains a showroom and office at 306 West 38th Street, New York, NY, USA.

6. Plaintiff Christian Louboutin is an individual and a citizen of the country of France with an address at 1 rue Volney, Paris, France 75002. The Plaintiffs identified in Paragraphs 5 and 6 are hereinafter identified collectively as "Plaintiffs".

7. Upon information and belief, Defendant Kuo-Hsin Yang a/k/a Sam Yang a/k/a Stan Yang is an individual residing at 1204 John Reed Court, City of Industry, California 91745. Upon information and belief, Mr. Yang is the owner of Defendant Kimera International, Inc.

8. Upon information and belief, Defendant Kimera International, Inc., also known as Liliana Shoes and Liliana, and formerly known as Liliana Footwear, is a California corporation having an address and conducting business at 17005 Evergreen Place, Suite A, City of Industry, California 91745.

9. Upon information and belief, Liliana, also known as Liliana Shoes, and formerly known as Liliana Footwear, is an unincorporated and unregistered fictitious entity used by Kimera International, Inc. to import and distribute footwear, having an address at 827 Lawson Street, City of Industry, California 91748 and 17005 Evergreen Place, Suite A, City of Industry, California 91745. The parties identified in paragraphs 7 through 9 are hereinafter collectively referred to as the "Liliana Defendants".

10. Upon information and belief, Defendants identified as various JOHN DOES and JANE DOES are various individuals and entities conducting business at various locations in the State of North Carolina and elsewhere, including those individuals who purchased Defendants' counterfeit goods bearing Plaintiffs' mark for further distribution and sale through this District and throughout the United States, and are present in and/or doing business in the State of California and subject to the jurisdiction of this Court. The identities of the various JOHN DOES and JANE DOES defendants are not presently known and the Complaint herein will be amended to include the name or names of these individuals when such information becomes available (each a "Doe" and collectively "Does").

11. Upon information and belief, Defendants, the XYZ COMPANIES, through their agents, servants, and employees are conducting business at various locations in the State of California and elsewhere, including those entities that purchased Defendants' counterfeit goods bearing Plaintiffs' mark for further distribution and sale through this District and throughout the United States, and are present in and/or doing business in the State of California and subject to the jurisdiction of this Court. The identities of such Defendants are not presently known and the Complaint herein will be amended, if appropriate, to include the names of the actual XYZ Company Defendants when such information becomes available (each a "Defendant Company" and collectively, "Defendant Companies"). The parties identified in paragraphs 7 through 11 are hereinafter collectively referred to as the "Defendants".

BACKGROUND

PLAINTIFFS' TRADEMARKS AND PRODUCTS

12. In 1991, Mr. Louboutin created the Christian Louboutin brand of women's shoes, and opened the first Christian Louboutin boutique in Paris, France. Beginning in 1992, Mr. Louboutin began using a lacquered red sole on the bottom of the Christian Louboutin brand women's shoes.

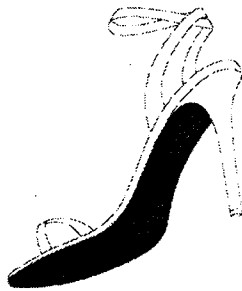
13. Plaintiffs have continuously used the red lacquered sole and other trademarks owned by Plaintiffs in connection with Plaintiffs' shoes since 1992.

14. Plaintiffs' shoes bearing the red sole have become the most sought-after and recognizable brand of shoes in the U.S. and abroad. The red sole and the name Christian Louboutin are synonymous with glamour, luxury and style. Plaintiffs' shoes are instantly recognizable based upon their distinctive red sole. Plaintiffs' shoes cost in the range of \$400 to \$3,100 per pair.

15. Plaintiffs' shoes are worn by numerous famous celebrities, fashion designers, and socialites, including Elizabeth Taylor, Oprah Winfrey, Halle Berry, Angelina Jolie, Salma Hayek, Jennifer Lopez, Sarah Jessica Parker, Diane von Furstenberg, and Princess Caroline of Monaco. Plaintiffs' shoes have been commonly referred to as the "celebrity favorite shoe" or the "celebrity shoe of choice". Shoes of Christian Louboutin S.A. have consistently topped the Luxury Institute's annual Luxury Brand Status Index and Plaintiffs' shoes have been named the Most Prestigious Women's Shoes for each of the past three years.

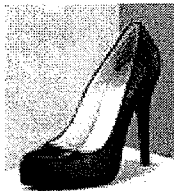
16. Plaintiffs' continuous and broad use of the red sole has expanded its renown and enabled it to achieve celebrity in the luxury goods market. The red sole trademark is highly visible as a symbol of quality and status.

17. Mr. Louboutin is the owner and Louboutin S.A. is the exclusive United States licensee of the entire right, title and interest in and to the Federally registered red sole trademark, which is the subject of U.S. Registration No. 3,361,597 (the "Red Sole Mark") and the trademark CHRISTIAN LOUBOUTIN, among others, in connection with "women's high fashion designer footwear," in Class 25 (the "Louboutin Products") (collectively, "Plaintiffs' Marks"). A copy of the Certificate of Registration for the Red Sole Mark is annexed hereto as Exhibit A, and a copy of the Red Sole Mark as registered is shown below:



18. The registration set forth in Exhibit A is valid, subsisting, unrevoked, and uncanceled. The registration of the Red Sole Mark constitutes *prima facie* evidence of its validity and conclusive evidence of Plaintiffs' exclusive right to use the Red Sole Mark in commerce in connection with the goods named therein, and commercially related goods. The registration of the Red Sole Mark constitutes constructive notice to Defendants of Plaintiffs' ownership of and exclusive rights in the Red Sole Mark.

19. Plaintiffs' Marks have achieved secondary meaning in the marketplace by virtue of many years of continuous use in commerce, enormous unsolicited press coverage, celebrity usage and substantial investment in promotion of Louboutin Products bearing the marks. Copies of photographs of a representative sample of authentic Louboutin Products bearing the Red Sole Mark are annexed hereto as Exhibit B. A photograph of a genuine Louboutin Product is shown immediately below:



20. Plaintiffs maintain strict quality control standards for all Louboutin Products. Plaintiffs inspect and approve all genuine Louboutin Products prior to distribution and sale.

21. All genuine Louboutin Products are distributed through a worldwide network of authorized Louboutin dealers.

22. To date, Plaintiffs have invested significant time and effort advertising and promoting the Louboutin Products and the Red Sole Mark in the United States and throughout the World, and display the Red Sole Mark in their advertising and promotional materials.

Plaintiffs' shoes appear on models in numerous fashion shows and in fashion spreads featured in numerous magazines. This, together with the legions of celebrities who are photographed wearing the Louboutin Products bearing the Red Sole Mark, constitutes unsolicited advertising that has resulted in widespread recognition of the Red Sole Mark and the Christian Louboutin brand. As a result, Plaintiffs have enjoyed millions of dollars in sales of the Louboutin Products. The public, customers, and the luxury goods industry have come to associate the Red Sole Mark with products of exceptional materials, style, workmanship and reliability, and come to recognize that products bearing the Red Sole Mark originate with Plaintiffs.

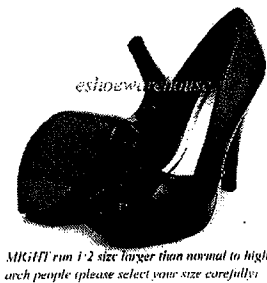
23. Plaintiffs' Marks, including its Red Sole Mark, are famous not only within the United States but throughout the World, entitling it to the greater protection afforded marks with such international distinction under both United States Law and International Treaties, such as the Paris Convention and the Trade-Related Aspects of Intellectual Property Rights (the "TRIPS Agreement"), both of which have been entered into by the United States.

DEFENDANTS' CONDUCT

24. Defendants have knowingly and willfully manufactured, imported, distributed, offered for sale, and sold various counterfeit versions of the Louboutin Products, to wit: shoes bearing the Red Sole Mark (the "Counterfeit Products").

25. Upon information and belief, the Liliana Defendants at all times relevant, manufacture, import, advertise, promote, distribute and/or sell Counterfeit Products to third party resellers and directly to individual consumers via internet websites including, *inter alia* Amazon.com and flyjane.net. Copies of a representative sample of the Liliana Defendants' listings on Amazon.com, flyjane.net, polyvore.com and bootexplosion.com, offering the Counterfeit Products for sale are attached hereto as Exhibit C.

26. The Liliana Defendants have sold Counterfeit Products to Suebsak Chantarungsi a/k/a Scott Chan a/k/a looksgreat4ever, an individual and a resident of the State of North Carolina, who was doing business under the name E Shoe Warehouse as well as S.G. Trading, Inc. (collectively, "E Shoe Warehouse"). E Shoe Warehouse, through use of an Internet site, www.eshoewarehouse.com (the "E Shoe Warehouse web site") as well as on public auctions such as eBay under the name E Shoe Warehouse and under the name looksgreat4ever, offered the Counterfeit Products for sale. A copy of one of the Counterfeit Products obtained by E Shoe Warehouse from one of the Defendants is shown below:



27. On December 18, 2009, Plaintiffs executed an ex parte seizure order against E Shoe Ware House. During that raid, Plaintiffs seized Counterfeit Products sold by Defendants to E Shoe Warehouse, together with documents evidencing Defendants' sale of Counterfeit Products to E Shoe Warehouse.

28. Defendants, in a further effort to increase public confusion, have also copied at least one style of shoe designed and produced by Plaintiffs, which Plaintiffs sell under the style name "NITONIMO." Plaintiffs' genuine NITONIMO shoe appears below, together with a depiction of Defendants' counterfeit copies of this shoe:



Plaintiffs' Authentic "NITONIMOI" Shoe



E Shoe Warehouse
Counterfeit Product



Liliana Defendants'
Counterfeit Product

29. Upon information and belief, Defendants intentionally and knowingly infringe the Red Sole Mark and allude to Plaintiffs and the Louboutin Products in advertising their Counterfeit Products in an effort to trade upon Plaintiffs' good will and the cachet associated with Plaintiffs' Products.

30. The Counterfeit Products are not genuine Louboutin Products. Plaintiffs did not manufacture, inspect, or package the Counterfeit Products, and did not approve the Counterfeit Products for sale or distribution. Defendants are not authorized to manufacture, distribute, offer for sale, or sell products bearing the Red Sole Mark. Defendants, without authorization or license from Plaintiffs, have used the Red Sole Mark in connection with Defendants' advertisement, offer for sale, and sale of the Counterfeit Products.

31. At all times relevant, Defendants were and are aware that the Counterfeit Products they sell are not genuine Louboutin Products.

32. The Liliana Defendants conduct business using aliases including Liliana, Liliana Shoes and Liliana Footwear. Since at least 2006, the Liliana Defendants have been engaged in the sale of shoes via the Internet. Upon information and belief, at all times relevant herein, the Liliana Defendants have used the domain name <www.lilianashoes.com> to host the email address, joe@lilianashoes.com, which the Liliana Defendants' use to do their business in Counterfeit Products.

33. At all times relevant herein, the Liliana Defendants have regularly sold at wholesale the Counterfeit Products throughout the United States, including in particular in this District.

34. Upon information and belief, as of the date of this Complaint, the Liliana Defendants have in their possession Counterfeit Products, the amount of which is unknown, which they are offering for sale and for which they are accepting special orders from wholesale buyers.

35. Upon information and belief, the Liliana Defendants are storing their inventory of Counterfeit Products at 17005 Evergreen Place, Suite A, City of Industry, California 91745, 827 Lawson Street, City of Industry, California 91748, and/or other locations under the Liliana Defendants' control.

36. Defendants' use of Plaintiffs' Marks on or in connection with the advertising, marketing, distribution, offering for sale, and sale of the Counterfeit Products is likely to cause confusion, mistake, or to deceive.

37. Defendants' use of the Red Sole Mark on or in connection with the advertising, marketing, distribution, offering for sale, and sale of the Counterfeit Products is causing irreparable harm to Plaintiffs.

COUNT ONE

FEDERAL TRADEMARK COUNTERFEITING AND INFRINGEMENT
(15 U.S.C. § 1114)

38. Plaintiffs repeat and re-allege the allegations of each of the foregoing paragraphs of this Complaint as if fully set forth herein.

39. Plaintiffs' Red Sole Mark and the goodwill of the business associated with it in the United States and throughout the world are of great and incalculable value, are highly distinctive and arbitrary, and have become universally associated in the public mind with the products of the very highest quality and reputation finding their source in Plaintiffs.

40. Upon information and belief, without Plaintiffs' authorization or consent, and having knowledge of Plaintiffs' well-known and prior rights in the Red Sole Mark, and the fact that Defendants' Counterfeit Products bear a mark which is confusingly similar to the Red Sole Mark, Defendants have manufactured, distributed, offered for sale and/or sold the Counterfeit Products to the consuming public in direct competition with Plaintiffs' sale of genuine Louboutin Products, in or affecting interstate commerce.

41. Defendants' use of copies or simulations of the Red Sole Mark is likely to cause and is causing confusion, mistake and deception among the general purchasing public as to the origin of the Counterfeit Products, and is likely to deceive the public into believing the Counterfeit Products being sold by Defendants originate from, are associated with, or are

otherwise authorized by Plaintiffs, all to the damage and detriment of Plaintiffs' reputations, goodwill and sales.

42. Plaintiffs have no adequate remedy at law and, if Defendants' activities are not enjoined, Plaintiffs will continue to suffer irreparable harm and injury to their goodwill and reputations.

COUNT TWO

FALSE DESIGNATION OF ORIGIN AND UNFAIR COMPETITION **(15 U.S.C. § 1125(a))**

43. Plaintiffs repeat and re-allege the allegations of each of the foregoing paragraphs of this Complaint as if fully set forth herein.

44. The Counterfeit Products sold and offered for sale by Defendants are of the same general nature and type as the Louboutin Products sold and offered for sale by Plaintiffs and, as such, are likely to cause confusion to the general purchasing public.

45. By misappropriating and using the Red Sole Mark, Defendants misrepresent and falsely describe to the general public the origin and source of the Counterfeit Products and create a likelihood of confusion among ultimate purchasers as to both the source and sponsorship of such merchandise.

46. Defendants' unlawful, unauthorized and unlicensed manufacture, distribution, offer for sale, and/or sale of the Counterfeit Products creates express and implied misrepresentations that the Counterfeit Products were created, authorized or approved by Plaintiffs, all to Defendants' profit and Plaintiffs' great damage and injury.

47. Defendants' aforesaid acts are in violation of § 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), in that Defendants' use of the Red Sole Mark, in connection with their goods

and services, in interstate commerce constitutes a false designation of origin and unfair competition.

48. Plaintiffs have no adequate remedy at law and, if Defendants' activities are not enjoined, Plaintiffs will continue to suffer irreparable harm and injury to their goodwill and reputations.

COUNT THREE

FEDERAL TRADEMARK DILUTION **(15 U.S.C. § 1125 (C))**

49. Plaintiffs repeat and re-allege the allegations of each of the foregoing paragraphs of this Complaint as if fully set forth herein.

50. Plaintiffs' Red Sole Mark is a "famous mark" within the meaning of § 43(c) of the Lanham Act, 15 U.S.C. § 1125(c) and was a famous mark prior to Defendants' conduct as alleged herein.

51. Defendants' manufacture, distribution, offer for sale, and/or sale in commerce of the Counterfeit Products is likely to and does dilute the distinctive quality of the Red Sole Mark, and was done with the willful intent to trade on Plaintiffs' reputations and/or to cause dilution of the Red Sole Mark.

52. Defendants' unauthorized use of the Red Sole Mark on or in connection with the Counterfeit Products was done with notice and full knowledge that such manufacture, distribution, sale and/or offer for sale was not authorized or licensed by Plaintiffs.

53. Defendants' aforesaid acts are in knowing and willful violation of Plaintiffs' rights under § 43(c) of the Lanham Act, 15 U.S.C. § 1125(c).

54. Plaintiffs have no adequate remedy at law and, if Defendants' activities are not enjoined, will continue to suffer irreparable harm and injury to Plaintiffs' goodwill and reputations.

COUNT FOUR

TRADEMARK INFRINGEMENT UNDER NEW YORK COMMON LAW

55. Plaintiffs repeat and reallege the allegations of each of the foregoing paragraphs of this Complaint as if fully set forth herein.

56. Defendants have, without authorization from Plaintiffs, used the Red Sole Mark to advertise, distribute, sell and offer to sell Counterfeit Products.

57. Defendants' acts as alleged herein are likely to cause confusion, mistake, and deception to consumers as to the affiliation, connection, or association of Defendants with Plaintiffs, and as to the origin, sponsorship, or approval of Defendants' goods by Plaintiffs.

58. Defendants' unauthorized acts constitute direct infringements of Plaintiffs' federal trademark registration for its Red Sole Mark in violation of California common law.

59. Upon information and belief, Defendants' conduct is intentional, malicious, and wanton in that Defendants infringed and continues to infringe Plaintiffs federal trademark registration for its Red Sole Mark (i) with full knowledge that Plaintiffs owns and has the exclusive right to use its federal trademark, (ii) with the intention of causing a likelihood of confusion and mistake and to deceive, and (iii) with the intention of eliminating competition from Plaintiffs.

60. Plaintiffs have suffered, are suffering, and will continue to suffer irreparable injury for which Plaintiffs has no adequate remedy at law. Plaintiffs therefore are entitled to a preliminary and permanent injunction against Defendants' further infringing conduct.

COUNT FIVE

TRADEMARK DILUTION UNDER NEW YORK LAW

61. Plaintiffs repeat and reallege the allegations of each of the foregoing paragraphs of this Complaint as if fully set forth herein.

62. Plaintiffs' Red Sole Mark is widely recognized by the general consuming public of the State of New York as a designation of source of the goods of Plaintiffs.

63. Defendants' acts as alleged herein are likely to cause injury to Plaintiffs' business and reputation, and dilute the distinctive quality of the Red Sole Mark. Defendants knew and intended these acts to dilute the Red Sole Mark, and injure Plaintiffs' business and reputation. Defendants' acts constitute trademark dilution under New York common law.

64. Absent injunctive relief, Plaintiffs have no means by which to control Defendants' dilution of Plaintiffs' famous Red Sole Mark. Plaintiffs are therefore entitled to injunctive relief prohibiting Defendants from continuing such acts of dilution and unfair competition.

COUNT SIX

UNFAIR COMPETITION UNDER NEW YORK LAW

65. Plaintiffs repeat and reallege the allegations of each of the foregoing paragraphs of this Complaint as if fully set forth herein.

66. The actions of Defendants as alleged above constitute common law unfair competition and false advertising under New York law, and have caused and will cause impairment of the recognition of the Red Sole Mark, and diminution of the value thereof.

67. As a result of the actions of Defendants, Plaintiffs have been and will continue to be seriously and irreparably damaged unless Defendants are enjoined from the use of false designations or representations which result in common law unfair competition with Plaintiffs.

PRAYER FOR RELIEF

Wherefore, Plaintiffs pray that Defendants be cited to appear in this case, and upon final judgment, that Plaintiffs receive the following relief:

1. That Defendants, their officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through or under them be enjoined and restrained, at first preliminarily during the pendency of this action and, thereafter, permanently:

a) from using in any manner any of Plaintiffs' Marks, including the Red Sole Mark, or any other mark which so resembles said trademark as to be likely to cause confusion, deception, or mistake on or in connection with the advertising, offering for sale, or sale of any product not emanating from Plaintiffs, or not authorized by Plaintiffs to be sold in connection with each of the Red Sole Mark;

b) from passing off, inducing, or enabling others to sell or pass off any product as and for products produced by Plaintiffs, not Plaintiffs' products, or not produced under the control and supervision of Plaintiffs and approved by Plaintiffs for sale under any of Plaintiffs' Marks, including the Red Sole Mark;

c) from committing any acts calculated to cause purchasers to believe that Defendants' products are those sold under the control and supervision of Plaintiffs, or sponsored or approved by, or connected with, or guaranteed by, or produced under the control and supervision of Plaintiffs;

d) from further diluting and infringing any of Plaintiffs' Marks, including the Red Sole Mark and damaging Plaintiffs' goodwill;

e) from otherwise competing unfairly with Plaintiffs in any manner; and

f) from shipping, delivering, distributing, returning or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiffs, nor authorized by Plaintiffs to be sold or offered for sale, and which bear any of Plaintiffs' Marks, including the Red Sole Mark, or any mark confusingly similar thereto;

2. That Defendants, their officers, agents, servants, employees, attorneys, and any persons in active concert or participation with them, and any banks, savings and loan associations or other financial institutions, or agencies which engage in the transfer of real property, who receive actual notice of the Court's order, by personal service or otherwise, shall be temporarily restrained and enjoined from transferring, disposing of, or secreting any money, stocks or other assets of Defendants, without prior approval of the Court, except as to a Defendant that files with the Court and serves upon Plaintiffs' counsel: (1) an accounting of that Defendant's assets having a value of two thousand dollars (\$2,000) or more, and the location and identity thereof; and (2) uncontradicted documentary proof accepted by Plaintiffs (such acceptance not to be unreasonably withheld) that particular assets are not proceeds of that Defendant's counterfeiting activities, in which case those particular assets shall be released to that Defendant.

3. That Defendants be required upon service of this Complaint to deliver immediately up to Plaintiffs any and all products, guarantees, circulars, price lists, labels, signs, prints, packages, wrappers, pouches, receptacles, advertising matter, promotional, and other materials in the possession of Defendants or under their control bearing any of Plaintiffs' Marks, including the Red Sole Mark, alone or in combination with any other words, or used in connection with the advertising, offering for sale or sale of products not emanating from Plaintiffs, or not made under the authorization and control of Plaintiffs.

4. That Defendants be required immediately upon service of this Complaint to supply Plaintiffs with a complete list of entities from whom they purchased and to whom they distributed and/or sold products falsely bearing any of Plaintiffs' Marks, including the Red Sole Mark, or products not authorized by Plaintiffs to be sold in connection with said mark.

5. That Defendants be required immediately upon service of this Complaint to deliver up for destruction their entire inventory of Counterfeit Products bearing any of Plaintiffs' Marks, including the Red Sole Mark.

6. That Defendants, within thirty (30) days after service of judgment with notice of entry thereof upon it, be required to file with the Court and serve upon Plaintiffs a written report under oath setting forth in detail the manner in which Defendants have complied with paragraphs 1 through 5, *supra*.

7. That Defendants account for and pay over to Plaintiffs profits realized by Defendants by reason of Defendants' unlawful acts herein alleged and, that the amount of damages for infringement of Plaintiffs' registered trademark be increased by a sum not exceeding three times the amount thereof as provided by law.

8. That Plaintiffs be awarded actual damages of an amount to be proven at trial and punitive damages in an amount to be proven at trial.

9. That Plaintiffs be awarded statutory damages in the amount of \$2,000,000 per mark infringed pursuant to 15 U.S.C. § 1117(c).

10. That Plaintiffs be awarded interest, including pre-judgment interest, on all sums.

11. That Plaintiffs be awarded reasonable attorneys' fees and have such other and further relief as the Court may deem equitable including, but not limited to, any relief set forth

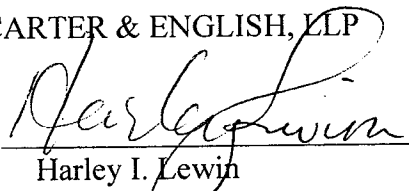
under §§ 34-39 of the 1946 Trademark Act and California Bus. & Prof. Code §§ 14247, 14250, 17500, 17535, 17200 and 17203.

12. That Plaintiffs have such other and further relief as the Court deems just and proper.

Dated: New York, New York
July 19, 2010

McCARTER & ENGLISH, LLP

By:


Harley I. Lewin

245 Park Avenue, 27th Floor
New York, NY 10167
Tel: (212) 609-6800
Fax: (212) 609-6921

*Attorneys for Plaintiffs
Christian Louboutin S.A.
And Christian Louboutin*

JURY DEMAND

Plaintiffs demand a jury trial pursuant to Rule 38(b) of the Federal Rules of Civil Procedure for all issues so triable.

Dated: New York, New York
July 19, 2010

McCARTER & ENGLISH, LLP

By: 

Harley I. Lewin

245 Park Avenue, 27th Floor
New York, NY 10167-0001
Tel: (212) 609-6800
Fax: (212) 609-6921

*Attorneys for Plaintiffs
Christian Louboutin S.A.
And Christian Louboutin*

EXHIBIT A

Int. Cl.: 25

Prior U.S. Cls.: 22 and 39

United States Patent and Trademark Office

Reg. No. 3,361,597

Registered Jan. 1, 2008

**TRADEMARK
PRINCIPAL REGISTER**



**CHRISTIAN LOUBOUTIN (FRANCE INDIVIDUAL)
24 RUE VICTOR MASSÉ
PARIS, FRANCE 75009**

**FOR: WOMEN'S HIGH FASHION DESIGNER
FOOTWEAR, IN CLASS 25 (U.S. CLS. 22 AND 39).**

FIRST USE 0-0-1992; IN COMMERCE 0-0-1992.

**THE COLOR(S) RED IS/ARE CLAIMED AS A
FEATURE OF THE MARK.**

**THE MARK CONSISTS OF A LACQUERED RED
SOLE ON FOOTWEAR. THE DOTTED LINES ARE
NOT PART OF THE MARK BUT ARE INTENDED
ONLY TO SHOW PLACEMENT OF THE MARK.**

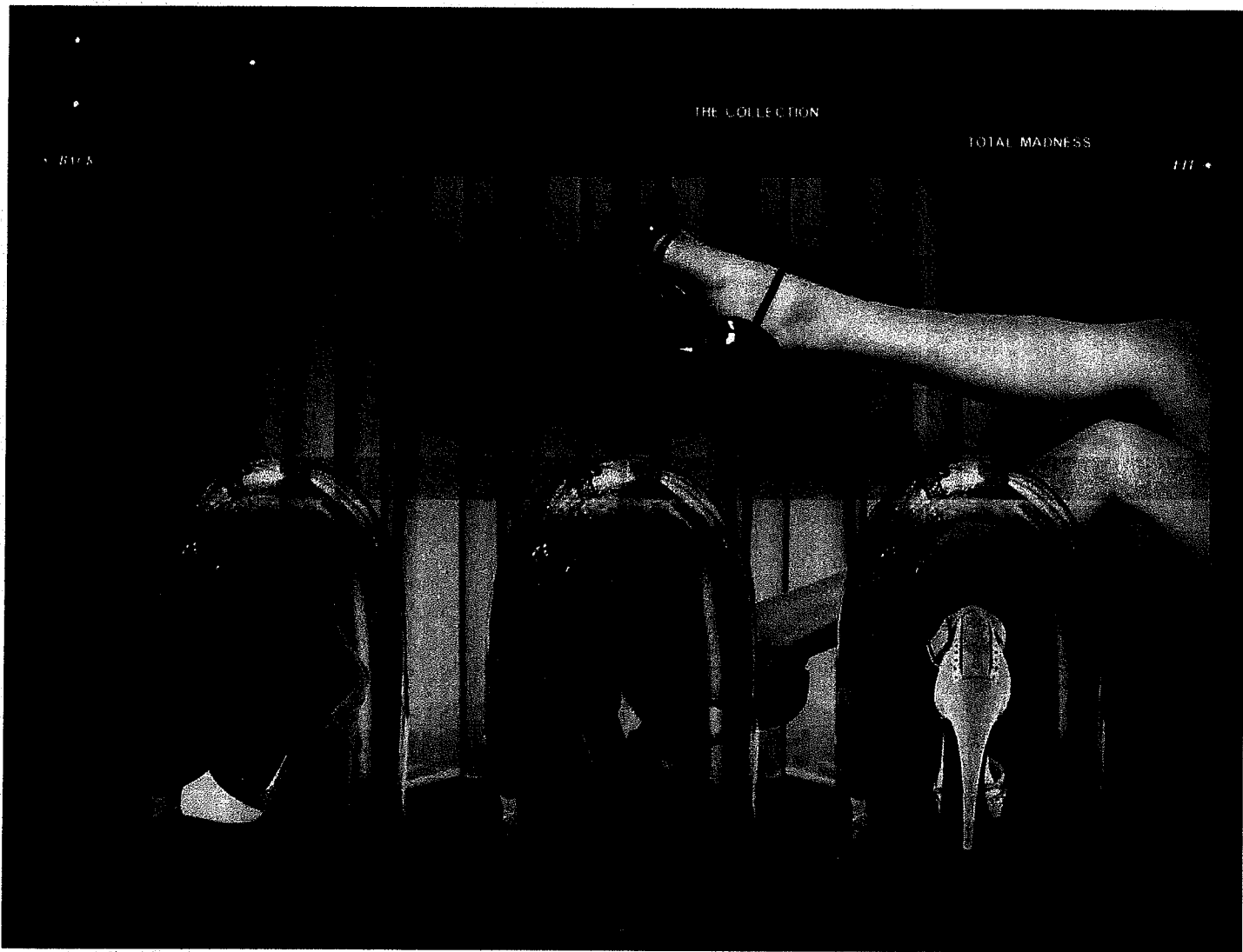
SEC. 2(F).

SER. NO. 77-141,789, FILED 3-27-2007.

NORA BUCHANAN WILL, EXAMINING ATTORNEY

EXHIBIT B









THE COLLECTION
FALL - WINTER 2009
SHOES

BACK

111




Nitoinimoi



Janene, Beverly Hills: When Fantasy becomes Reality.
That is the Nitoinimoi!

Black suede and black leather
Heel: 12 cm

[Find a Store](#)



THE COLLECTION
FALL-WINTER 2009
SHOES

• BACK

111 •



Nitoinimoi



Janene, Beverly Hills: When Fantasy becomes Reality.
That is the Nitoinimoi!

Black suede and black leather
Heel: 12 cm

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EXHIBIT C



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SHOES

BAGS

ACCESSORIES

BRANDS

NEW ARRIVALS

SALE

SHOP BY CATEGORY

- Wedges
- Pumps
- Boots
- Heels
- Sandals
- Sneakers
- Flats
- Booties
- Gladiators
- Ankle Boots
- Knee Boots
- STATEMENT Heels

SHOP BY BRAND

- Classified
- Delicious
- SODA
- Michael Antonio
- Wild Rose
- Steven by Steve Madden
- Red Hot
- Luichiny
- Best Fit
- Chinese Laundry
- Penny Loves Kenny
- Cupid
- Bonnibel
- Bamboo
- Splash
- Wild Diva
- Fahrenheit
- E.R. Generation
- Ed Hardy
- Diba
- Bronx
- MISS ME
- Cupid Luxe
- Anne Michelle
- N.Y.L.A.
- Charles Albert

Home>Shoes>STATEMENT Heels >Liliana JONES Strapped Boots

Liliana JONES Strapped Booties



Click on images to enlarge them

free standard shipping
with purchase of \$75 or more

Black | Size | Quantity

» SELECT MORE AT A TIME

\$ 64.90

*off suggested retail price: \$ 88.00

ADD TO SHOPPING CART

GLAM ROCK at its finest!

New for Fall 2009, the Jones by Liliana is edgy with great curb appeal. The round toe and strappy leather detail give you a look of confidence and great style. Use this boot to add character to any outfit.

- Man Made upper
- Strappy criss-cross faux leather detail along vamp
- European-inspired rounded toe
- 9" shaft from heel to top of boot
- 4" heel on 1" hidden platform
- Zipper on inner leg
- Red Sole
- Fits true to size
- Imported

JONES by Liliana

Women's Shoe Size Chart

Add to Wish List

Email to Friend

Need More Info

Share With a Friend

we think you'll also love...



Miss Me JOCELYN Platform Heels (Black) \$ 49.90



Braided Flap Frame Bag \$ 99.90



BANDINO Peep Toe Booties by Liliana (Black) \$ 49.90



G.O.Max LAUREN-26 Satin Peep Toe Pumps \$ 39.99

VIEW CART

Items : 0
Item Value : \$ 0.00

MY FLYJANE LOGIN

Username

Password

LOGIN

- » First time at flyJane.net?
- » Forgot your password?
- » My Hookup Points



CHANGE CURRENCY

USD United States Dollars

VIEWED ITEMS



Liliana JONES Strapped Booties \$ 64.90

Lush

Italina

Berinni

Glaze

Jeffrey Campbell

G.O. Max

Damita K

AJ Morgan

Breckelles

Bumper

Promise

Dollhouse

Blossom

Liliana

Paprika

Hypnotiq

GIFT CARDS

SHOP BY COLOR

Select color(s):



SHOP BY SIZE

Select your size:

5.5 6 6.5 7 7.5

8 8.5 9 9.5 10

11

SHOP BY PRICE

Select price range:

Select

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Liliana JONES Women's Strappy Suede Booties

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Product Features

- Faux Suede
- Heel measures approximately 4 inches
- Strappy criss-cross faux leather detail along vamp
- 9" shaft from heel to top of boot
- 4" heel on 1" hidden platform
- Red Sole
- European-inspired rounded toe

Product Description

Product Description

GLAM ROCK at its finest! New for Fall 2009, the Jones by Liliana is edgy with great curb appeal. The round toe strappy leather detail give you a look of confidence and great style. Use this boot to add character to any outfit
Liliana JONES Strappy Booties

Product Details

Shipping Information: [View shipping rates and policies](#)

ASIN: B002W4FR78

Average Customer Review: No customer reviews yet. [Be the first.](#)

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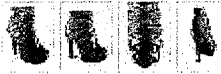
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Leatherette Strap Suede Finish Bootie

SKU: 39304

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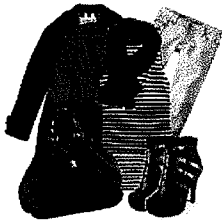
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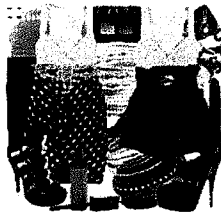
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