

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

AMAZON.COM, INC., a Delaware corporation; and SALVATORE FERRAGAMO S.P.A., an Italian corporation,

Plaintiffs,

v.

ZHAO HAO JUN, an individual d/b/a ZHAOHA032OJUN; ZHANG LIANFA, an individual d/b/a CANGZHOSHUOFENGDIANZIKEJIZZX; CANGZHOSHUOFENGDIANZIKEJIYOUX IANGONGSI, a Chinese entity; and DOES 1-10,

Defendants.

No.

COMPLAINT FOR DAMAGES AND EQUITABLE RELIEF

I. INTRODUCTION

1. This case involves the Defendants’ unlawful and expressly prohibited sale of counterfeit Salvatore Ferragamo S.p.A. (“Ferragamo”) belts on Amazon.com. Amazon and Ferragamo jointly bring this lawsuit to permanently prevent and enjoin Defendants from causing future harm to Amazon’s and Ferragamo’s customers, reputations, and intellectual property, and to hold Defendants accountable for their illegal actions.


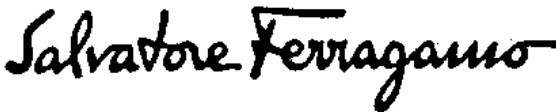
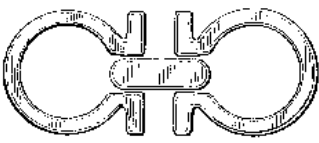

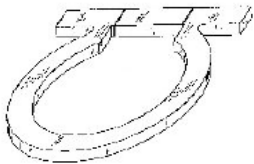
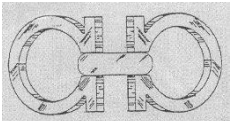
2. The Amazon store offers products and services to customers in more than 100 countries around the globe. Some of the products are sold directly by Amazon, while others are

1 sold by Amazon's numerous third-party selling partners. The Amazon brand is one of the most
 2 well-recognized, valuable, and trusted brands in the world. In order to protect customers and
 3 safeguard its reputation for trustworthiness, Amazon invests heavily in both time and resources
 4 to prevent counterfeit goods from being sold in its store. In 2019 alone, Amazon invested over
 5 \$500 million and employed more than 8,000 employees to protect its store from fraud and
 6 abuse. Amazon stopped over 2.5 million suspected bad actor selling accounts before they
 7 published a single listing for sale and blocked more than six billion suspected bad listings
 8 before they were published. As a result of these efforts and investment, 99.9% of all products
 9 viewed by customers on Amazon did not have a valid counterfeit complaint.

10 3. Ferragamo, which has always been a byword for top quality and Made in Italy
 11 products, is one of the main players in the luxury industry and its origins date back to 1927.
 12 Ferragamo is mainly active in the creation, production and sale of footwear, leather goods,
 13 apparel, silk products, and other accessories, as well as fragrances for men and women. Taking
 14 into account the entire distribution network, Ferragamo is present in over 90 countries all over
 15 the world with several retail stores in the United States, including one in Bellevue, Washington.
 16 Ferragamo works constantly to consolidate and increase over time the value of the brand and
 17 maintain high quality standards for the products and distribution processes through investments
 18 in research, product innovation, IT and business support.

19 4. Ferragamo owns, manages, enforces, licenses, and maintains intellectual
 20 property, including various trademarks. Relevant to this Complaint, Ferragamo owns the
 21 following registered trademarks ("Ferragamo Trademarks").

<u>Mark</u>	<u>Registration No. (International Classes)</u>
SALVATORE FERRAGAMO	1,016,032 (IC 010, 025, 026)

1 2 3 4 5 6 7		1,208,600 (IC 026)
8 9 10 11 12 13		1,609,161 (IC 025)
14 15 16 17 18 19		2,051,981 (IC 025)
20 21 22 23 24 25 26 27		4,514,247 (IC 018, 025)
		4,578,196 (IC 018, 025)
		6,127,042 (IC 025)

True and correct copies of the registration certificates for the Ferragamo Trademarks are attached as **Exhibit A**.

5. From February 2020 through November 2020, Defendants advertised, marketed, offered, and sold counterfeit Ferragamo products in the Amazon store, using Ferragamo's registered trademarks, without authorization, to deceive customers about the authenticity and origin of the products and the products' affiliation with Ferragamo.

Explore Litigation Insights

Docket Alarm provides insights to develop a more informed litigation strategy and the peace of mind of knowing you're on top of things.

Real-Time Litigation Alerts



Keep your litigation team up-to-date with **real-time alerts** and advanced team management tools built for the enterprise, all while greatly reducing PACER spend.

Our comprehensive service means we can handle Federal, State, and Administrative courts across the country.

Advanced Docket Research



With over 230 million records, Docket Alarm's cloud-native docket research platform finds what other services can't. Coverage includes Federal, State, plus PTAB, TTAB, ITC and NLRB decisions, all in one place.

Identify arguments that have been successful in the past with full text, pinpoint searching. Link to case law cited within any court document via Fastcase.

Analytics At Your Fingertips



Learn what happened the last time a particular judge, opposing counsel or company faced cases similar to yours.

Advanced out-of-the-box PTAB and TTAB analytics are always at your fingertips.

API

Docket Alarm offers a powerful API (application programming interface) to developers that want to integrate case filings into their apps.

LAW FIRMS

Build custom dashboards for your attorneys and clients with live data direct from the court.

Automate many repetitive legal tasks like conflict checks, document management, and marketing.

FINANCIAL INSTITUTIONS

Litigation and bankruptcy checks for companies and debtors.

E-DISCOVERY AND LEGAL VENDORS

Sync your system to PACER to automate legal marketing.