

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 16-cv-61752-Dimitrouleas/Snow

VENUS FASHION, INC.,

Plaintiff,

vs.

CHANGCHUN CHENGJI TECHNOLOGY  
CO., LTD.  
AUKEY INTERNATIONAL LIMITED, and  
AUKEY E-BUSINESS CO., LTD.,

Defendants.

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**Notice of Emails Received From Defendants and Defendant's Counsel**

Plaintiff Venus Fashion, Inc. hereby notifies the Court of emails received from certain defendants and Sophie Jiang of Ziliak Law, LLC, who indicated Ziliak Law, LLC represents Defendants although no attorney has made an appearance on behalf of Defendants. The emails received from Defendants, together with Plaintiff's counsel's reply thereto, are attached hereto as Composite Exhibit A.<sup>1</sup>

Dated: September 9, 2016

Respectfully submitted,

By: /s/ Peter A. Chiabotti

David Otero

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<sup>1</sup> The email correspondence is redacted to avoid disclosure of settlement communications under Fed. R. Evid. Rule 408.

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*Attorneys for Plaintiff Venus Fashion, Inc.*

**Certificate Of Service**

I hereby certify that on September 9, 2016, a true and correct copy of the foregoing was electronically filed with the Clerk of the Court by using the CM/ECF system and that a true and correct copy of the foregoing was served this September 9, 2016 by transmission of Notices of Electronic Filing generated by CM/ECF or via e-mail to all parties on the attached Service List. I also certify that a true copy of the foregoing was served on September 9, 2016 upon Defendants via electronic mail at the e-mail addresses [service@vessos.com](mailto:service@vessos.com), [digital.store072010@gmail.com](mailto:digital.store072010@gmail.com), [tongwenping@aukeys.com](mailto:tongwenping@aukeys.com), and [domain@aukeys.com](mailto:domain@aukeys.com), and by posting copies of the same at [www.venuscopyrighthenforcement.com/vessos/](http://www.venuscopyrighthenforcement.com/vessos/). I also certify also certify that a true copy of the foregoing was served on September 9, 2016 upon Sophie Jiang of Ziliak Law, LLC, who indicated Ziliak Law, LLC represents Defendants although no attorney has made an appearance on behalf of Defendants, via electronic mail at [sjiang@ziliak.com](mailto:sjiang@ziliak.com).

/s/Peter A. Chiabotti \_\_\_\_\_  
Peter A. Chiabotti

**Service List**

<p><b>Attorneys For Plaintiff</b> Allan Gabriel Dykema Gossett PLLC 333 South Grand Avenue, Suite 2100 Los Angeles, CA 90071 Telephone: 213-457-1800 Facsimile: 213-457-1850 <a href="mailto:agabriel@dykema.com">agabriel@dykema.com</a></p> <p>Aaron D. Charfoos Dykema Gossett PLLC 10 S. Wacker Drive, Suite 2300 Chicago, IL 60606 Telephone: (312) 876-1700 Facsimile: (312) 876-1155 <a href="mailto:acharfoos@dykema.com">acharfoos@dykema.com</a></p>	<p><b>Attorneys For Plaintiff</b> David Otero Florida Bar No. 651370 Akerman LLP 50 N. Laura Street, Suite 3100 Jacksonville, FL 32202 Telephone: (904) 798-3700 Facsimile: (904) 798-3730 <a href="mailto:david.otero@akerman.com">david.otero@akerman.com</a></p> <p>Peter A. Chiabotti Florida Bar No. 0602671 Akerman LLP 777 South Flagler Drive Suite 1100, West Tower West Palm Beach, FL 33401 Telephone: (561) 653-5000 Facsimile: (561) 659-6313 <a href="mailto:peter.chiabotti@akerman.com">peter.chiabotti@akerman.com</a></p>
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# Composite Exhibit A



[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

**We look forward to hearing from you.**

**Sophie**

On Tue, Aug 30, 2016 at 5:41 PM, Gabriel, Allan <[AGabriel@dykema.com](mailto:AGabriel@dykema.com)> wrote:

Ms. Jiang:

In response to your request in our call today, our client is not willing to consent to any extension of time for the defendants to submit their opposition to the pending preliminary injunction motion. Your clients have been aware of my client's claims of massive copyright infringement and chose to ignore all efforts and communications directed to resolving these issues prior to litigation. Further, the briefing schedules was set by court order and not the plaintiff.

[REDACTED]

Allan Gabriel

**From:** Gabriel, Allan  
**Sent:** Friday, August 26, 2016 11:26 AM



To: 'Sophie Jiang'

Cc: Charfoos, Aaron

Subject: RE: Venus Fashion, Inc. v. Changchun Chengji Technology Co., Ltd. et al.,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

We await your response.

Allan Gabriel

**From:** Sophie Jiang [<mailto:sjiang@ziliak.com>]  
**Sent:** Tuesday, August 23, 2016 2:04 PM  
**To:** Gabriel, Allan  
**Cc:** Charfoos, Aaron  
**Subject:** Re: Venus Fashion, Inc. v. Changchun Chengji Technology Co., Ltd. et al.,

Hi dear Allan and Aaron:

[REDACTED]

[REDACTED]

Best

Sophie

On Fri, Aug 19, 2016 at 3:41 PM, Sophie Jiang <[sjiang@ziliak.com](mailto:sjiang@ziliak.com)> wrote:

Hi Allan:

[REDACTED]

[REDACTED]

Thanks and best

Sophie

On Fri, Aug 19, 2016 at 3:09 PM, Gabriel, Allan <[AGabriel@dykema.com](mailto:AGabriel@dykema.com)> wrote:

Ms. Jiang:

Thank you for your email.

[REDACTED]

[REDACTED]

Allan

**From:** Sophie Jiang [mailto:[sjiang@ziliak.com](mailto:sjiang@ziliak.com)]  
**Sent:** Friday, August 19, 2016 11:11 AM  
**To:** Gabriel, Allan; Charfoos, Aaron  
**Subject:** RE: Venus Fashion, Inc. v. Changchun Chengji Technology Co., Ltd. et al.,

Dear Allan and Aaron:

We represent the defendants in the Venus Fashion case.

[REDACTED]

[REDACTED]

Thank you and we look forward to hearing from you.

Best and have a great weekend.

Sophie

Sophie Jiang | Of Counsel | Ziliak Law, LLC  
141 W. Jackson Blvd. Suite 4048 | Chicago, IL 60604  
Office: [312.281.6534](tel:312.281.6534)  
Email: [sjiang@ziliak.com](mailto:sjiang@ziliak.com)

**Chiabotti, Peter (Ptrn-WPB)**

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**From:** 童文平 <tongwenping@aukeys.com>  
**Sent:** Monday, August 15, 2016 12:22 PM  
**To:** disputes; Chiabotti, Peter (Ptrn-WPB)  
**Subject:** Re:Fw: Notice of Court-Ordered Suspension re: VESSOS.COM

Dear sir,

We've been noticed that our website vessos.com has been locked and disabled as the the case of copyright with venus.com. We can remove these pictures involved with venus.com from vessos.com immediately. Could you please unlock vessos.com?

Best regards,

Jason

----- Original -----

**From:** [disputes](#)  
**Date:** 2016-08-15 23:30  
**To:** [domain@aukeys.com](mailto:domain@aukeys.com)  
**Subject:** Notice of Court-Ordered Suspension re: VESSOS.COM  
Dear Huiyue Ze,

GoDaddy has been notified that per documents filed in the United States District Court Southern District Of Florida, for Venus Fashion, Inc. vs CHANGCHUN CHENGJI TECHNOLOGY CO., LTD. AUKEY INTERNATIONAL LIMITED, and AUKEY E-BUSINESS CO., LTD. 16-cv-61752-Dimitrouleas/Snow, the domain name VESSOS.COM is to be locked and disabled.

As such, we have locked and disabled VESSOS.COM.

If you have any questions regarding these actions or this court case, please contact the Court or Plaintiff's Counsel directly. Contact information for Plaintiff's Counsel can be found below:

Peter A. Chiabotti  
Akerman LLP  
777 South Flagler Drive  
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West Palm Beach, FL 33401  
Main: 561.653.5000  
Email: peter.chiabotti@akerman.com

Kindest Regards,

**Hap F.**  
Dispute Administrator | **GoDaddy**  
Claim: 1686537