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January 22, 2020

BY ECF

The Honorable Mark R. Hornak
Chief United States District Judge
United States District Court for the
Western District of Pennsylvania
700 Grant Street
Pittsburgh, Pennsylvania 15219

Re: *Doggie Dental Inc. v. Ahui, et al.*
Western District of Pennsylvania
Civil Action No. 19-cv-1627
(Our File No. 981.010)

Dear Judge Hornak:

We are counsel for Doggie Dental Inc. and Peter Dertsakyan, Plaintiffs in the above identified matter.

As a follow up to *Plaintiffs' Supplemental Authority Regarding Duration of Temporary Restraining Order* [Dkt. 39] filed yesterday, we are now writing to bring to the Court's attention several cases from the Southern District of Florida. This district has nearly one hundred (100) cases a year filed involving sellers on online marketplaces where the relief sought is similar to the relief sought in the present case before this Court.

In the six cases identified below, the duration of the Temporary Restraining Order against sellers on online marketplaces was extended to more than twenty-eight (28) days:

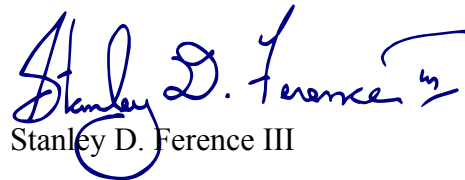
1. *Addidas AG v. 2CN0931*, No. 18-CV-60758-MGC (S.D. Fla.) (TRO in place for 48 days before preliminary injunction entered on June 4, 2018 at Dkt. 31);
2. *Chanel, Inc. v. 5Areplicachannel.com*, No. 18-CV-60778-JEM (S.D. Fla.) (TRO in place for 42 days before preliminary injunction entered on May 31, 2018 at Dkt. 37);
3. *North Face Apparel Corp. v. 4Usedtrailers.com*, No. 18-CV-61329-UU (S.D. Fla.) (TRO in place for 39 days before preliminary injunction entered on July 24, 2018 at Dkt. 41);

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4. *Gucci America, Inc. v. Bgaadb*, No. 18-CV-62227-UU (S.D. Fla.) (TRO in place for 33 days before preliminary injunction entered on October 23, 2018 at Dkt. No. 30);
5. *Mycoskie, LLC v. 1688BEST*, No. 19-CV-60925-KMM (S.D. Fla.) (TRO in place for 31 days before preliminary injunction entered on August 2, 2018 at Dkt. No. 38); and
6. *Apple Corps. Ltd. v. 3W Store*, No. 18-CV-60656-UU (S.D. Fla.) (TRO in place for 30 days before preliminary injunction entered on May 2, 2018 at Dkt. 46).

These cases show courts have not hesitated to exercise their authority to extend Temporary Restraining Orders beyond twenty-eight (28) days in cases like the one presently before this Court given the challenges involved in dealing with sellers on online marketplaces.

Respectfully submitted,



Stanley D. Ference III