

EXHIBIT 2
TO DECLARATION OF PAUL KOSSOF

From: [patrol](#)
To: [DAC Collections](#)
Cc: [IP Enforcement](#)
Subject: Re: [NEW TRO] Case 24-cv-5629 (FENDI)
Date: Sunday, January 12, 2025 7:52:13 PM

Hi team,

The data we provide is the sales data of the product within the first 30 days of the date we provide the data.

Regards,

[DHgate.com](#)

From: "DAC Collections"<collections@dacmlc.com>
Date: Fri, Jan 10, 2025, 22:36
Subject: RE: [NEW TRO] Case 24-cv-5629 (FENDI)
To: "patrol"<patrol@dhgate.com>
Cc: "IP Enforcement"<ipenforcement@merceroaklaw.com>

Hello,

Thank you for your response. To confirm, is it for the lifetime of the listing until 30 days before you provide it? In other words, is it all the sales up to then?

Best, DAC Collections Team

From: patrol <patrol@dhgate.com>
Sent: Friday, January 10, 2025 12:46 AM
To: DAC Collections <collections@dacmlc.com>
Cc: IP Enforcement <ipenforcement@merceroaklaw.com>
Subject: Re: [NEW TRO] Case 24-cv-5629 (FENDI)

Hi team,

The sales data we provide is 30 days before the date we provide it.

Regards,

[DHgate.com](#)

From: "DAC Collections" <collections@dacmlc.com>
Date: Wed, Jan 8, 2025, 02:41
Subject: RE: [NEW TRO] Case 24-cv-5629 (FENDI)
To: "patrol" <patrol@dhgate.com>
Cc: "IP Enforcement" <ipenforcement@merceroaklaw.com>

Hello,

Thank you again for the production.

The judge requested additional information regarding the sales numbers. Could you please clarify whether the provided figures are for the lifetime of the product or pertain to a specific period of time? If the latter, could you provide the date range for these numbers?

Kindly note we have a court-imposed deadline to meet.

Best regards, DAC Collections Team

From: patrol <patrol@dhgate.com>
Sent: Friday, October 18, 2024 5:30 AM
To: DAC Collections <collections@dacmlc.com>
Cc: IP Enforcement <ipenforcement@merceroaklaw.com>
Subject: Re: [NEW TRO] Case 24-cv-5629 (FENDI)

Dear Sir/Madam,

Thank you for your email.

We have frozen the accounts and please refer to the attachment for the information as requested. Please send us the preliminary injunction before the expiry date of the TRO, otherwise frozen funds will be released.

Feel free to contact us if you have any questions. We appreciate your cooperation and support.

Best regards,

DHgate.com

From: "DAC Collections" <collections@dacmlc.com>
Date: Wed, Oct 16, 2024, 22:24
Subject: [NEW TRO] Case 24-cv-5629 (FENDI)

To: "patrol"<patrol@dhgate.com>

Cc: "IP Enforcement"<ipenforcement@merceroaklaw.com>

PLEASE USE COLLECTIONS@DACMLLC.COM AS PLAINTIFF'S POINT OF CONTACT IN THIS CASE WHEN SENDING NOTIFICATIONS TO DEFENDANTS.

*** Please do not disclose this information to sellers because we will be contacting them directly.**

Please find enclosed an order issued by the court in the above referenced federal lawsuit and the corresponding complaint.

As indicated in the order, the court has ordered the seizure of the defendants' accounts within 10 business days. As such, kindly note that you must fulfill the order by October 29.

Please freeze the accounts as well as product listings and provide us with the frozen fund amounts, sales figures, and associated email addresses.

Please also advise the accounts currently frozen by other plaintiffs, as this significantly affects our case management strategy.

To assist with this matter, please find attached the attached Excel spreadsheet which includes the specific accounts and identifying information.

Kind regards,

Collections Team

DAC Management LLC

www.dacmlc.com

From: [patrol](#)
To: [DAC Collections](#)
Cc: [IP Enforcement](#)
Subject: Re: [NEW TRO] Case 24-cv-5629 (FENDI)
Date: Monday, October 21, 2024 4:25:43 AM
Attachments: [24-cv-05629-info-new.xlsx](#)

Hi Team,

Data was missing due to negligence. These sellers have all been frozen as required. The data has been added in the attachment.

Please see the attachment for sales data.

I apologize for the oversight.

Regards,

[DHgate.com](#)

From: "DAC Collections" <collections@dacmlc.com>
Date: Fri, Oct 18, 2024, 20:06
Subject: Re: [NEW TRO] Case 24-cv-5629 (FENDI)
To: "patrol" <patrol@dhgate.com>
Cc: "IP Enforcement" <ipenforcement@merceroaklaw.com>

Hello -

Defendants 4 through 18 have not been addressed. Kindly ensure these stores are frozen and update the Excel.

Also, per the Excel we shared and previous cases, please also input the sales data.

Kind regards,

DAC Collections Team

On Oct 18, 2024, at 5:34 AM, patrol <patrol@dhgate.com> wrote:

Dear Sir/Madam,

Thank you for your email.

We have frozen the accounts and please refer to the attachment for the information as

requested. Please send us the preliminary injunction before the expiry date of the TRO, otherwise frozen funds will be released.

Feel free to contact us if you have any questions. We appreciate your cooperation and support.

Best regards,

DHgate.com

From: "DAC Collections"<collections@dacmlc.com>
Date: Wed, Oct 16, 2024, 22:24
Subject: [NEW TRO] Case 24-cv-5629 (FENDI)
To: "patrol"<patrol@dhgate.com>
Cc: "IP Enforcement"<ipenforcement@merceroaklaw.com>

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To assist with this matter, please find attached the attached Excel spreadsheet which includes the specific accounts and identifying information.

Kind regards,

Collections Team

DAC Management LLC

www.dacmlc.com

FENDI 5629 - DHGate Defendants

Store Information

Def. #	Store Name	ASIN ID	Seller ID	Listing	FULL NAME	EMAIL	ACCOUNT BALANCE	sales data
4	shuigg1588 Store	8.09E+08	2.2E+07	https://www.dhgate.com/product/top-quality-genuine-leathe-shoulder-bags/808686378.html	陈美凤	2395266044@qq.com	44797.46	4682.87
5	Kynebag Store	8.76E+08	2.2E+07	https://www.dhgate.com/product/wide-shoulder-strap-for-bags-replacement/875600235.html	庄栩栩	zxkbkb@163.com	2133.73	321.27
6	overt0_share Store	7.49E+08	2.2E+07	https://www.dhgate.com/product/high-quality-designers-dress-shirt-mens-swear/748823413.html	潘晶晶	ph17177244617@163.com	257.54	38815.6606
7	cy_trend_shop Store	9.73E+08	2.2E+07	https://www.dhgate.com/product/fendishirt-italy-fen-men-designer-t-shirt/973007042.html	陈钰	764467344@qq.com	1.97	254.27
8	good_off_shop Store	9.73E+08	2.2E+07	https://www.dhgate.com/product/fendishirt-italy-fen-men-designer-t-shirt/973072503.html	张兴汶	584650360@qq.com	0	0
9	clover_a Store	7.53E+08	2.2E+07	https://www.dhgate.com/product/2022-mens-designers-t-shirt-fashion-men-s/753262749.html	陈小雄	616647908@qq.com	0	0
10	gucci20220407 Store	7.65E+08	2.2E+07	https://www.dhgate.com/product/2022ss-new-designer-womens-t-shirt-high-end/764631609.html	张丰	89204835@qq.com	280.17	110029.4504
11	cortez25 Store	9.76E+08	2.2E+07	https://www.dhgate.com/product/fendibags-womens-designer-bags-fendi-designer/975872199.html	李勇进	datang118866@163.com	1151.7	153467.3557
12	celinee_bags Store	9.31E+08	2.2E+07	https://www.dhgate.com/product/the-totes-handbag-designer-men-clutch-bag/930594412.html	刘志豪	z45455141@tom.com	1813.68	210.7
13	tsmir278 Store	8.13E+08	2.2E+07	https://www.dhgate.com/product/fashion-t-shirts-mens-women-designers-t-shirts/813173675.html	梁治民	1226394790@qq.com	0	354.3296
14	louise1 Store	9.18E+08	2.2E+07	https://www.dhgate.com/product/women-s-jackets-designer-23-autumn-winter/918045808.html	王聪志	uk2236565@126.com	0	32923.9556
15	min007 Store	9.54E+08	2.2E+07	https://www.dhgate.com/product/crossbody-baquette-designer-women-handbag/953754460.html	郑超敏	3647488233@qq.com	77.39	84.4412
16	fashion932 Store	8.01E+08	2.2E+07	https://www.dhgate.com/product/evening-bag-dumpling-bag-women-vintage-handbag/901193922.html	陈永来	enbfssxlu753@outlook.com	0	4120.4396
17	bagstore5566 Store	8.03E+08	2.2E+07	https://www.dhgate.com/product/bag-straw-baquette-evening-bags-women-handbags/802942260.html	陈永来	yruvwztoq289@outlook.com	62.48	67.6177
18	fashion8635 Store	8.03E+08	2.2E+07	https://www.dhgate.com/product/evening-bags-designer-wrist-bag-women-luxury/802502914.html	庄碧仁	jssowu799323@outlook.com	0	191.6756
19	fashion1788 Store	8.02E+08	2.2E+07	https://www.dhgate.com/product/evening-bags-armpil-shoulder-bag-handbags/802495103.html	陈永来	qmavpht94@outlook.com	0	76.0784
20	bag2939 Store	8.04E+08	2.2E+07	https://www.dhgate.com/product/evening-bags-branded-co-sunshine-handbag/803794895.html	陈永来	qiaqmi159680@outlook.com	0	69.0245
21	handbag_shop88 Store	9.49E+08	2.2E+07	https://www.dhgate.com/product/designer-bags-women-baguettes-tote-bag-fashion/949402540.html	陈永来	2951416082@qq.com	0	508.1799
22	handbag_shop588 Store	7.9E+08	2.2E+07	https://www.dhgate.com/product/designer-large-top-quality-genuine-leathe/790083644.html	陈军锋	2667161081@qq.com	0	858.3299
23	luxury_fashion68 Store	7.97E+08	2.2E+07	https://www.dhgate.com/product/designer-large-top-quality-genuine-leathe/796723541.html	杨清彬	2667161081@qq.com	107.29	435.6168
24	realmadrid966 Store	9.74E+08	2.2E+07	https://www.dhgate.com/product/designer-bags-women-baquette-luxury-tote/973618579.html	杨清彬	2667161081@qq.com	0	215.4036
25	pradahandbag Store	9.27E+08	2.2E+07	https://www.dhgate.com/product/designer-sunshine-bag-cross-body-beach-top/926887240.html	吴晓强	a17505944115@163.com	0	844.21
26	mingfengbag1686 Store	8.48E+08	2.2E+07	https://www.dhgate.com/product/high-quality-women-bags-handbags-ladies-kmz-1/847657038.html	彭海峰	z44545414@sina.com	1359.2	1.0209
27	modishmarket88 Store	9.83E+08	2.2E+07	https://www.dhgate.com/product/dhgate-designer-bag-mini-sling-hawksbill/983102121.html	申国生	t13167890072@163.com	23.15	13601.1553
28	marvellous66 Store	9.83E+08	2.2E+07	https://www.dhgate.com/product/10a-hawksbill-glass-handle-mini-shop-designer/983102835.html	刘志豪	18924026301@163.com	204.6	94.7427
29	lontime11 Store	9.83E+08	2.2E+07	https://www.dhgate.com/product/callskin-fashion-even-mini-tote-designer/983127090.html	刘志豪	18924026301@163.com	201.26	228.2039
30	cing9 Store	9.83E+08	2.2E+07	https://www.dhgate.com/product/2sizes-classic-flap-baquette-shoulder-bag/983092998.html	刘志豪	18924026301@163.com	201.69	160.2796
31	carmar Store	9.84E+08	2.2E+07	https://www.dhgate.com/product/classic-flap-baquette-bag-mirror-quality/984244064.html	彭海峰	15386045567@163.com	168.25	173.1136
32	a_handbag8 Store	9.66E+08	2.2E+07	https://www.dhgate.com/product/factory-online-export-designer-bags-tote/966383677.html	彭海峰	18684580110@163.com	164.6	213.0206
33	jsem_home Store	9.53E+08	2.2E+07	https://www.dhgate.com/product/charm-designer-new-fen-style-rhinestone-bracelet/924706267.html	辛星	17306660512@163.com	29.15	0
34	woman_glasses Store	9.25E+08	2.2E+07	https://www.dhgate.com/product/2024-large-capacity-tote-shopping-bag-sunshine/962475300.html	伍定桂	tokingsley@163.com	193.28	0
35	juyuan2023 Store	9.62E+08	2.2E+07	https://www.dhgate.com/product/womens-high-quality-designer-sunshine-roma/895081143.html	王聪志	m51588@126.com	0.01	970.19
36	nmixone Store	8.95E+08	2.2E+07	https://www.dhgate.com/product/designer-bag-womens-saddlebag-high-quality/980600551.html	李云瑞	jiuquanht648@163.com	27.53	1152.2535
37	lady5 bag Store	9.81E+08	2.2E+07	https://www.dhgate.com/product/74-off-high-quality-new-women-s-hand-larger/756575670.html	彭海峰	707549332@qq.com	492.06	506.2018
38	goldencamebag Store	7.57E+08	2.2E+07	https://www.dhgate.com/product/discounters-hand-large-single-shoulder-bag/782760579.html	郑丽珠	teslooth52@21cn.com	7804.69	2739.26
39	shienstoresun Store	7.83E+08	2.2E+07	https://www.dhgate.com/product/summer-new-fashion-women-s-bag-designer-women/774391153.html	董继宏	goldencamebag@163.com	4645.43	0
40	High quality luxurybags Sto	7.74E+08	2.2E+07	https://www.dhgate.com/product/wholesale-online-2022-new-women-s-hand-larger/756651353.html	董立兴	mvdfv05@163.com	0	1363.5614
41	Discountbags Store	7.56E+08	2.2E+07	https://www.dhgate.com/product/luxury-leather-designer-brand-women-s-bag/968640688.html	程正亮	448408018@qq.com	-33.1	115.47
42	Luxury brand bag store 88	9.69E+08	2.2E+07	https://www.dhgate.com/product/handbag-explorative-models-handbags-version/829450334.html	董慧萍	renzhenxilie1001@163.com	0	0
43	bagsonline5 Store	8.29E+08	2.2E+07	https://www.dhgate.com/product/handbag-explorative-models-handbags-version/829450334.html	董继宏	bagsonline@163.com	0	1035.7327
44	womensbags4 Store	7.86E+08	2.2E+07	https://www.dhgate.com/product/62-off-2022-new-women-s-bags-can-be-customized/786183813.html	董建业	womensbags4@163.com	0	359
							\$66,165.21	\$383,458.11