

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

LACOSTE ALLIGATOR S.A.,

Plaintiff

Vs.

SUGAR SHACK, INC.; PITO NEW YORK
STYLE; AZ DISTRIBUTORS; HERLAN
GONZALEZ; LINCOLN FANTASY;
ARNALDO ROSADO VILLANUEVA; EL
VIAJE DISTRIBUTORS D/B/A
CHULERIASBY EL VIAJE; RADAMES
TIRADO; INTERNATIONAL
WHOLESALE; FELIX ACOSTA; MONTIS
RETAIL WHOLESALE; DIONISIO IMPORTS;
DIONISIO ACOSTA; MARY & JOE'S
FANTASY; JOSE M. GARCIA; LAC
IMPORTS; LUIS CORTES; RAUL
ALEJANDRO; AMABEL SOTO; SUPER
DESCUENTOS; ROLANDO RODRIGUEZ;
ANDREA'S LEATHER SHOP; EDGAR
TORRES; PERFUMERIA J.D.; JOSE DAVID
RAMIREZ; RAFAEL VELEZ; JOSE LUIS
MATOS; JUAN DE DIOS; MARIA JUDITH
FRANCO; BOUBOW SOW; SUSANA
BORONA; MARIO FERNANDEZ; RAYMOND
MONTAÑEZ SANTANA; EL TOQUE DE
CACHE; ARNALDO FIGUEROA; FRANK
TOLEDO; HECTOR TOLEDO; AILUS CORP;
RODOLFO SULIA; ATELIER DE LA MODA;
GILBERTO COLON; JOSE TORT; EDGAR
TORRES; JOHN and JANE DOES 1-50; XYZ
CORPORATIONS 1-50

Defendants

CIVIL NO. 04-2367
(SEC)

FOR:
Infringement of Registered
Trademarks and Trademark
Counterfeiting
False Designation of Origin
Unfair Competition
Injunctive Relief
Damages

**MOTION TO ATTACH/GARNISH DEFENDANT ROLANDO RODRÍGUEZ'S
ASSETS**

TO THE HONORABLE COURT:

Now comes Plaintiff, Lacoste Alligator S.A. (“Plaintiff” or “Lacoste”), by its undersigned attorneys and respectfully state and pray as follow:

1. On July 31, 2006 the Court entered Judgment against Mr. Rolando Rodríguez d/b/a Super Descuento and/or Teresa Fashion, among other defendants [Docket No. 157].

2. The judgment is now firm and final and provides that defendant Rodríguez is to pay Lacoste damages for the amount of \$20,000.00 plus \$250.00 in costs and \$500.00 in attorney’s fees.

3. Moreover, Lacoste is entitled to post-judgment interests.

4. As of the date hereof, defendant Rodríguez has failed to comply with the Judgment and is therefore in clear violation of its terms.

5. Lacoste wishes to enforce and to secure recovery of the amount awarded by the Judgment and to that effect wishes to attach and/or garnish any available assets in the name of, or owned by, defendant Rodríguez and tenders herewith – for the Court’s approval - a form of Order of Attachment/Garnishment and Writ of Attachment/Garnishment.

6. As additional support, Lacoste submits the declaration of Vicente A. Sequeda Torres, one of Lacoste’s counsels, attesting to the fact that defendant Rodríguez has failed to pay the moneys awarded to Lacoste.

7. Finally, Lacoste moves for the appointment of Mr. José Marrero as Custodian of any assets that are seized.

PRAYER

WHEREFORE Lacoste prays for an order with the following provisions: i) ordering the U.S. Marshal to attach/garnish any of defendant's assets; ii) grant post-judgment interests; iii) appoint Mr. José Marrero as Custodian of any assets that are seized.

I HEREBY CERTIFY that on this same date a copy of this document has been sent by electronic mail to: Ignacio Rivera Cordero, Esq. (riveracordero@microjuris.com) (radiorebeldepr@hotmail.com) and I hereby certify that I have mailed by United States Postal Service the document to the following non CM/ECF participants: Herlán González (AZ Distributors), Ave. Campo Rico A-20, Urb. Country Club, Carolina, Puerto Rico 00936; Arnaldo Rosado Villanueva, Highway 864 #271, Hato Tejas, Bayamón, Puerto Rico; Radamés Tirado (El Viaje Distributors d/b/a Chuleria by El Viaje, Calle Post #12 Sur, Mayagüez, Puerto Rico 00681; Félix Acosta (International Wholesales), Road #2 KM 118, Bo. Ceiba Baja, Aguadilla, Puerto Rico 00603; Dionisio Acosta (Dionisio Imports), Calle Villa Los Gracia #8, Urb. Río Hondo, Mayagüez, Puerto Rico 00681; Rolando Rodríguez (Super Descuentos), Calle Arzuaga #71, Río Piedras, Puerto Rico 00923; José David Ramírez (Perfumería J.D.), Calle Victoria #48, San Germán, Puerto Rico 00683; Mario Fernández, Urb. Lomas Verdes, U-4 Acacia Street, Bayamón, PR 00956 Arnaldo Figueroa (El Toque de Cache); Hector Toledo (Frank Toledo), Calle Dr. Veve, Mini Mall Pasillo, Bayamón, Puerto Rico 00960; Raymond Montañez Santana, Calle 12 #BB-28, Urb. Sierra Linda, Bayamón, Puerto Rico 00960; Rodolfo Sulia (Ailus Corp), Calle 201 #JGJ-23, Urb. Country Club, Carolina, Puerto Rico 00936; Gilberto Colón (Atelier de la Moda), Paseo Duque 1037, Levittown, Toa Baja, Puerto Rico 00949,; José Tort Cintrón, Calle Arboleda #27, Urb. Valle Verde, Ponce, Puerto Rico

00733; Edgar Torres Colón, Urb. Borinquen, Calle Trinidad #EE-6, Cabo Rojo, Puerto Rico 00623 and Edgar Torres Rosario d/b/a Andrea's Leather Shop, Urb. Paseo Real, Calle Reina Ana B-14, Coamo, Puerto Rico.

RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this 12th day of March, 2007.

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