

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

MAPLEBEAR INC. DBA INSTACART, a  
Delaware corporation,

Plaintiff,

v.

JOHN DOES 1-2, CONTROLLING AND  
OPERATING A MALICIOUS  
APPLICATION KNOWN AS SHOPPER  
HELPER,

Defendants.

Civil Action No: 1:21-cv-00474

**MAPLEBEAR, INC. D/B/A INSTACART’S *EX PARTE* APPLICATION FOR AN  
EMERGENCY TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW  
CAUSE RE PRELIMINARY INJUNCTION**

Plaintiff Maplebear Inc., d/b/a Instacart (“Instacart”), by counsel, pursuant to Federal Rule of Civil Procedure 65(b) and (c), the Computer Fraud and Abuse Act (18 U.S.C. § 1030), the Lanham Act (15 U.S.C. §§ 1114, 1116 & 1125), the common law, and the All Writs Act (28 U.S.C. § 1651), respectfully moves the Court for an emergency *ex parte* temporary restraining order and an order to show cause why a preliminary injunction should not issue.

As discussed in Instacart’s brief in support of this Application, Instacart requests an order disabling an IP address, a number of Internet domains (*i.e.*, websites), and an account with an e-commerce platform through which John Does 1-2 (“Defendants”) host a mobile application available on Apple (iOS) devices known as Shopper Helper that is designed to communicate with and access Instacart’s servers to obtain batch information without authorization. Defendants further cause substantial harm by reproducing Instacart’s trademarks without authorization to

confuse Instacart's legitimate users and the public as to the source of the Shopper Helper application and corresponding illicit infrastructure. Shopper Helper is an unauthorized third-party mobile application that runs on top of Instacart's legitimate Shopper App. Once Shopper Helper is installed on a user's mobile device, it compromises the underlying code of Instacart's Shopper App through the creation and operation of a counterfeit, adulterated version of the Shopper App. However, the compromised Shopper App does not appear any different to the user on the mobile device. Anyone viewing the Shopper Helper app, thus, would think that Shopper Helper is developed and distributed by Instacart, despite the fact that it is the operators of Shopper Helper that are compromising the Instacart Shopper App.

The requested relief is necessary to forego the continued irreparable injury to Instacart. As discussed in Instacart's brief in support of this Application, *ex parte* relief is essential because if Defendants are given prior notice, they will be able to destroy, move, conceal, or otherwise make inaccessible the facilities through which Defendants host and make available to the public the malicious Shopper Helper application, and thus will significantly impede, if not preclude, Instacart's ability to obtain effective relief against Defendants to protect its registered trademarks and protected computer systems. That is because Defendants are sophisticated actors that are capable of quickly adapting the infrastructure that makes their malicious Shopper Helper app available and creating new versions of the Shopper Helper. Indeed, through Instacart's investigation, Defendants recently stated on certain messaging applications that they are developing a new version of Shopper Helper that would be available to Android-devices for the first time, which would cause further dissemination of the malicious and counterfeit mobile application, thereby harming Instacart, its Shoppers, and the public. Thus, they are capable, motivated, and likely to adapt their infrastructure if given prior notice.

Instacart's Application is based on: this Application; Instacart's Brief In Support Of This

Application; the Declarations of Dylan Tonti, Henry Levin, Adam Gayde, and Kayvan Ghaffari in support of Instacart's Application; the pleadings on file in this action; and on such argument and evidence as may be presented at the hearing on this Application.

Instacart further respectfully requests oral argument on this motion to be set for April 19, 2021, or as soon thereafter as the Court deems possible.

Dated: April 16, 2021

Respectfully submitted,

/s/ Julia R. Milewski

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Julia R. Milewski (VA Bar No. 82426)  
CROWELL & MORING LLP  
1001 Pennsylvania Avenue NW  
Washington DC 20004-2595  
Telephone: (202) 624-2500  
Fax: (202) 628-5116  
jmilewski@crowell.com

Gabriel M. Ramsey (*pro hac vice* pending)  
Warrington S. Parker III (*pro hac vice* pending)  
Kayvan M. Ghaffari (*pro hac vice* pending)  
Diane Aguirre-Dominguez (*pro hac vice* pending)  
CROWELL & MORING LLP  
3 Embarcadero Center, 26th Floor  
San Francisco, CA 94111  
Telephone: (415) 986-2800  
Fax: (415) 986-2827  
gramsey@crowell.com  
wparker@crowell.com  
kghaffari@crowell.com  
daguirre-dominguez@crowell.com

*Attorneys for Plaintiff Mapbear Inc., d/b/a  
Instacart*



and conclusions of law:

1. This Court has jurisdiction over the subject matter of this case, and there is good cause to believe that it will have jurisdiction over all parties hereto; the Complaint states a claim upon which relief may be granted against Defendants John Doe 1-2 (“Defendants”) under the Computer Fraud and Abuse Act (18 U.S.C. § 1030), the Lanham Act (15 U.S.C. §§ 1114, 1125), common law of trespass to chattels, unjust enrichment and conversion, and intentional interference with contractual relationships.

2. There is good cause to believe that Defendants have engaged in and are likely to engage in acts or practices that violate the Computer Fraud and Abuse Act (18 U.S.C. § 1030), the Lanham Act (15 U.S.C. §§ 1114, 1125), and constitute trespass to chattels, unjust enrichment, conversion, and intentional interference with contractual relations, and that Instacart is, therefore, likely to prevail on the merits of this action.

3. Instacart owns the registered trademarks Instacart, Instacart’s carrot logo, and other trademarks used in connection with its services, software and products. There is good cause to believe that, unless Defendants are restrained and enjoined by Order of this Court, immediate and irreparable harm will result from the Defendants’ ongoing violations of the Lanham Act.

4. The evidence set forth in Instacart’s Brief in Support of *Ex Parte* Application for a Temporary Restraining Order and Order to Show Cause Re Preliminary Injunction (“TRO Application”), and the accompanying declarations and exhibits, demonstrates that Instacart is likely to prevail on its claim that Defendants have engaged in violations of the foregoing law by:

- a. intentionally accessing proprietary code, authentication tokens and order batch data residing in protected computers and computer networks of Instacart, without authorization or exceeding authorization;
- b. deploying Internet domains, IP addresses and e-commerce facilities to

establish an infrastructure by which means Defendants conduct illegal activities, including unauthorized access to computers and networks, creating a counterfeit Instacart application, and unauthorized access to proprietary code, authentication tokens and order batch data; and

- c. creating a counterfeit Instacart application that reproduces Instacart's trademarks.

5. There is good cause to believe that if such conduct continues, irreparable harm will occur to Instacart, Instacart's Shoppers, and the public. There is good cause to believe that the Defendants will continue to engage in such unlawful actions if not immediately restrained from doing so by Order of this Court.

6. There is good cause to believe that immediate and irreparable damage to this Court's ability to grant effective final relief will result from the continued operation, sale, transfer, or other disposition or concealment by Defendants of the counterfeit software at issue, related software distribution facilities and related discoverable evidence of Defendants misconduct that are hosted at, operate through or otherwise available through the Internet domains, the IP address and an account with an e-commerce platform identified in **Appendix A**, if Defendants receive advance notice of this action. Based on the evidence cited in Instacart's TRO Application and accompanying declarations and exhibits, Instacart is likely to be able to prove that:

- a. Defendants are engaged in activities that directly violate United States law and harm Instacart, Instacart's Shoppers, and the public;
- b. Defendants have continued their unlawful conduct despite the clear injury to the foregoing interests;
- c. Defendants are likely to continue their unlawful conduct and are likely to delete or to relocate the counterfeit software at issue, related software distribution facilities and related discoverable evidence disseminated through or available at the Internet domains, IP address and e-commerce account listed in **Appendix A**, thereby permitting them to continue their illegal acts; and
- d. Defendants are likely to warn their associates engaged in such activities if

informed of Instacart's action.

7. Instacart's request for this emergency *ex parte* relief is not the result of any lack of diligence on Instacart's part, but instead based upon the nature of Defendants' unlawful conduct. Therefore, in accordance with Fed. R. Civ. P. 65(b), 15 U.S.C. § 1116(a) and 28 U.S.C. § 1651(a), good cause and the interest of justice require that this Order be Granted without prior notice to Defendants, and accordingly, Instacart is relieved of the duty to provide Defendants with prior notice of Instacart's motion.

8. There is good cause to believe that Defendants have specifically directed their activities to Instacart's servers located in Virginia and the Eastern District of Virginia. There is further good cause to believe that Defendants have engaged in illegal activity using the infrastructure identified in **Appendix A** to host software that deceives Instacart's Shoppers and the public into believing the unauthorized software is sanctioned or associated with Instacart, in order to perpetuate Defendants' illegal activities. There is good cause to believe that Defendants have directed said unauthorized application and content through certain instrumentalities – specifically the domains, the domain registration facilities of the domain registries, the IP address, the hosting providers of the IP addresses, the e-commerce account, and the e-commerce platform provider identified in **Appendix A**.

9. There is good cause to believe that Defendants have engaged in illegal activity by using the domain registration facilities of the domain registries identified in **Appendix A** to register the Internet domains identified in **Appendix A**, the Internet hosting facility of the IP address identified in **Appendix A**, and an account with an e-commerce platform identified in **Appendix A** so as to deceive Instacart's Shoppers to misuse authentication tokens for their Shopper accounts, and to deliver from those domains, IP address and e-commerce account the code and application that Defendants use to access Instacart's infrastructure to obtain order

batch data without authorization.

10. There is good cause to believe that Defendants have engaged in illegal activity by using deceptive and fraudulent methods to obtain computer users' authentication tokens and to use such credentials for illegal purposes.

11. There is good cause to believe that to immediately halt the injury caused by Defendants, Defendants must be prohibited from accessing Instacart's infrastructure without authorization from the Internet domains, IP address and e-commerce account identified in **Appendix A** to the computers of Instacart's servers or Instacart's Shoppers.

12. There is good cause to believe that Defendants have engaged in illegal activity using the Internet domains, IP addresses, and an account with an e-commerce platform identified in **Appendix A** to host the malicious content used to access without authorization Instacart's servers to obtain batch data. There is good cause to believe that to immediately halt the injury caused by Defendants, each of Defendants' domains set forth in **Appendix A** must be immediately transferred beyond the control of Defendants, that Defendants be denied access to the IP address identified in **Appendix A**, and that Defendants be denied access to an account with an e-commerce platform identified in **Appendix A** thus making them inaccessible to Defendants.

13. There is good cause to believe that to immediately halt the injury, the execution of this Order should be carried out in a coordinated manner by Instacart and by the domain registries identified in **Appendix A**, the Internet hosting company identified in **Appendix A**, and the e-commerce platform identified in **Appendix A**, on such date and time within five (5) days of this Order as may be reasonably requested by Instacart.

14. There is good cause to permit notice of the instant Order, notice of the Preliminary Injunction hearing and service of the Complaint by formal and alternative means, given the exigency of the circumstances and the need for prompt relief. The following means of service are authorized by law, satisfy Due Process, and satisfy Fed. R. Civ. P. 4(f)(3) and are reasonably calculated to notify Defendants of the instant order, the Preliminary Injunction hearing and of this action: (1) transmission by email, facsimile, mail and/or personal delivery to the contact information provided by Defendants to Defendants' domain registrars, hosting companies and e-commerce platform and as agreed to by Defendants in Defendants' domain registration, hosting or e-commerce platform agreements, (2) publishing notice on a publicly available Internet website, (3) by personal delivery upon Defendants, to the extent Defendants provided accurate contact information in the U.S.; and (4) personal delivery through the Hague Convention on Service Abroad or similar treaties upon Defendants, to the extent Defendants provided accurate contact information in foreign countries that are signatories to such treaties.

**TEMPORARY RESTRAINING ORDER AND ORDER TO SHOW CAUSE**

**IT IS THEREFORE ORDERED** that, Defendants, Defendants' representatives, and any other persons who are in active concert or participation with Defendants, are temporarily restrained and enjoined from: (1) intentionally accessing and sending any communication to Instacart and the protected computers of Instacart and its Shoppers, without authorization; (2) sending unauthorized software designed to create a counterfeit Instacart application; (3) configuring, deploying, operating, or otherwise participating in or facilitating infrastructure described in the TRO Application, including but not limited to the software hosted at and operating through the Internet domains set forth in **Appendix A**, the IP address identified in **Appendix A**, and an account with an e-commerce platform identified in **Appendix A**, and

through any other component or element of the Defendants' illegal infrastructure at any location; (4) misappropriating that which rightfully belongs to Instacart or in which Instacart or its Shoppers have a proprietary interest; (5) undertaking any similar activity that inflicts harm on Instacart, Instacart's Shoppers, or the public.

**IT IS FURTHER ORDERED** that, Defendants, Defendants' representatives, and any other persons who are in active concert or participation with Defendants are temporarily restrained and enjoined from (1) using and infringing Instacart's trademarks, including specifically Instacart's registered trademarks Instacart, Instacart's corporate logo, and/or other trademarks, trade names, service marks, or Internet Domain addresses or names containing or infringing such trademarks, trade names or service marks; (2) using in connection with Defendants' activities, products, or services any false or deceptive designation, representation or description of Defendants or of their activities, whether by symbols, words, designs or statements, which would damage or injure Instacart or give Defendants an unfair competitive advantage or result in deception of Instacart's Shoppers, customers or the public; or (3) acting in any other manner which suggests in any way that Defendants' activities, products or services come from or are somehow sponsored by or affiliated with Instacart, or passing off Defendants' activities, products or services as Instacart's.

**IT IS FURTHER ORDERED** that, with respect to any currently registered Internet domains set forth in **Appendix A** to this Order, the domain registries located in the United States shall take the following actions:

A. Within five (5) business days of receipt of this Order, shall unlock and change the registrar of record for the domains to CSC Corporate Domains, Inc. or such other registrar specified by Instacart. To the extent the registrar of record does not assist in changing

the registrar of record for the domains under its control, the domain registry for the domains, or its administrators, including backend registry operators or administrators, within five (5) business days of receipt of this Order, shall change, or assist in changing, the registrar of record for the domains to CSC Corporate Domains, Inc. or such other registrar specified by Instacart. The purpose of this paragraph is to ensure that Instacart has control over the hosting and administration of the domains in its registrar account at CSC Corporate Domains, Inc. or such other registrar specified by Instacart. Instacart shall provide to the domain registry or registrar of record any requested registrar information or account details necessary to effectuate the foregoing;

B. The WHOIS registrant, administrative, billing and technical contact and identifying information should be the following, or other information as may be specified by Instacart:

Domain Administrator  
Maplebear, Inc.  
50 Beale St., Suite 600  
San Francisco, CA 94105  
Phone: +1.910.817.2278  
Email: domains-contact@instacart.com

C. Prevent transfer, modification or deletion of the domain by Defendants and prevent transfer or control of the domain to the account of any party other than Instacart;

D. Take all steps required to propagate to the foregoing changes through the Domain Name System (“DNS”), including domain registrars.

**IT IS FURTHER ORDERED** that, with respect to the IP address listed in **Appendix A**, the Internet hosting provider located in the United States and listed at Appendix A shall:

A. Not enable, and shall take all reasonable steps to prevent, any circumvention of this order by Defendants or Defendants’ representatives associated with the IP address or any

other person;

B. Within five (5) business days of receipt of this Order, shall disable and deny to Defendants and Defendants' representatives, access to any and all systems, "backup" systems, arrangements or services that might otherwise be used to support the Defendants' malicious activities on or through the IP address set forth in **Appendix A** or that might otherwise be used to circumvent this Order;

C. Log all attempts to connect to or communicate with the IP address set forth in **Appendix A**;

D. Preserve, retain and produce to Instacart all documents and information sufficient to identify and contact Defendants and Defendants' representatives operating or controlling the IP address set forth in **Appendix A**, including any and all individual or entity names, mailing addresses, e-mail addresses, facsimile numbers and telephone numbers or similar contact information, including but not limited to such contact information reflected in billing, usage, access and contact records and all records, documents and logs associated with Defendants' or Defendants' representatives' use of or access to the IP address.

E. Completely refrain from providing any notice or warning to, or communicating in any way with Defendants or Defendants' representatives and shall refrain from publicizing this Order;

F. Provide reasonable assistance in implementing the terms of this Order and take no action to frustrate the implementation of this Order.

**IT IS FURTHER ORDERED** that, with respect to the account with an e-commerce platform listed in Appendix A, the e-commerce platform provider located in the United States and listed at Appendix A shall:

A. Not enable, and shall take all reasonable steps to prevent, any circumvention of this order by Defendants or Defendants' representatives associated with the account;

B. Within five (5) business days of receipt of this Order, shall disable and deny to Defendants and Defendants' representatives, access to any and all accounts, including without limitation any services of Defendants that might otherwise be used to support the Defendants account set forth in **Appendix A** or that might otherwise be used to circumvent this Order;

C. Log all attempts to connect to or communicate with the e-commerce account set forth in **Appendix A**;

D. Preserve, retain and produce to Instacart all documents and information sufficient to identify and contact Defendants and Defendants' representatives operating or controlling the e-commerce account set forth in **Appendix A**, including any and all individual or entity names, mailing addresses, e-mail addresses, facsimile numbers and telephone numbers or similar contact information, including but not limited to such contact information reflected in billing, usage, access and contact records and all records, documents and logs associated with Defendants' or Defendants' representatives' use of or access to the e-commerce account;

E. Completely refrain from providing any notice or warning to, or communicating in any way with Defendants or Defendants' representatives and shall refrain from publicizing this Order;

F. Provide reasonable assistance in implementing the terms of this Order and take no action to frustrate the implementation of this Order.

**IT IS FURTHER ORDERED** that copies of this Order, notice of the Preliminary Injunction hearing and service of the Complaint may be served by any means authorized by law, including (1) transmission by email, facsimile, mail and/or personal delivery to the contact

information provided by Defendants to Defendants' domain registrars, hosting companies and e-commerce platform and as agreed to by Defendants in the domain registration, hosting or e-commerce platform agreements, (2) publishing notice on a publicly available Internet website, (3) by personal delivery upon Defendants, to the extent Defendants provided accurate contact information in the U.S.; and (4) personal delivery through the Hague Convention on Service Abroad or similar treaties upon Defendants, to the extent Defendants provided accurate contact information in foreign countries that are signatories to such treaties.

**IT IS FURTHER ORDERED**, pursuant to Federal Rule of Civil Procedure 65(b) that the Defendants shall appear before this Court on \_\_\_\_\_ at \_\_\_\_\_ to show cause, if there is any, why this Court should not enter a Preliminary Injunction, pending final ruling on the Complaint against Defendants, enjoining Defendants from the conduct temporarily restrained by the preceding provisions of this Order.

**IT IS FURTHER ORDERED** that Instacart shall post bond in the amount of \$10,000 to be paid into the Court registry.

**IT IS FURTHER ORDERED** that Defendants shall file with the Court and serve on Instacart's counsel any answering affidavits, pleadings, motions, expert reports or declarations and/or legal memoranda no later than one (1) day prior to the hearing on Instacart's request for a preliminary injunction.

**IT IS SO ORDERED**

Entered this \_\_\_\_ day of April, 2021

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

# **Appendix A**

**APPENDIX A**

**.COM DOMAINS**

**Registry**

**VeriSign, Inc.  
VeriSign Information Services, Inc.  
12061 Bluemont Way  
Reston Virginia 20190  
United States**

<p>SHOPPER-HELPER.COM</p>	<p>Domain Name: SHOPPER-HELPER.COM                      Registry Domain ID: 2567501652_DOMAIN_COM-VRSN                      Registrar WHOIS Server: whois.dnspod.com                      Registrar URL: https://www.dnspod.com                      Updated Date: 2020-11-20 17:06:24                      Creation Date: 2020-10-22 15:06:23                      Registry Expiry Date: 2021-10-22 15:06:23                      Registrar: DNSPod, Inc.                      Registrar IANA ID: 1697                      Registrar Abuse Contact Email: <a href="mailto:abuse@dnspod.com">abuse@dnspod.com</a>                      Registrar Abuse Contact Phone: +86.95716                      Domain Status: ok https://www.icann.org/epp#ok                      Registry Registrant ID: REDACTED FOR PRIVACY                      Registrant Name: REDACTED FOR PRIVACY                      Registrant Organization: REDACTED FOR PRIVACY                      Registrant Street: REDACTED FOR PRIVACY                      Registrant City: REDACTED FOR PRIVACY                      Registrant State/Province: an hui sheng                      Registrant Postal Code: REDACTED FOR PRIVACY                      Registrant Country: CN                      Registrant Phone: REDACTED FOR PRIVACY                      Registrant Phone Ext: REDACTED FOR PRIVACY                      Registrant Fax: REDACTED FOR PRIVACY                      Registrant Fax Ext: REDACTED FOR PRIVACY                      Registrant Email: Select Contact Domain Holder link at                      https://whois.cloud.tencent.com/domain?domain=SHOPPER-HELPER.COM                      Registry Admin ID: REDACTED FOR PRIVACY                      Admin Name: REDACTED FOR PRIVACY                      Admin Organization: REDACTED FOR PRIVACY                      Admin Street: REDACTED FOR PRIVACY                      Admin City: REDACTED FOR PRIVACY                      Admin State/Province: REDACTED FOR PRIVACY                      Admin Postal Code: REDACTED FOR PRIVACY                      Admin Country: REDACTED FOR PRIVACY                      Admin Phone: REDACTED FOR PRIVACY                      Admin Phone Ext: REDACTED FOR PRIVACY</p>
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Admin Fax: REDACTED FOR PRIVACY  
Admin Fax Ext: REDACTED FOR PRIVACY  
Admin Email: Select Contact Domain Holder link at <https://whois.cloud.tencent.com/domain?domain=SHOPPER-HELPER.COM>  
Registry Tech ID: REDACTED FOR PRIVACY  
Tech Name: REDACTED FOR PRIVACY  
Tech Organization: REDACTED FOR PRIVACY  
Tech Street: REDACTED FOR PRIVACY  
Tech State/Province: REDACTED FOR PRIVACY  
Tech Postal Code: REDACTED FOR PRIVACY  
Tech Country: REDACTED FOR PRIVACY  
Tech Phone: REDACTED FOR PRIVACY  
Tech Phone Ext: REDACTED FOR PRIVACY  
Tech Fax: REDACTED FOR PRIVACY  
Tech Fax Ext: REDACTED FOR PRIVACY  
Tech Email: Select Contact Domain Holder link at <https://whois.cloud.tencent.com/domain?domain=SHOPPER-HELPER.COM>  
Registry Billing ID: REDACTED FOR PRIVACY  
Billing Name: REDACTED FOR PRIVACY  
Billing Organization: REDACTED FOR PRIVACY  
Billing Street: REDACTED FOR PRIVACY  
Billing City: REDACTED FOR PRIVACY  
Billing State/Province: REDACTED FOR PRIVACY  
Billing Postal Code: REDACTED FOR PRIVACY  
Billing Country: REDACTED FOR PRIVACY  
Billing Phone: REDACTED FOR PRIVACY  
Billing Email: Select Contact Domain Holder link at <https://whois.cloud.tencent.com/domain?domain=SHOPPER-HELPER.COM>  
Name Server:ns2.bodis.com  
Name Server:ns1.bodis.com  
DNSSEC: unsigned

**.VIP DOMAINS**

**Registry**

**Minds + Machines Group Limited  
2505 Second Avenue, Suite 520  
Seattle, WA 98121  
United States**

**Minds and Machines, LLC  
3100 Donald Douglas Loop North Hanger 7  
Santa Monica, CA 90405  
United States**

SHOPPERHELPER.VIP	<p>Domain Name: SHOPPERHELPER.VIP  Registry Domain ID:  D_01ADA82A_AAFDA6F8ED534EA5B4CFB7C99F2C2F  E1_0000017265CF37E4-VIP  Registrar WHOIS Server: whois.godaddy.com  Registrar URL: http://www.goaustraliadomains.com  Updated Date: 2020-05-30T06:39:42Z  Creation Date: 2020-05-30T13:39:38Z  Registrar Registration Expiration Date: 2021-05-30T13:39:38Z  Registrar: Go Australia Domains, LLC  Registrar IANA ID: 1151  Registrar Abuse Contact Email: abuse@godaddy.com  Registrar Abuse Contact Phone: +1.4806242505  Domain Status: clientTransferProhibited  <a href="http://www.icann.org/epp#clientTransferProhibited">http://www.icann.org/epp#clientTransferProhibited</a>  Domain Status: clientUpdateProhibited  <a href="http://www.icann.org/epp#clientUpdateProhibited">http://www.icann.org/epp#clientUpdateProhibited</a>  Domain Status: clientRenewProhibited  <a href="http://www.icann.org/epp#clientRenewProhibited">http://www.icann.org/epp#clientRenewProhibited</a>  Domain Status: clientDeleteProhibited  <a href="http://www.icann.org/epp#clientDeleteProhibited">http://www.icann.org/epp#clientDeleteProhibited</a>  Registry Registrant ID: CR426069585  Registrant Name: Registration Private  Registrant Organization: Domains By Proxy, LLC  Registrant Street: DomainsByProxy.com  Registrant Street: 14455 N. Hayden Road  Registrant City: Scottsdale  Registrant State/Province: Arizona  Registrant Postal Code: 85260  Registrant Country: US  Registrant Phone: +1.4806242599  Registrant Phone Ext:  Registrant Fax: +1.4806242598  Registrant Fax Ext:  Registrant Email: shopperhelper.vip@domainsbyproxy.com  Registry Tech ID: CR426069586  Tech Name: Registration Private  Tech Organization: Domains By Proxy, LLC  Tech Street: DomainsByProxy.com  Tech Street: 14455 N. Hayden Road  Tech City: Scottsdale  Tech State/Province: Arizona  Tech Postal Code: 85260  Tech Country: US  Tech Phone: +1.4806242599  Tech Phone Ext:  Tech Fax: +1.4806242598  Tech Fax Ext:  Tech Email: shopperhelper.vip@domainsbyproxy.com</p>
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	<p>Registry Admin ID: CR426069587  Admin Name: Registration Private  Admin Organization: Domains By Proxy, LLC  Admin Street: DomainsByProxy.com  Admin Street: 14455 N. Hayden Road  Admin City: Scottsdale  Admin State/Province: Arizona  Admin Postal Code: 85260  Admin Country: US  Admin Phone: +1.4806242599  Admin Phone Ext:  Admin Fax: +1.4806242598  Admin Fax Ext:  Admin Email: shopperhelper.vip@domainsbyproxy.com  Name Server: NS67.DOMAINCONTROL.COM  Name Server: NS68.DOMAINCONTROL.COM  DNSSEC: unsigned</p>
SSQIAN.VIP	<p>Domain Name: SSQIAN.VIP  Registry Domain ID:  D_012A9006_D8C4AB3C35504DA9A8A3E26EC927FC13_0000016CBA249827-VIP  Registrar WHOIS Server: whois.godaddy.com  Registrar URL: <a href="http://www.godaddy.com">http://www.godaddy.com</a>  Updated Date: 2019-08-22T22:47:53Z  Creation Date: 2019-08-22T16:24:16Z  Registrar Registration Expiration Date: 2022-08-22T16:24:16Z  Registrar: GoDaddy.com, LLC  Registrar IANA ID: 146  Registrar Abuse Contact Email: <a href="mailto:abuse@godaddy.com">abuse@godaddy.com</a>  Registrar Abuse Contact Phone: +1.4806242505  Domain Status: clientTransferProhibited  <a href="http://www.icann.org/epp#clientTransferProhibited">http://www.icann.org/epp#clientTransferProhibited</a>  Domain Status: clientUpdateProhibited  <a href="http://www.icann.org/epp#clientUpdateProhibited">http://www.icann.org/epp#clientUpdateProhibited</a>  Domain Status: clientRenewProhibited  <a href="http://www.icann.org/epp#clientRenewProhibited">http://www.icann.org/epp#clientRenewProhibited</a>  Domain Status: clientDeleteProhibited  <a href="http://www.icann.org/epp#clientDeleteProhibited">http://www.icann.org/epp#clientDeleteProhibited</a>  Registrant Organization:  Registrant State/Province: Beijing  Registrant Country: CN  Registrant Email: Select Contact Domain Holder link at  <a href="https://www.godaddy.com/whois/results.aspx?domain=ssqian.vip">https://www.godaddy.com/whois/results.aspx?domain=ssqian.vip</a>  Tech Email: Select Contact Domain Holder link at  <a href="https://www.godaddy.com/whois/results.aspx?domain=ssqian.vip">https://www.godaddy.com/whois/results.aspx?domain=ssqian.vip</a>  Admin Email: Select Contact Domain Holder link at</p>

<p>https://www.godaddy.com/whois/results.aspx?domain=ssqian.vip  Name Server: BOB.NS.CLOUDFLARE.COM  Name Server: CRUZ.NS.CLOUDFLARE.COM  DNSSEC: unsigned</p>
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**IP ADDRESS****Hosting Company**

**Choopa LLC  
100 Matawan Rd  
Matawan, NJ 07747  
United States**

**Choopa LLC  
The Constant Company, LLC  
319 Clematis St. Suite 900  
West Palm Beach, FL 33401  
United States**

167.179.75.11

<p>irt: IRT-CHOOPALLC-AP  address: 100 Matawan Rd, Matawan NJ 07747  e-mail: abuse@choopa.com  abuse-mailbox: abuse@choopa.com  admin-c: CLA15-AP  tech-c: CLA15-AP  auth: # Filtered  remarks: abuse@choopa.com was validated on 2021-02-09  mnt-by: MAINT-CHOOPALLC-AP  last-modified: 2021-02-09T13:51:43Z  source: APNIC</p> <p>role: ABUSE CHOOPALLCAP  address: 100 Matawan Rd, Matawan NJ 07747  country: ZZ  phone: +000000000  e-mail: abuse@choopa.com  admin-c: CLA15-AP  tech-c: CLA15-AP  nic-hdl: AC1765-AP  remarks: Generated from irt object IRT-CHOOPALLC-AP  abuse-mailbox: abuse@choopa.com  mnt-by: APNIC-ABUSE  last-modified: 2020-06-18T15:26:12Z  source: APNIC</p>
--

	<p>role: Choopa LLC administrator  address: 100 Matawan Rd, Matawan NJ 07747  country: US  phone: +1-973-849-0501  fax-no: +1-973-849-0501  e-mail: abuse@choopa.com  admin-c: CLA15-AP  tech-c: CLA15-AP  nic-hdl: CLA15-AP  mnt-by: MAINT-CHOOPALLC-AP  last-modified: 2014-11-18T00:32:03Z  source: APNIC</p> <p>route: 167.179.64.0/18  origin: AS20473  descr: Choopa, LLC  14 Cliffwood Ave  Suite 300  mnt-by: MAINT-CHOOPALLC-AP  last-modified: 2020-04-21T14:40:04Z  source: APNIC</p>
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**E-COMMERCE ACCOUNT**

**E-Commerce Account Provider**

**Shopify, Inc.**  
**c/o**  
**The Corporation Trust Company**  
**1209 Orange St**  
**Wilmington, DE 19808**  
**United States**

**Shopify (USA), Inc.**  
**33 New Montgomery St., Suite 750**  
**San Francisco, CA 94105-4537**  
**United States**

E-commerce account associated with the domain ShopperHelper.vip	Shopify, Inc. Shopify (USA), Inc.
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