

BRAGAR, WEXLER & EAGEL, P.C.  
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(973) 471-4010

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665 Fifth Avenue  
New York, NY 10022  
(212) 688-5151

Attorneys for Plaintiff  
Rolex Watch U.S.A., Inc.

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

ROLEX WATCH U.S.A., INC.,  
  
Plaintiff,

v.

ALEXANDER ROZENFELD a/k/a  
ALEXANDRE ROZENFELD, VICTORIA  
ROZENFELD A/K/A VIKTORIYA  
ROZENFELD; IGOR STEPANOVA,  
INDIVIDUALLY AND d/b/a  
[WWW.REPLICAMAKER.COM](http://WWW.REPLICAMAKER.COM),  
[WWW.REPLICAEXPERT.US](http://WWW.REPLICAEXPERT.US) AND RV  
VENTURE CAPITAL, INC.; UNKNOWN  
WEBSITES 1-10; VARIOUS JOHN DOES  
1-10, AND UNKNOWN ENTITIES 1-10,  
  
Defendants.

**CIVIL ACTION NO. 06-0799**

**CERTIFICATION OF RONALD D.  
COLEMAN, ESQ. PURSUANT TO THE  
ORDER OF SEPTEMBER 25, 2006 AS  
AMENDED**

Ronald D. Coleman, an attorney at law, admitted to  
practice in the Courts of the State of New Jersey and a

member of the Bar of this court, and a member of the firm Bragar Wexler & Eagel P.C., attorneys for plaintiff Rolex Watch U.S.A., Inc. ("Rolex" or "Plaintiff") herein, certifies and says:

1. I am familiar with all of the facts and proceedings heretofore had herein and make this certification pursuant to this court's Order dated September 25, 2006, as amended by the Order of November 9, 2006.

2. On or about November 16, 2006, this office prepared four separate Federal Express packages for delivery, containing copies of the Summonses, Amended Complaint and the two above-mentioned Orders to the separate defendants at the Moscow, Russia address indicated in the Order. Each package is reported by Federal Express to have been delivered to that address, as set forth in the attached printouts (Exh. A).

3. We also transmitted the same documents by First Class Mail on the date hereof.

4. Also pursuant to the order, on November 21, 2006, I personally transmitted copies of PDF files of the same documents, without the exhibits (which would have made the emails too large for delivery to typical email systems), to the five email addresses set forth in the September 25, 2006 Order, utilizing Microsoft Outlook. (See Exhibit B.) Only two of the five recipient emails were "bounced," meaning that I received automated responsive emails stating that two

of them - the ones at [support@replicamaker.com](mailto:support@replicamaker.com) and [orders@replicamaker.com](mailto:orders@replicamaker.com) - could not be delivered because the recipients "could not be found." In fact it is the [www.ReplicaMaker.com](http://www.ReplicaMaker.com) website which is no longer operative, as alleged in the Amended Complaint, so it is not surprising that these two email addresses, utilizing the same domain, are no longer functional.

5. The other three emails, sent to two Yahoo! email addresses and the third at [orders@replicaexpert.us](mailto:orders@replicaexpert.us), were, upon information and belief, successfully delivered. Defendants' website at [www.ReplicaExpert.us](http://www.ReplicaExpert.us) is, in fact, still operational as of the date of this Certification and defendants are still actively engaged in the sale of counterfeit Rolex watches at that website (see Exhibit C).

6. The [www.ReplicaExpert.us](http://www.ReplicaExpert.us) website also gives an email address of [support@replicaexpert.us](mailto:support@replicaexpert.us) for inquiries (See Exhibit C). On the date of this Certification I also transmitted these documents by email to that address. (See Exhibit D.)

7. Based on the foregoing, there is every reason to assume that at least four emails containing the Summons, Complaint, and the Orders governing substituted service were received by defendants. This is in addition to the four Federal Express packages we know to have been received at the Moscow address from which Rolex has good reason to believe defendants have done or do business or have resided

or do reside, or both.

8. I contacted the four Russian periodicals set forth in the Order by email as well. Of these four, only one, *Pravda*, responded to my inquiry. *Pravda* informed me by email this morning that it would publish Rolex's legal notice. We will file a supplemental Certification following that publication including proof thereof and showing the text of the announcement in English and Russian.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements are willfully false, I am subject to punishment.

\_\_\_\_\_/s\_\_\_\_\_

RONALD D. COLEMAN

Dated: November 27, 2006

# EXHIBIT A

Track Shipments

## Detailed Results

<b>Tracking number</b>	836852773441	<b>Destination</b>	MOSCOW
<b>Signed for by</b>	.PROK		RU
<b>Ship date</b>	Nov 16, 2006	<b>Delivered to</b>	Residence
<b>Delivery date</b>	Nov 20, 2006 4:00 PM	<b>Service type</b>	Priority Pak
		<b>Weight</b>	1.4 lbs.
<b>Status</b>	Delivered		

Date/Time	Activity	Location	Details
<b>Nov 20, 2006</b>	4:00 PM	<b>Delivered</b>	
	8:26 AM	On FedEx vehicle for delivery	
	8:11 AM	Int'l shipment release	
	8:11 AM	At local FedEx facility	
<b>Nov 18, 2006</b>	10:20 PM	Clearance in progress	
	10:10 PM	In transit	Package available for clearance
	2:31 AM	At dest sort facility	
<b>Nov 17, 2006</b>	9:56 PM	In transit	Package available for clearance
	2:16 AM	Departed FedEx location	
<b>Nov 16, 2006</b>	11:15 PM	Left origin	
	10:40 PM	Arrived at FedEx location	
	7:58 PM	Left origin	
	5:04 PM	Picked up	

Subscribe to tracking updates (optional)

Your  
Name:

Your E-mail  
Address:

Track Shipments

## Detailed Results

<b>Tracking number</b>	836852772993	<b>Destination</b>	38-1-64 MOSCOW
<b>Signed for by</b>	.PROK		RU
<b>Ship date</b>	Nov 16, 2006	<b>Delivered to</b>	Residence
<b>Delivery date</b>	Nov 20, 2006 4:00 PM	<b>Service type</b>	Priority Pak
		<b>Weight</b>	1.4 lbs.
<b>Status</b>	Delivered		

Date/Time	Activity	Location	Details
<b>Nov 20, 2006</b>	4:00 PM	<b>Delivered</b>	38-1-64 MOSCOW RU
	8:26 AM	On FedEx vehicle for delivery	MOSCOW RU
	8:11 AM	Int'l shipment release	MOSCOW RU
	8:11 AM	At local FedEx facility	MOSCOW RU
<b>Nov 18, 2006</b>	10:20 PM	Clearance in progress	MOSCOW RU
	10:10 PM	In transit	MOSCOW RU
	2:31 AM	At dest sort facility	POYLE GB
<b>Nov 17, 2006</b>	9:56 PM	In transit	POYLE GB
	3:04 AM	Departed FedEx location	NEWARK, NJ
<b>Nov 16, 2006</b>	11:15 PM	Left origin	NEW YORK, NY
	10:40 PM	Arrived at FedEx location	NEWARK, NJ
	7:58 PM	Left origin	NEW YORK, NY
	5:04 PM	Picked up	NEW YORK, NY

Subscribe to tracking updates (optional)

Your  
Name:

Your E-mail  
Address:

Track Shipments

## Detailed Results

<b>Tracking number</b>	836852772971	<b>Destination</b>	38-1-64 MOSCOW
<b>Signed for by</b>	.PROK		RU
<b>Ship date</b>	Nov 16, 2006	<b>Delivered to</b>	Residence
<b>Delivery date</b>	Nov 20, 2006 4:00 PM	<b>Service type</b>	Priority Pak
		<b>Weight</b>	1.4 lbs.
<b>Status</b>	Delivered		

Date/Time	Activity	Location	Details
<b>Nov 20, 2006</b>	4:00 PM	<b>Delivered</b>	
	8:26 AM	On FedEx vehicle for delivery	
	8:11 AM	Int'l shipment release	
	8:11 AM	At local FedEx facility	
<b>Nov 18, 2006</b>	10:20 PM	Clearance in progress	
	10:10 PM	In transit	Package available for clearance
	2:31 AM	At dest sort facility	
<b>Nov 17, 2006</b>	9:56 PM	In transit	Package available for clearance
	2:16 AM	Departed FedEx location	
<b>Nov 16, 2006</b>	11:15 PM	Left origin	
	10:40 PM	Arrived at FedEx location	
	7:58 PM	Left origin	
	5:04 PM	Picked up	

Subscribe to tracking updates (optional)

Your  
Name:

Your E-mail  
Address:



Track Shipments

## Detailed Results

<b>Tracking number</b>	836852772982	<b>Destination</b>	38-1-64 MOSCOW
<b>Signed for by</b>	.PROK		RU
<b>Ship date</b>	Nov 16, 2006	<b>Delivered to</b>	Residence
<b>Delivery date</b>	Nov 20, 2006 4:00 PM	<b>Service type</b>	Priority Pak
		<b>Weight</b>	1.4 lbs.
<b>Status</b>	Delivered		

Date/Time	Activity	Location	Details
<b>Nov 20, 2006</b>	4:00 PM	<b>Delivered</b>	
	8:26 AM	On FedEx vehicle for delivery	
	8:11 AM	Int'l shipment release	
	8:11 AM	At local FedEx facility	
<b>Nov 18, 2006</b>	10:20 PM	Clearance in progress	
	10:10 PM	In transit	Package available for clearance
	2:31 AM	At dest sort facility	
<b>Nov 17, 2006</b>	9:56 PM	In transit	Package available for clearance
	2:16 AM	Departed FedEx location	
<b>Nov 16, 2006</b>	11:15 PM	Left origin	
	10:40 PM	Arrived at FedEx location	
	7:58 PM	Left origin	
	5:04 PM	Picked up	

Subscribe to tracking updates (optional)

Your  
Name:

Your E-mail  
Address:

# EXHIBIT B

**Ronald Coleman**

---

**From:** Ronald Coleman  
**Sent:** Tuesday, November 21, 2006 3:06 PM  
**To:** 'rvcapital@yahoo.com'; 'ruclub@yahoo.com'; 'support@replicamaker.com'; 'orders@replicamaker.com'; 'orders@replicaexpert.us'  
**Subject:** Lawsuit by Rolex Watch, USA  
**Importance:** High  
**Sensitivity:** Private  
**Attachments:** Summons - RV Venture Cap.pdf; Summons - Victoria Rozenfeld.pdf; Summons - Alexander Rozenfeld.pdf; Summons - Igor Stepanova.pdf; ECF Complaint exhibits with header.pdf; Order granting motion.pdf; Order.pdf

November 21, 2006

**BY EMAIL**

Alexander Rozenfeld  
Victoria Rozenfeld  
Igor Stepanova  
RV Venture Capital, Inc.  
% Michael Kavtaskin  
Prok Alexander, St. Acad. Anohina  
38-1-64  
Moscow, 119602 RUSSIA

**Re: Rolex Watch U.S.A., Inc. v. Rozenfeld, et al.**  
**Civil Action No. 06 CV 0799 (DMC)**

Enclosed please find a copy of the Summonses and Amended Complaint in the referenced lawsuit in which you are a defendant in the U.S. District Court for the District of New Jersey, along with an Order of that Court, as amended, authorizing service on you via substitute service, including by this correspondence.

Very truly yours,

/S/

Ronald D. Coleman

enc.

## Bragar Wexler & Egel, PC



Ronald D. Coleman

Coleman@BragarWexler.com

Big firm success in a small package

### Bragar Wexler & Egel, PC

One Gateway Center  
Suite 2600  
Newark, NJ 07102

tel: 973-471-4010   
tel2: 212-308-5858   
fax: 973-471-4646

*Add me to your address book...*

# EXHIBIT C



Replica Watch Store Home

Swiss Replica Watches

Japanese Replica Watches

Limited Edition

Shopping Cart

Contact Us

International: +1 585-200-3088 Fax: +1 866-835-2094

Search:



Advanced search

Printable version

Categories

Replica Watches - Swiss Movement

- + Breguet
- + Breitling
- + Cartier
- + Franck Muller
- + Officine Panerai
- + Omega
- + Patek Philippe
- + Rolex
- + Vacheron Constantin

Replica Watches - Japanese Movement

- + A. Lange & Sohne
- + Alain Silberstein
- + Audemars Piguet
- + Blancpain
- + Breguet
- + Breitling
- + Bvlgari
- + Cartier
- + Chanel
- + Chronoswiss
- + Corum
- + Franck Muller
- + Gianni Versace
- + Girard Perregaux
- + Glashutte
- + IWC
- + Jaeger LeCoultre
- + Longines
- + Montblanc
- + Officine Panerai
- + Omega
- + Patek Philippe
- + Rado
- + Rolex
- + Ulysse Nardin
- + Vacheron Constantin

Limited Edition Replica Watches

Watch Boxes

Replica Watch Store :: Replica Watches - Japanese Movement :: Rolex

- Earn bonuses!**  
1 point for every \$1 you spend in our store!
- Free products!**  
Convert earned points into free products!
- 10% discounts!**  
If you buy 2 or more watches!

[more offers >>>](#)

Your cart

Cart is empty

[View cart](#)  
[Checkout](#)

Authentication

Username

Password

[Log in](#)

[Register](#)

[Recover password](#)

If Javascript is disabled in your browser click [here](#)

News

**24-10-2006**  
Latest news about new products and great articles to learn everything you need to know to safely purchase a replica watches.

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Articles

- Choose a category:*
- [Watch-making Events](#)
  - [Historical articles](#)
  - [Famous watch models](#)
  - [Watch collecting](#)
  - [Unique collections](#)

[All Articles](#)

Rolex

**DayDate** (16 Products)



**GMT Master** (3 Products)



**Submariner** (11 Products)



**Yachtmaster** (9 Products)



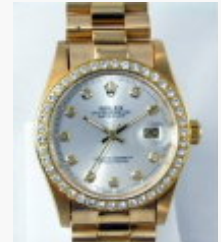
**Explorer** (2 Products)



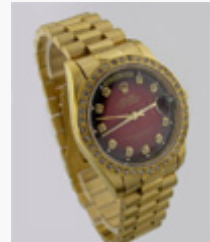
**Daytona** (15 Products)



**DateJust** (13 Products)



**Masterpiece** (6 Products)




**Cellini Prince** (4 Products)



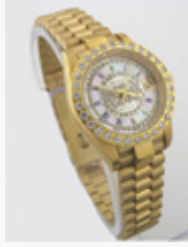
 **Bestsellers**

1. Daytona Skeleton
2. Submariner Steel
3. Daytona Stainless Steel
4. Turnograph Gold Oyster
5. Daytona Leather Band


 **Special**

Special offers

**Ladies**  
**Rolex** (18 Products)



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Replica Watch Store Home

Swiss Replica Watches

Japanese Replica Watches

Limited Edition

Shopping Cart

Contact Us

International: +1 585-200-3088 Fax: +1 866-835-2094

Search:

Go

Advanced search

Categories

Replica Watches - Swiss Movement

- + Breguet
- + Breitling
- + Cartier
- + Franck Muller
- + Officine Panerai
- + Omega
- + Patek Philippe
- + Rolex
- + Vacheron Constantin

Replica Watches - Japanese Movement

- + A. Lange & Sohne
- + Alain Silberstein
- + Audemars Piguet
- + Blancpain
- + Breguet
- + Breitling
- + Bvlgari
- + Cartier
- + Chanel
- + Chronoswiss
- + Corum
- + Franck Muller
- + Gianni Versace
- + Girard Perregaux
- + Glashutte
- + IWC
- + Jaeger LeCoultre
- + Longines
- + Montblanc
- + Officine Panerai
- + Omega
- + Patek Philippe
- + Rado
- + Rolex
- + Ulysse Nardin
- + Vacheron Constantin

Limited Edition Replica Watches

Watch Boxes

Replica Watch Store :: Help zone

- 1. Earn bonuses!**  
1 point for every \$1 you spend in our store!
- 2. Free products!**  
Convert earned points into free products!
- 3. 10% discounts!**  
If you buy 2 or more watches!

more offers >>>

Help zone

You can send a message to us using the form below.

You can contact customer support by email:support@replicaexpert.us; phone: 1 585-200-3088; fax: 1 866-835-2094

Contact us

Username

Title \*

First Name \*

Last Name \*

Company

Address \*

Address (line 2)

City \*

State \*

Country \*

Zip/Postal code \*

Phone \*

E-Mail \*

Department \*

Subject \*

Your cart

Cart is empty

View cart  
Checkout

Authentication

Username

Password

Log in

Register **Go**

Recover password

If Javascript is disabled in your browser click here

News

24-10-2006


Latest news about new products and great articles to learn everything you need to know to safely purchase a replica watches.

Previous News

Your email:

Subscribe **Go**



 **Special**  
Special offers

**Message** \*


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 **Articles**  
Choose a category:

- Watch-making Events
- Historical articles
- Famous watch models
- Watch collecting
- Unique collections

---

All Articles

 **Help**

- Contact us
- Privacy statement
- Conditions
- Site Map

**Ronald Coleman**

**From:** Ronald Coleman  
**Sent:** Monday, November 27, 2006 4:17 PM  
**To:** 'support@replicaexpert.us'  
**Subject:** Lawsuit by Rolex Watch, USA

**Importance:** High  
**Sensitivity:** Private

**Attachments:** Summons - RV Venture Cap.pdf; Summons - Victoria Rozenfeld.pdf; Summons - Alexander Rozenfeld.pdf; Summons - Igor Stepanova.pdf; ECF Complaint exhibits with header.pdf; Order granting motion.pdf; Order.pdf; Ronald D. Coleman (coleman@bragarwexler.com).vcf



Summons - RV  
Venture Cap.pdf (...



Summons - Victoria  
Rozenfeld.p...



Summons -  
Alexander Rozenfeld..



Summons - Igor  
Stepanova.pdf (...



ECF Complaint  
exhibits with he...



Order granting  
motion.pdf (77 ...



Order.pdf (77 KB)



Ronald D. Coleman  
(coleman@bra...  
November 27, 2006

BY EMAIL

Alexander Rozenfeld  
Victoria Rozenfeld  
Igor Stepanova  
RV Venture Capital, Inc.  
% Michael Kavtaskin  
Prok Alexander, St. Acad. Anohina  
38-1-64  
Moscow, 119602 RUSSIA

Re: Rolex Watch U.S.A., Inc. v. Rozenfeld, et al.  
Civil Action No. 06 CV 0799 (DMC)

Enclosed please find a copy of the Summonses and Amended Complaint in the referenced lawsuit in which you are a defendant in the U.S. District Court for the District of New Jersey, along with an Order of that Court, as amended, authorizing service on you via substitute service, including by this correspondence.

Very truly yours,

/S/

Ronald D. Coleman enc.

Ronald D. Coleman  
Bragar Wexler & Eagel, PC  
One Gateway Center  
Suite 2600

# EXHIBIT D

Newark, NJ 07102  
Coleman@BragarWexler.com  
tel:  
tel2:  
fax:  
973-471-4010  
212-308-5858  
973-471-4646

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