

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVEN MADDEN, LTD.,

Plaintiff,

v.

YVES SAINT LAURENT and LUXURY
GOODS INTERNATIONAL
(LGI) S.A.,

Defendants.

CIVIL ACTION NO. 18-cv-07592

JUDGE: Hon. Valerie E. Caproni

YVES SAINT LAURENT and LUXURY
GOODS INTERNATIONAL
(LGI) S.A.,

Counterclaim Plaintiff,

v.

STEVEN MADDEN, LTD. and
STEVEN MADDEN RETAIL, INC.,
Counterclaim Defendants.

**FIRST AMENDED COUNTERCLAIMS OF YVES SAINT LAURENT and LUXURY
GOODS INTERNATIONAL (LGI) S.A. AGAINST STEVEN MADDEN, LTD. and
STEVEN MADDEN RETAIL, INC.**

1. Yves Saint Laurent and Luxury Goods International (LGI) S.A. (“LGI”, and collectively with Yves Saint Laurent as the “Saint Laurent Parties”) hereby assert the following Counterclaims against Steve Madden, Ltd. and Steve Madden Retail, Inc. (collectively, “Madden”) for Trademark Infringement, Trademark Counterfeiting, False Designation of Origin and Unfair Competition arising under the Trademark Act of 1946, as amended (15 U.S.C. § 1051 *et seq.*); Patent Infringement, arising under the Patent Act (35 U.S.C. §§ 271, 281, and 283);

Deceptive Trade Practices and Injury to Business Reputation, arising under N.Y. General Business Law §§ 349 and 360-l; and unfair competition arising under the Common Law of the State of New York.

2. The Saint Laurent Parties incorporate by reference Paragraphs 1-125 of its Answer and its Affirmative Defenses into these Counterclaims.

3. These Counterclaims arise out of the same series of transactions and events as set forth in Madden's Complaint for Declaratory Judgment.

PARTIES

4. Counterclaim Plaintiff Yves Saint Laurent is a corporation duly organized and existing by virtue of the laws of France and maintains its principal place of business at 7, Avenue George V, 75008 Paris, France.

5. Counterclaim Plaintiff Luxury Goods International (LGI) S.A. is a corporation duly organized and existing by virtue of the laws of Switzerland and maintains its principal place of business at Via Industria 19 6814, Cadempino, Switzerland.

6. Upon information and belief, Counterclaim Defendant Steve Madden, Ltd. is a corporation duly organized and existing by virtue of the laws of Delaware and maintains its principal place of business at 52-16 Barnett Avenue, Long Island City, New York, 11104.

7. Upon information and belief, Defendant Steven Madden Retail Inc. is a corporation duly organized and existing by virtue of the laws of New York. Defendant Steve Madden Retail Inc. maintains its principal place of business at 52-16 Barnett Avenue, Long Island City, New York 11104, and owns and/or operates retail store locations within this judicial district.

JURISDICTION AND VENUE

8. Upon information and belief, Counterclaim Defendants have committed and are committing acts of Trademark Infringement, Trademark Counterfeiting, Patent Infringement, False Designation of Origin, and Unfair Competition, as hereinafter alleged, in this District, through manufacturing, displaying, selling, importing, distributing, advertising and using Counterclaim Plaintiffs' trade dress and patented materials.

9. This action is Trademark Infringement, Trademark Counterfeiting, False Designation of Origin and Unfair Competition arising under the Trademark Act of 1946, as amended (15 U.S.C. § 1051 *et seq.*); Patent Infringement, arising under the Patent Act (35 U.S.C. §§ 271, 281, and 283); Deceptive Trade Practices and Injury to Business Reputation, arising under N.Y. General Business Law §§ 349 and 360-1; and unfair competition arising under the Common Law of the State of New York.

10. This Court has original jurisdiction over the Trademark Infringement, Trademark Counterfeiting, False Designation of Origin, Unfair Competition and Patent Infringement claims pursuant to 28 U.S.C. §§ 1331, 1337 and 1338(a); 1338(b); 15 U.S.C. § 1125; and 35 U.S.C. §§ 271, 281, and 238. This Court has supplemental jurisdiction over the state law claims pursuant to 28 U.S.C. § 1367(a).

11. This Court has personal jurisdiction over Madden based on Madden's Complaint for Declaratory Judgment filed with this Court on August 20, 2018.

12. Venue is proper in this District pursuant to 28 U.S.C. § 1391(b)(1) and (2) because Counterclaim Defendants reside in this Judicial District and/or because a substantial part of the events or acts giving rise to Counterclaim Plaintiffs' claims occurred in this Judicial District.

BACKGROUND

A. Plaintiff's Iconic TRIBUTE Sandal

13. Counterclaim Plaintiff Yves Saint Laurent operates the Yves Saint Laurent (“YSL”) fashion house.

14. The YSL fashion house and YSL brand were founded in 1961 by designer Yves Saint Laurent and his patron Pierre Bergé. The YSL fashion house is a luxury fashion house known for designing men's and women's ready-to-wear clothing and shoes, as well as accessories such as handbags, jewelry, and eyewear, among other goods and services.

15. The YSL fashion house is one of the world's leading fashion houses and is known throughout the world for innovative and trend-setting ready-to-wear clothing, shoes and fashion accessories. The YSL fashion house's designs are among the most sought-after in the fashion industry. For over fifty years, the YSL fashion house has pioneered fashion with groundbreaking and iconic designs, which are routinely showcased by top celebrities and style icons. This tradition continues strongly into the present day with the YSL fashion house's association with celebrities such as Kate Moss, Zoe Kravitz, Charlotte Gainsbourg, Travis Scott, Timothée Chalamet, and many others.

16. Counterclaim Plaintiff LGI is the owner of the entire right, title and interest in numerous U.S. federally registered trademarks for the marks YSL, YVES SAINT LAURENT, SAINT LAURENT, SAINT LAURENT PARIS, and RIVE GAUCHE, all of which are famous, valid, subsisting, incontestable and un-cancelled trademark registrations. These marks are collectively referred to as the “YSL Marks”.

17. Counterclaim Plaintiffs apply the YSL Marks to their products offered for sale in the U.S. and use the YSL Marks in relation to services offered in the U.S.

18. All products bearing the YSL Marks are identified and recognized as being exclusively from Counterclaim Plaintiffs by virtue of the use of these marks.

19. The YSL Marks are featured prominently in advertisements that regularly appear in nationally-circulating magazines and seen by hundreds of millions of people.

20. In addition to Counterclaim Plaintiffs' own advertising bearing the YSL Marks, the YSL Marks have garnered and continue to reap significant unsolicited media coverage in the United States. Products bearing the YSL Marks have been featured in various U.S. publications, including Vogue, Vanity Fair, Elle, Women's Wear Daily, GQ Magazine, the New York Times, T Magazine, WSJ Magazine, Interview, New York Magazine, Harper's BAZAAR, V, V Man, and W Magazine, among others.

21. Clothing designs bearing the YSL Marks are featured in fashion editorials and are often credited with forecasting the upcoming seasons for women's ready-to-wear apparel. One of the well-known designs of the YSL brand is a shoe design used in connection with its iconic TRIBUTE Sandal.

22. The TRIBUTE Sandal became an instant sensation, drawing wide acclaim among fashion editors, celebrities and consumers.

23. LGI first began selling the TRIBUTE Sandal in the United States in October 2007.

24. Since October 2007, LGI has continuously sold the TRIBUTE Sandal in the United States. The TRIBUTE Sandals are available for purchase throughout the U.S. in authorized retailers, in SAINT LAURENT boutiques, in Yves Saint Laurent outlets and on the Internet through YSL's own website, www.ysl.com.

25. The TRIBUTE Sandals have received and continue to attract press coverage in the United States. The TRIBUTE Sandals have been featured in various publications, including the New York Times, Vogue magazine, Women's Wear Daily and the Washington Post.

26. The TRIBUTE Sandals have been widely photographed and referenced in popular media, appearing in publications when carried by front page celebrities including Demi Lovato, Olivia Palermo, Elizabeth Banks, Julia Roberts, Kelly Ripa, Jennifer Lopez, Juliana Moore and many others.

27. The TRIBUTE Sandals are renowned for their high quality and are identified and recognized as originating exclusively from LGI.

28. The TRIBUTE Sandals are a commercial embodiment of U.S. Design Patent No. D607,187 (the "187 Patent") a copy of which is attached as Exhibit A, which covers a new, original and ornamental design for a shoe. Yves Saint Laurent owns all right, title and interest in and to the '187 Patent.

29. Since their debut, the TRIBUTE Sandals have been offered for sale in various different heel and platform heights, materials, and colors. However, the unique design of the TRIBUTE Sandal remains consistent throughout these variations. The TRIBUTE Sandals are offered in a number of styles, including but not limited to high-heeled sandals (the "TRIBUTE Heels") and flat sandals (the "TRIBUTE Flats"). These styles all share significant design similarities with one another, and in fact are highly related designs. Images of some of these various iterations of the TRIBUTE Sandals are attached hereto as Exhibit B.

30. The TRIBUTE Flats and the TRIBUTE Heels are each characterized by identical distinctive design elements common to all TRIBUTE Sandals, most notably, a shared toe-bed design. This design is, in and of itself, a distinctive, non-functional trade dress that identifies LGI

as the source of any footwear bearing this distinctive design and serves to distinguish LGI's goods from those of other manufacturers.

31. The distinctive design of the TRIBUTE trade dress is comprised of the combination and arrangement of various elements, as follows:

- a) two U shaped pieces each attached to one side of the shoe so that the rounded end is facing in towards the middle of the toe bed;
- b) a strap that bisects the U shaped straps and crosses the toe bed; and
- c) a circular strap element, either emanating from a t-strap or as a standalone element, with the U-shaped pieces and the bisecting strap woven together with the bisecting middle strap going under the circular strap element and then over the ends of the two U-shaped pieces in the center of the circular strap element to create an intricate pattern over the toe bed.

(Hereinafter, the "TRIBUTE Trade Dress").

32. The combination, arrangement and articulation of the ornamental elements of the TRIBUTE Trade Dress make the TRIBUTE Trade Dress distinctive and immediately identifiable to consumers.

33. The TRIBUTE Trade Dress is non-functional, as it is not essential to the use, purpose, cost or quality of the TRIBUTE Sandals, and the Saint Laurent Parties' exclusive use of the TRIBUTE Trade Dress would not put competitors at a significant non-reputation-related disadvantage, as there are countless other means of assembling a shoe design that do not involve using the same or confusingly similar combination and arrangement of elements that make up the TRIBUTE Trade Dress.

34. LGI is the owner of the entire right, title, and interest in the TRIBUTE Trade Dress.

35. The TRIBUTE Sandal design, in its many iterations and embodiments, each of which feature the TRIBUTE Trade Dress, has received press coverage since at least as early as October 2007, including over the Internet and through various press media.

36. In addition, the TRIBUTE Heels contain a distinctive, non-functional trade dress that identifies LGI as the source of any footwear bearing this distinctive design and serves to distinguish LGI's goods from those of other manufacturers.

37. The TRIBUTE Heels are also distinctively designed and easily recognized by consumers as originating from LGI.

38. The TRIBUTE Heels trade dress is comprised of the combination and arrangement of various elements, as follows:

- elements (a) – (c) of the TRIBUTE Trade Dress described in Paragraph 31 of these Amended Counterclaims; whereas the circular strap of element (c) emanates from a t-strap that extends from the ankle to the toe bed;
- a platform sole at the toe which is beveled underneath the toe bed and slopes inward at an angle until meeting the sole which extends outward at an alternate angle;
- a stiletto heel; and
- an ankle strap which is formed by two straps which are intertwined at both sides of the ankle and then diverge, one to towards the heel and the other around the front of the ankle and which connects to the T-strap.

(Hereinafter, the “TRIBUTE Heels Trade Dress”).

39. The combination, arrangement and articulation of the ornamental elements of the TRIBUTE Heels Trade Dress make the TRIBUTE Heels Trade Dress distinctive and immediately identifiable to consumers.

40. The TRIBUTE Heels Trade Dress is non-functional, as it is not essential to the use, purpose, cost or quality of the TRIBUTE Heels, and the Saint Laurent Parties' exclusive use of the TRIBUTE Heels Trade Dress would not put competitors at a significant non-reputation-related disadvantage, as there are countless other means of assembling a shoe design that do not involve using the same or confusingly similar combination and arrangement of elements that make up the TRIBUTE Heel Trade Dress.

41. LGI is the owner of the entire right, title, and interest in the TRIBUTE Heels Trade Dress.

42. In addition, the TRIBUTE Flats contain a distinctive, non-functional trade dress that identifies LGI as the source of any footwear bearing this distinctive design and serves to distinguish LGI's goods from those of other manufacturers.

43. The TRIBUTE Flats are distinctively designed and easily recognized by consumers as originating from LGI.

44. The TRIBUTE Flats trade dress is comprised of the combination and arrangement of various elements, as follows:

- elements (a) – (c) of the TRIBUTE Trade Dress described in Paragraph 31 of these Amended Counterclaims; whereas the circular strap of element (c) is a standalone element; and
- a substantially flat sole.

(Hereinafter the "TRIBUTE Flats Trade Dress").

45. The combination, arrangement and articulation of the ornamental elements of the TRIBUTE Flats Trade Dress make the TRIBUTE Flats Trade Dress distinctive and immediately identifiable to consumers.

46. The TRIBUTE Flats Trade Dress is non-functional, as it is not essential to the use, purpose, cost or quality of the TRIBUTE Flats, and the Saint Laurent Parties' exclusive use of the TRIBUTE Flats Trade Dress would not put competitors at a significant non-reputation-related disadvantage as there are countless other means of assembling a shoe design that do not involve using the same or confusingly similar combination and arrangement of elements that make up the TRIBUTE Flats Trade Dress.

47. LGI is the owner of the entire right, title, and interest in the TRIBUTE Flats Trade Dress.

48. The TRIBUTE Flats Trade Dress and the TRIBUTE Heels Trade Dress are highly related designs; with only a difference in heel type and the inclusion of the t-strap that extends from the ankle to the toe bed in the TRIBUTE Heels Trade Dress differentiating the two designs.

49. The TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and TRIBUTE Flats Trade Dress are famous in the U.S.

50. The TRIBUTE Sandals, in their various iterations and embodiments, have been promoted, both in the United States and throughout the world, and the TRIBUTE Sandals are among the world's most famous and widely recognized. Consumers, potential consumers and other members of the public and fashion industry recognize that products bearing the TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and/or the TRIBUTE Flats Trade Dress as originating exclusively from LGI.

B. Defendant’s Infringing Conduct

51. Upon information and belief, without permission or authorization from Counterclaim Plaintiffs, Counterclaim Defendants have manufactured, advertised and sold footwear (the “Infringing Kananda/Kissme Sandal”) in the United States and abroad, whose features infringe the ‘187 Patent and infringe the distinctive TRIBUTE Trade Dress and TRIBUTE Heels Trade Dress.

52. Upon information and belief, Counterclaim Defendants have sold their Infringing Kananda/Kissme Sandal under the STEVE MADDEN and WILD PAIR brands, as depicted below:

Counterclaim Plaintiff / Saint Laurent Parties’ TRIBUTE Sandal	Counterclaim Defendant / Madden’s Infringing STEVE MADDEN “Kananda” Sandal	Counterclaim Defendant / Madden’s Infringing WILD PAIR “Kissme” Sandal
		
		

53. Counterclaim Defendants' Infringing Kananda/Kissme Sandal is comprised of the following features:

- a platform sole at the toe which is beveled underneath the toe bed and slopes inward at an angle until meeting the sole which extends outward at an alternate angle;
- a stiletto heels;
- a toe strap comprised of two U shaped pieces each attached to one side of the shoe so that the rounded end is facing in towards the middle of the toe bed;
- a strap that bisects the U shaped straps and crosses the toe bed;
- a rounded piece over the toe bed that weaves together the bisecting middle strap going under the circular shape and then over the ends of the two U-shaped pieces in the center of the circular shape to create an intricate pattern over the toe bed; and
- an ankle strap formed by two straps which are intertwined at both sides of the ankle and then diverge, one to towards the heel and the other around the front of the ankle.

54. Counterclaim Defendants' Infringing Kananda/Kissme Sandal is a studied copy of the TRIBUTE Heels design features that are protected by the '187 Patent, TRIBUTE Trade Dress and TRIBUTE Heels Trade Dress.

55. Counterclaim Defendants' Infringing Kananda/Kissme Sandal is made of lesser quality materials than those of the TRIBUTE Heels.

56. Upon information and belief, Counterclaim Defendants intentionally copied or caused to be copied the ornamental design elements of TRIBUTE Heels for the specific purpose of infringing on Counterclaim Plaintiffs' '187 Patent, TRIBUTE Trade Dress, and TRIBUTE Heels Trade Dress.

57. Counterclaim Defendants' Infringing Kananda/Kissme Sandal feature shapes and design elements that are identical or virtually identical to the shapes and design elements featured in TRIBUTE Heels.

58. Counterclaim Defendants' Infringing Kananda/Kissme Sandal constitutes an identical or virtually identical arrangement to that of the original features and elements which constitute Counterclaim Plaintiffs' TRIBUTE Heels.

59. Counterclaim Defendants' own customers have remarked that the Infringing Kananda/Kissme Sandal replicates the TRIBUTE Heels. Copies of customer reviews from Counterclaim Defendants' website www.stevemadden.com and from third party retailers selling the Infringing Kananda/Kissme Sandal are attached hereto as Exhibit C.

60. In their Declaratory Judgment Complaint, Counterclaim Defendants admit that the Infringing Kananda/Kissme Sandal and the TRIBUTE Heel are offered for sale to the same class of consumers. *See* Declaratory Judgment Complaint, D.E. 1, at ¶ 102 (alleging that it would be likely that "prospective consumers of Madden's sandals [would] be forced to purchase Defendants' sandals based on the absence of Madden's sandals being available for sale...").

61. Counterclaim Defendants' reputation for producing knock-offs of designer fashion articles further corroborates Counterclaim Defendants' deliberate pattern of willful infringement and unfair competition.

62. Counterclaim Defendants were sued in October 2009 in this Court by the British design house Alexander McQueen for trade dress infringement of an Alexander McQueen shoe design. *See Autumnpaper Limited, trading as Alexander McQueen v. Steven Madden, Ltd. and Steven Madden Retail, Inc.*, Southern District of New York Case No. 09-CV-08332.

63. The French fashion house Balenciaga also twice initiated suit against the Counterclaim Defendants for infringement of its distinctive designs. *See Balenciaga v. Steve Madden Ltd.*, Eastern District of New York Case No. 09-CV-05458 and *Balenciaga v. Steven Madden, Ltd. and Steven Madden Retail, Inc.*, Southern District of New York Case No. 14-CV-3627.

64. In recent years, the Counterclaim Defendants have also been sued for trade dress and/or patent infringement by brands including STELLA MCCARTNEY (*Stella McCartney Limited v. Steven Madden Ltd.*, Southern District of New York Case No. 15-CV-07906), SKECHERS (*Skechers U.S.A., Inc. v. Steven Madden, Ltd.*, Central District of California Case No. 15-CV-05123) and DR. MARTENS (*AirWair International Ltd. v. Steven Madden, Ltd.*, Northern District of California Case No. 17-CV-01024).

65. Counterclaim Defendants are well aware of the TRIBUTE Heels, and are aware of Counterclaim Plaintiffs' rights in the TRIBUTE Heels. Counterclaim Defendants had knowledge of Plaintiffs' '187 Patent and TRIBUTE Heels Trade Dress since at least as early as January 22, 2013, when Counterclaim Plaintiffs notified Counterclaim Defendants that their AILEENN footwear, depicted below, infringed upon Counterclaim Plaintiffs' rights in the TRIBUTE Heels.

Counterclaim Plaintiffs / Saint Laurent Parties' TRIBUTE Sandal	Counterclaim Defendants / Madden's Infringing AILEEN Sandal
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66. On information and belief, Counterclaim Defendants were aware of the TRIBUTE Trade Dress well before they began selling the Infringing Kananda/Kissme Sandal.




67. Counterclaim Defendants continue a pattern of misappropriation with this infringement of the TRIBUTE Heels.

68. Notwithstanding the parties' prior dispute related to the TRIBUTE Heels and the Counterclaim Defendants' infringing AILEEN footwear, Counterclaim Plaintiffs' provided Counterclaim Defendants with further notice of their infringing conduct on June 17, 2016. A true and correct copy of Counterclaim Plaintiffs' June 17, 2016 letter is attached hereto as Exhibit D.

69. Upon information and belief, Counterclaim Defendants continued to offer for sale and sell the Infringing Kananda/Kissme Sandal even after Counterclaim Plaintiffs provided notice of the infringement.

70. Upon information and belief, without permission or authorization from Counterclaim Plaintiffs, Counterclaim Defendants have manufactured, advertised and sold footwear (the "Infringing Kadri Sandal" and the "Infringing Kaiden Sandal") in the United States whose features infringe the '187 Patent and infringe the distinctive TRIBUTE Trade Dress and TRIBUTE Heels Trade Dress.

71. Upon information and belief, Counterclaim Defendants have sold their Infringing Kadri Sandal and Infringing Kaiden Sandal under the STEVE MADDEN brand, as depicted below:

Counterclaim Plaintiff / Saint Laurent Parties’ TRIBUTE Sandal	Counterclaim Defendant / Madden’s Infringing Kadri Sandal	Counterclaim Defendant / Madden’s Infringing Kaiden Sandal
		
		

72. Counterclaim Defendants’ Infringing Kadri Sandal is largely identical to Madden’s earlier infringing AILEEN sandal, and is comprised of the following features:

- a platform sole at the toe which is beveled underneath the toe bed and slopes inward at an angle until meeting the sole which extends outward at an alternate angle;
- a stiletto heel;
- a toe strap comprised of two U shaped pieces each attached to one side of the shoe so that the rounded end is facing in towards the middle of the toe bed;
- a strap that bisects the U shaped straps and crosses the toe bed;
- a t-strap that extends from the ankle to the toe bed, and ends in a circular shape; and
- the circular shape which emanates from the t-strap, the U-shaped pieces and the bisecting strap are all woven together with the bisecting middle strap going under the circular shape and then over the ends of the two U-shaped pieces in the center of the circular shape to create an intricate pattern over the toe bed; and
- the ankle strap is formed by two straps which are intertwined at both sides of the ankle and then diverge, one to towards the heel and the other around the front of the ankle and which connects to the T-strap.

73. Counterclaim Defendants' Infringing Kaiden Sandal is largely identical to Counterclaim Defendants' Infringing Kananda/Kissme Sandal, which Counterclaim Defendant's claim to have discontinued (D.E. 1, at ¶¶ 57-65), and is comprised of the following features:

- a platform sole at the toe which is beveled underneath the toe bed and slopes inward at an angle until meeting the sole which extends outward at an alternate angle;
- a stiletto heels;
- a toe strap comprised of two U shaped pieces each attached to one side of the shoe so that the rounded end is facing in towards the middle of the toe bed;
- a strap that bisects the U shaped straps and crosses the toe bed;

- a rounded piece over the toe bed that weaves together the bisecting middle strap going under the circular shape and then over the ends of the two U-shaped pieces in the center of the circular shape to create an intricate pattern over the toe bed; and
- an ankle strap formed by two straps which are intertwined at both sides of the ankle and then diverge, one towards the heel and the other around the front of the ankle.

74. Counterclaim Defendants' Infringing Kadri Sandals and Infringing Kaiden Sandals are studied copies of the TRIBUTE Heels design features that are protected by the '187 Patent, TRIBUTE Trade Dress and TRIBUTE Heels Trade Dress.

75. Counterclaim Defendants' Infringing Kadri Sandals and Infringing Kaiden Sandals are made of lesser quality materials than those of the TRIBUTE Heels.

76. Upon information and belief, Counterclaim Defendants intentionally copied or caused to be copied the ornamental design elements of TRIBUTE Heels for the specific purpose of infringing on Counterclaim Plaintiffs' '187 Patent, TRIBUTE Trade Dress, and TRIBUTE Heels Trade Dress.

77. Counterclaim Defendants' Infringing Kadri Sandals and Infringing Kaiden Sandals feature shapes and design elements that are identical or virtually identical to the shapes and design elements featured in TRIBUTE Heels.

78. Counterclaim Defendants' Infringing Kadri Sandals and Infringing Kaiden Sandals constitute identical or virtually identical arrangement to that of the original features and elements which constitute Counterclaim Plaintiffs' TRIBUTE Heels.

79. On information and belief, Counterclaim Defendants continue to advertise, offer for sale, and sell the Infringing Kadri Sandals and Infringing Kaiden Sandals online and brick-

and-mortar retailers, despite having ample notice of the Saint Laurent Parties’ rights in the ‘187 Patent, TRIBUTE Trade Dress, and TRIBUTE Heels Trade Dress. *See, e.g.*, Exhibit E.

80. Upon information and belief, without permission or authorization from Counterclaim Plaintiffs, and despite receiving the notice of infringement enumerated above, Counterclaim Defendants also manufactured, advertised and sold flat sandals (the “Infringing Sicily Sandal”) whose features infringe the ‘187 Patent and infringe the distinctive TRIBUTE Trade Dress and TRIBUTE Flats Trade Dress.

81. Upon information and belief, Counterclaim Defendants have sold their Infringing Sicily Sandal under the STEVE MADDEN brand, as depicted below:

Counterclaim Plaintiffs / Saint Laurent Parties’ TRIBUTE Flat Sandal



Counterclaim Defendants / Madden’s Infringing Sicily Sandal: STEVE MADDEN “Sicily” Sandal



82. Counterclaim Defendants' Infringing Sicily Sandal is a flat sandal with a toe strap comprised of the following features:

- two U shaped pieces each attached to one side of the shoe so that the rounded end is facing in towards the middle of the toe bed;
- a strap that bisects the U shaped straps and crosses the toe bed; and
- a circular strap element with the U-shaped pieces and the bisecting strap woven together with the bisecting middle strap going under the circular strap element and then over the ends of the two U-shaped pieces in the center of the circular strap element to create an intricate pattern over the toe bed.

83. Counterclaim Defendants' Infringing Sicily Sandal is a studied copy of the TRIBUTE Flats design features that are protected by the '187 Patent, the TRIBUTE Trade Dress, and the TRIBUTE Flats Trade Dress.

84. Counterclaim Defendants' Sicily Sandal is made of lesser quality materials than those of the TRIBUTE Flats.

85. Notwithstanding the parties' prior dispute related to the TRIBUTE Sandal, Counterclaim Plaintiffs' provided Counterclaim Defendants with further notice of their infringing conduct on July 27, 2018. *See* D.E. 1, Exhibit B.

86. On information and belief, Counterclaim Defendants were aware of the '187 Patent, TRIBUTE Trade Dress, and TRIBUTE Flats Trade Dress well before they began selling the Infringing Sicily Sandal.

87. Upon information and belief, Counterclaim Defendants intentionally copied or caused to be copied the ornamental design elements of TRIBUTE Flats for the specific purpose

of infringing on Counterclaim Plaintiffs' '187 Patent, TRIBUTE Trade Dress, and TRIBUTE Flats Trade Dress.

88. Counterclaim Defendants' Infringing Sicily Sandal feature shapes and design elements that are identical or virtually identical to the shapes and design elements featured in TRIBUTE Flats.

89. Counterclaim Defendants' Infringing Sicily Sandal constitutes an identical or virtually identical arrangement to that of the original features and elements which constitute Counterclaim Plaintiffs' TRIBUTE Flats.

90. On information and belief, Counterclaim Defendants continue to advertise, offer for sale, and sell the Infringing Flat Sandal through their own online and brick-and-mortar retail stores, as well as through a number of online and brick-and-mortar retailers, including one or more retailers referenced by Madden in Paragraph 36 of its Complaint. *See, e.g.*, Exhibit F.

91. The acts of the Counterclaim Defendants are calculated to confuse and to deceive the public and are performed with full knowledge of Counterclaim Plaintiffs' rights.

92. Counterclaim Defendants have engaged in a pattern of deliberate and willful infringement designed to misappropriate Counterclaim Plaintiffs' patents and trade dress, confuse consumers as to the source of Counterclaim Defendants' products and trade upon the valuable good will and reputation of Counterclaim Plaintiffs and Counterclaim Plaintiffs' intellectual property.

93. Counterclaim Plaintiffs have lost substantial revenue and incurred damage as a result of Counterclaim Defendants' wrongful and infringing conduct.

94. As a direct and proximate result of the acts of the Counterclaim Defendants alleged above, Counterclaim Plaintiffs have already suffered irreparable damages and lost revenues.

COUNT I
PATENT INFRINGEMENT OF THE ‘187 PATENT (35 U.S.C. §§ 271 et seq.)

95. Counterclaim Plaintiffs restate and reaver each and every allegation contained in paragraphs 1 through 94 of these Counterclaims, inclusive, and the acts of the Counterclaim Defendants asserted therein, as if fully recited in this paragraph.

96. Counterclaim Plaintiff Yves Saint Laurent is the owner of the ‘187 Patent.

97. The ornamental design of the ‘187 Patent is embodied in the successful TRIBUTE Sandal sold by Counterclaim Plaintiffs in the U.S. and throughout the world.

98. On information and belief, Counterclaim Defendants had notice of the ‘187 Patent upon receipt of written notice at least as early as January 22, 2013 and upon subsequent written notices provided in June 2016 and July 2018, and/or upon the filing of Counterclaim Plaintiff’s original Answer and Counterclaims.

99. Upon information and belief, Counterclaim Defendants have applied Counterclaim Plaintiffs’ ornamental design as articulated in the ‘187 Patent, or a colorable imitation thereof, to the Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and the Infringing Sicily Sandal for the purpose of sale and or selling or exposing for sale these infringing goods.

100. By virtue of the manufacture, offer for sale and sale of the Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden and the Infringing Sicily Sandal or alternatively by contributing and inducing others to sell or offer for sale the Infringing

Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and the Infringing Sicily Sandal, the Counterclaim Defendants have infringed the '187 Patent, literally and/or under the doctrine of equivalents.

101. On information and belief, Counterclaim Defendants will continue to infringe the claims of the '187 Patent unless enjoined by this Court.

102. Counterclaim Defendants' acts, as alleged herein, constitute patent infringement in violation of 35 U.S.C. §§ 271 et seq. and have damaged Counterclaim Plaintiffs in an amount not yet subject to determination.

COUNT II
TRADEMARK INFRINGEMENT OF THE TRIBUTE TRADE DRESS (15 U.S.C. § 1125)

103. Counterclaim Plaintiffs restate and reaver each and every allegation contained in paragraphs 1 through 102 of these Counterclaims, inclusive, and the acts of the Counterclaim Defendants asserted therein, as if fully recited in this paragraph.

104. Upon information and belief, long after Counterclaim Plaintiffs' adoption and use of the TRIBUTE Trade Dress on its products, and well after the TRIBUTE Trade Dress acquired secondary meaning, Counterclaim Defendants began selling, offering for sale, distributing, promoting and advertising footwear in interstate commerce incorporating counterfeit and infringing copies of the TRIBUTE Trade Dress.

105. The spurious designs used by Counterclaim Defendants in interstate commerce are identical to, or substantially indistinguishable from, the TRIBUTE Trade Dress.

106. Counterclaim Defendants' use of the TRIBUTE Trade Dress in conjunction with advertising, promotion, offer for sale, distribution and sale of Counterclaim Defendants' the

Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and the Infringing Sicily Sandal was and is without the consent of Counterclaim Plaintiffs.

107. Counterclaim Defendants' unauthorized use of the TRIBUTE Trade Dress on and in connection with Counterclaim Defendants' advertisement, promotion, sale, offering for sale and distribution of the Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and the Infringing Sicily Sandal through Steve Madden and third party retail stores and on the internet constitute Counterclaim Defendants' use of the TRIBUTE Trade Dress in commerce.

108. Counterclaim Defendants' unauthorized use of the TRIBUTE Trade Dress, as set forth above, is likely to cause confusion, mistake and deception.

109. Counterclaim Defendants' unauthorized use of the TRIBUTE Trade Dress, as set forth above, is likely to cause the public to believe that Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal are the same as Counterclaim Plaintiffs' TRIBUTE Sandals or that Counterclaim Defendants are authorized, sponsored or approved by Counterclaim Plaintiffs or that Counterclaim Defendants are affiliated, connected or associated with or in some way related to Counterclaim Plaintiffs.

110. Upon information and belief, Counterclaim Defendants are attempting to pass off their Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal as Counterclaim Plaintiffs' product in a manner calculated to deceive Counterclaim Plaintiffs' customers and members of the general public in that Counterclaim Defendants have copied or caused to be copied Counterclaim Plaintiffs' protected TRIBUTE Sandals in an effort to make Counterclaim Defendants' Infringing Kananda/Kissme Sandal,

Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal confusingly similar to Counterclaim Plaintiffs' TRIBUTE Sandals and/or pass off Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal as Counterclaim Plaintiffs' own TRIBUTE Sandals.

111. By replicating the TRIBUTE Trade Dress on Counterclaim Defendants' goods, Counterclaim Defendants are trading on the Counterclaim Plaintiffs' goodwill and reputation and creating the false impression that Counterclaim Defendants' goods are Counterclaim Plaintiffs' legitimate products.

112. Counterclaim Defendants' use of the TRIBUTE Trade Dress or copies thereof on Counterclaim Defendants' products is likely to cause consumers, the public and the trade to believe erroneously that the goods sold by Counterclaim Defendants emanate or originate from Counterclaim Plaintiffs, or that said items are authorized, sponsored, or approved by Counterclaim Plaintiffs, even though they are not.

113. This confusion causes irreparable harm to Counterclaim Plaintiffs and weakens the distinctive quality of the TRIBUTE Trade Dress.

114. Upon information and belief, the Counterclaim Defendants have engaged in a pattern of deliberate and willful infringement designed to confuse and deceive consumers as to the source and origin of Counterclaim Defendants' products and trade upon Counterclaim Plaintiffs' valuable intellectual property, good will and reputation.

115. Counterclaim Defendants' unauthorized use of the TRIBUTE Trade Dress, as set forth above, is likely to result in Counterclaim Defendants unfairly benefiting from Counterclaim Plaintiffs' advertising and promotion and profiting from the reputation of Counterclaim Plaintiffs and the TRIBUTE Trade Dress all to the substantial and irreparable injury of the public, of the

Counterclaim Plaintiff and of the TRIBUTE Trade Dress and the substantial goodwill represented thereby.

116. Counterclaim Defendants' acts, as alleged herein, constitute willful and malicious trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. §1125 and have damaged Counterclaim Plaintiffs in an amount not yet subject to determination.

COUNT III
TRADEMARK INFRINGEMENT OF THE TRIBUTE HEELS TRADE DRESS
(15 U.S.C. § 1125)

117. Counterclaim Plaintiffs restate and reaver each and every allegation contained in paragraphs 1 through 116 of these Counterclaims, inclusive, and the acts of the Counterclaim Defendants asserted therein, as if fully recited in this paragraph.

118. Upon information and belief, long after Counterclaim Plaintiffs' adoption and use of the TRIBUTE Heels Trade Dress on its products, and well after the TRIBUTE Heels Trade Dress acquired secondary meaning, Counterclaim Defendants began selling, offering for sale, distributing, promoting and advertising footwear in interstate commerce incorporating counterfeit and infringing copies of the TRIBUTE Heels Trade Dress.

119. The spurious designs used by Counterclaim Defendants in interstate commerce are identical to, or substantially indistinguishable from, the TRIBUTE Heels Trade Dress.

120. Counterclaim Defendants' use of the TRIBUTE Heels Trade Dress in conjunction with advertising, promotion, offer for sale, distribution and sale of Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal and Infringing Kaiden Sandal was and is without the consent of Counterclaim Plaintiffs.

121. Counterclaim Defendants' unauthorized use of the TRIBUTE Heels Trade Dress on and in connection with Counterclaim Defendants' advertisement, promotion, sale, offering for sale and distribution of the Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal and Infringing Kaiden Sandal through Steve Madden retail stores and on the Internet constitute Counterclaim Defendants' use of the TRIBUTE Heels Trade Dress in commerce.

122. Counterclaim Defendants' unauthorized use of the TRIBUTE Heels Trade Dress, as set forth above, is likely to cause confusion, mistake and deception.

123. Counterclaim Defendants' unauthorized use of the TRIBUTE Heels Trade Dress, as set forth above, is likely to cause the public to believe that Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal and Infringing Kaiden Sandal are the same as Counterclaim Plaintiffs' TRIBUTE Heels or that Counterclaim Defendants are authorized, sponsored or approved by Counterclaim Plaintiffs or that Counterclaim Defendants are affiliated, connected or associated with or in some way related to Counterclaim Plaintiffs.

124. Upon information and belief, Counterclaim Defendants are attempting to pass off their Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal and Infringing Kaiden Sandal as Counterclaim Plaintiffs' product in a manner calculated to deceive Counterclaim Plaintiffs' customers and members of the general public in that Counterclaim Defendants have copied or caused to be copied Counterclaim Plaintiffs' protected TRIBUTE Heels, in an effort to make Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal and Infringing Kaiden Sandal confusingly similar to Counterclaim Plaintiffs' TRIBUTE Heels and/or pass off Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal and Infringing Kaiden Sandal as Counterclaim Plaintiffs' own TRIBUTE Heels.

125. By replicating the TRIBUTE Heels Trade Dress on Counterclaim Defendants' goods, Counterclaim Defendants are trading on the Counterclaim Plaintiffs' goodwill and reputation and creating the false impression that Counterclaim Defendants' goods are Counterclaim Plaintiffs' legitimate products.

126. Counterclaim Defendants' use of the TRIBUTE Heels Trade Dress or copies thereof on Counterclaim Defendants' products is likely to cause consumers, the public and the trade to believe erroneously that the goods sold by Counterclaim Defendants emanate or originate from Counterclaim Plaintiffs, or that said items are authorized, sponsored, or approved by Counterclaim Plaintiffs, even though they are not.

127. This confusion causes irreparable harm to Counterclaim Plaintiffs and weakens the distinctive quality of the TRIBUTE Heels Trade Dress.

128. Upon information and belief, the Counterclaim Defendants have engaged in a pattern of deliberate and willful infringement designed to confuse and deceive consumers as to the source and origin of Counterclaim Defendants' products and trade upon Counterclaim Plaintiffs' valuable intellectual property, good will and reputation.

129. Counterclaim Defendants' unauthorized use of the TRIBUTE Heels Trade Dress, as set forth above, is likely to result in Counterclaim Defendants unfairly benefiting from Counterclaim Plaintiffs' advertising and promotion and profiting from the reputation of Counterclaim Plaintiffs and the TRIBUTE Heels Trade Dress all to the substantial and irreparable injury of the public, of the Counterclaim Plaintiff and of the TRIBUTE Heels Trade Dress and the substantial goodwill represented thereby.

130. Counterclaim Defendants' acts, as alleged herein, constitute willful and malicious trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. §1125 and have damaged Counterclaim Plaintiffs in an amount not yet subject to determination.

COUNT IV
TRADEMARK INFRINGEMENT OF THE TRIBUTE FLATS TRADE DRESS
(15 U.S.C. § 1125)

131. Counterclaim Plaintiffs restate and reaver each and every allegation contained in paragraphs 1 through 130 of these Counterclaims, inclusive, and the acts of the Counterclaim Defendants asserted therein, as if fully recited in this paragraph.

132. Upon information and belief, long after Counterclaim Plaintiffs' adoption and use of the TRIBUTE Flats Trade Dress on its products, and well after the TRIBUTE Flats Trade Dress acquired secondary meaning, Counterclaim Defendants began selling, offering for sale, distributing, promoting and advertising footwear in interstate commerce incorporating counterfeit and infringing copies of the TRIBUTE Flats Trade Dress.

133. The spurious designs used by Counterclaim Defendants in interstate commerce are identical to, or substantially indistinguishable from, the TRIBUTE Flats Trade Dress.

134. Counterclaim Defendants' use of the TRIBUTE Flats Trade Dress in conjunction with advertising, promotion, offer for sale, distribution and sale of Counterclaim Defendants' Infringing Sicily Sandal was and is without the consent of Counterclaim Plaintiffs.

135. Counterclaim Defendants' unauthorized use of the TRIBUTE Flats Trade Dress on and in connection with Counterclaim Defendants' advertisement, promotion, sale, offering for sale and distribution of the Infringing Sicily Sandal through Steve Madden retail stores and on

the Internet constitute Counterclaim Defendants' use of the TRIBUTE Flats Trade Dress in commerce.

136. Counterclaim Defendants' unauthorized use of the TRIBUTE Flats Trade Dress, as set forth above, is likely to cause confusion, mistake and deception.

137. Counterclaim Defendants' unauthorized use of the TRIBUTE Flats Trade Dress, as set forth above, is likely to cause the public to believe that Counterclaim Defendants' Infringing Sicily Sandals are the same as Counterclaim Plaintiffs' TRIBUTE Flats or that Counterclaim Defendants are authorized, sponsored or approved by Counterclaim Plaintiffs or that Counterclaim Defendants are affiliated, connected or associated with or in some way related to Counterclaim Plaintiffs.

138. Upon information and belief, Counterclaim Defendants are attempting to pass off their Infringing Sicily Sandal as Counterclaim Plaintiffs' product in a manner calculated to deceive Counterclaim Plaintiffs' customers and members of the general public in that Counterclaim Defendants have copied or caused to be copied Counterclaim Plaintiffs' protected TRIBUTE Flats in an effort to make Counterclaim Defendants' Infringing Sicily Sandal confusingly similar to Counterclaim Plaintiffs' TRIBUTE Flats and/or pass off Counterclaim Defendants' Infringing Sicily Sandal as Counterclaim Plaintiffs' own TRIBUTE Flats.

139. By replicating the TRIBUTE Flats Trade Dress on Counterclaim Defendants' goods, Counterclaim Defendants are trading on the Counterclaim Plaintiffs' goodwill and reputation and creating the false impression that Counterclaim Defendants' goods are Counterclaim Plaintiffs' legitimate products.

140. Counterclaim Defendants' use of the TRIBUTE Flats Trade Dress or copies thereof on Counterclaim Defendants' products is likely to cause consumers, the public and the

trade to believe erroneously that the goods sold by Counterclaim Defendants emanate or originate from Counterclaim Plaintiffs, or that said items are authorized, sponsored, or approved by Counterclaim Plaintiffs, even though they are not.

141. This confusion causes irreparable harm to Counterclaim Plaintiffs and weakens the distinctive quality of the TRIBUTE Flats Trade Dress.

142. Upon information and belief, the Counterclaim Defendants have engaged in a pattern of deliberate and willful infringement designed to confuse and deceive consumers as to the source and origin of Counterclaim Defendants' products and trade upon Counterclaim Plaintiffs' valuable intellectual property, good will and reputation.

143. Counterclaim Defendants' unauthorized use of the TRIBUTE Flats Trade Dress, as set forth above, is likely to result in Counterclaim Defendants unfairly benefiting from Counterclaim Plaintiffs' advertising and promotion and profiting from the reputation of Counterclaim Plaintiffs and the TRIBUTE Flats Trade Dress all to the substantial and irreparable injury of the public, of the Counterclaim Plaintiff and of the TRIBUTE Flats Trade Dress and the substantial goodwill represented thereby.

144. Counterclaim Defendants' acts, as alleged herein, constitute willful and malicious trademark infringement in violation of Section 32 of the Lanham Act, 15 U.S.C. §1125 and have damaged Counterclaim Plaintiffs in an amount not yet subject to determination.

COUNT V
UNFAIR COMPETITION AND FALSE DESIGNATION OF ORIGIN OR
SPONSORSHIP (15 U.S.C. § 1125(a))

145. Counterclaim Plaintiffs restate and reaver each and every allegation contained in paragraphs 1 through 144 of these Counterclaims, inclusive, and the acts of Counterclaim Defendants asserted therein, as if fully recited in this paragraph.

146. Counterclaim Defendants are not now, nor have they ever been, associated, affiliated or connected with, or endorsed or sanctioned by Counterclaim Plaintiffs.

147. The Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal sold by the Counterclaim Defendants copy the Counterclaim Plaintiffs' protected trade dress and constitute false designation of origin of goods sold by the Counterclaim Defendants and false representations that Counterclaim Defendants' goods are sponsored, endorsed, licensed or authorized by, or affiliated or connected with the Counterclaim Plaintiffs.

148. Counterclaim Defendants, without the consent or authorization of Counterclaim Plaintiffs, have adopted and utilized the Plaintiffs' protected trade dress in Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal.

149. Counterclaim Defendants' misappropriation of the Counterclaim Plaintiffs' protected trade dress is likely to cause and to have caused purchasers in interstate commerce to be confused, misled or deceived between Counterclaim Plaintiffs' goods and Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal.

150. Upon information and belief, Counterclaim Defendant knowingly adopted and used copies, variations, simulations or colorable imitations of the Counterclaim Plaintiffs' protected trade dress with full knowledge of Counterclaim Plaintiffs' intellectual property rights in the same.

151. Counterclaim Defendants have engaged in a systematic pattern of copying of the Counterclaim Plaintiffs' protected trade dress, in an attempt to benefit unfairly from Counterclaim Plaintiffs' creativity and good will.

152. Counterclaim Defendants have unfairly benefited and profited from Counterclaim Plaintiffs' outstanding reputation for high quality products and Counterclaim Plaintiffs' advertising and promotion of their TRIBUTE Sandals.

153. Counterclaim Plaintiffs have no control over the nature and quality of the products sold by Counterclaim Defendants bearing the counterfeit trade dress.

154. Among other things, Counterclaim Defendants' distribution, sale, offers of sale, promotion and advertisement of its Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal has reflected adversely on Counterclaim Plaintiffs as the believed source of origin thereof, hampered continuing efforts by Counterclaim Plaintiffs to protect their outstanding reputation for high quality, originality and distinctive goods, and tarnished the goodwill and demand for genuine TRIBUTE Sandals and other products and, upon information and belief, will continue to do so unless enjoined by this Court.

155. Counterclaim Defendants' wrongful conduct has deprived Counterclaim Plaintiffs of opportunities for expanding good will.

156. Counterclaim Defendants' acts are both willful and malicious.

157. Counterclaim Defendants' activities, as alleged herein, constitute Unfair Competition and False Designations of Origin in violation of Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), and have damaged Counterclaim Plaintiff in an amount not yet subject to determination.

158. Counterclaim Plaintiffs have no adequate remedy at law.

COUNT VI
UNFAIR COMPETITION UNDER THE
COMMON LAW OF THE STATE OF NEW YORK

159. Counterclaim Plaintiffs restate and reaver each and every allegation contained in paragraphs 1 through 158 of these Counterclaims, inclusive, and the acts of the Counterclaim Defendants asserted therein, as if fully recited in this paragraph.

160. By reason of the foregoing, Counterclaim Defendants' activities, as alleged herein, constitute unfair competition with Counterclaim Plaintiffs and have damaged Counterclaim Plaintiffs in an amount not yet subject to determination.

COUNT VII
DECEPTIVE TRADE PRACTICES (N.Y. General Business Law § 349)

161. Counterclaim Plaintiffs restate and reaver each and every allegation contained in paragraphs 1 through 160 of these Counterclaims, inclusive, and the acts of the Counterclaim Defendants asserted therein, as if fully recited in this paragraph.

162. Counterclaim Defendants' misappropriation of the TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and the TRIBUTE Flats Trade Dress is in direct competition with the Counterclaim Plaintiffs' TRIBUTE Sandals.

163. Counterclaim Defendants' wholesale copying of the TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and the TRIBUTE Flats Trade Dress is likely to deceive consumers into believing that the Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal originate from Counterclaim Plaintiffs, or are associated with or authorized by Counterclaim Plaintiffs, when they are, in fact, not.

164. Counterclaim Defendants' copying of the TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and the TRIBUTE Flats Trade Dress is illustrative of Counterclaim

Defendants' established pattern of unlawful copying Counterclaim Plaintiffs' unique designs, as well as the designs of others.

165. By reason of the acts and practices as alleged herein, Counterclaim Defendants have engaged in deceptive trade practices or misleading activities in the conduct of business, trade or commerce, or furnishing of goods and/or services, in violation of § 349 of the New York General Business Law.

166. The public is likely to be damaged as a result of those deceptive trade practices or activities.

167. Counterclaim Defendants' acts are both willful and malicious.

168. Counterclaim Defendants' activities, as alleged herein, constitute deceptive trade practice pursuant to New York General Business Law § 349 and have damaged Counterclaim Plaintiffs in an amount not yet subject to determination.

COUNT VIII
INJURY TO BUSINESS REPUTATION (N.Y. General Business Law § 360-1)

169. Counterclaim Plaintiffs restate and reaver each and every allegation contained in paragraphs 1 through 168 of these Counterclaims, inclusive, and the acts of the Counterclaim Defendants asserted therein, as if fully recited in this paragraph.

170. Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing Sicily Sandal unlawfully copy the TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and/or the TRIBUTE Flats Trade Dress.

171. By applying an imitation of the TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and/or the TRIBUTE Flats Trade Dress to Counterclaim Defendants' Infringing Kananda/Kissme Sandal, Infringing Kadri Sandal, Infringing Kaiden Sandal and Infringing

Sicily Sandal, which are of a lesser quality and workmanship than the products originating from Counterclaim Plaintiffs, Counterclaim Defendants have injured and will continue to injure Counterclaim Plaintiffs' business reputation, have tarnished the distinctive quality of Counterclaim Plaintiffs' famous TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and the TRIBUTE Flats Trade Dress, and have lessened the capacity of Counterclaim Plaintiffs' famous TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and TRIBUTE Flats Trade Dress to identify and distinguish Counterclaim Plaintiffs' goods, in violation of N.Y. General Business Law § 360-1.

172. Counterclaim Defendants are likely to continue their pattern of copying Counterclaim Plaintiffs' unique and distinctive designs, thereby continuing the injury to Counterclaim Plaintiffs' business reputation, unless enjoined by this Court.

173. Counterclaim Defendants' acts are both willful and malicious.

174. Counterclaim Defendants' activities, as alleged herein, constitute injury to business reputation and dilution pursuant to New York General Business Law § 360-1 and have damaged Counterclaim Plaintiffs in an amount not yet subject to determination.

DEMAND FOR JURY TRIAL

Pursuant to Federal Rule of Civil Procedure 38, Counterclaim Plaintiffs hereby demand a trial by a jury on all issues triable by right of jury.

PRAYER FOR RELIEF

WHEREFORE, Counterclaim Plaintiffs pray:

(1) That the Counterclaim Defendants be required to account for and pay over all gains, profits, and advantages derived by the Counterclaim Defendants and any damages sustained by Counterclaim Plaintiffs as a result of the Counterclaim Defendant's activities constituting Patent Infringement, as enumerated herein.

(2) That the Counterclaim Defendants be required to account for and pay over all gains, profits, and advantages derived by the Counterclaim Defendants and any damages sustained by Counterclaim Plaintiffs as a result of its infringement of Counterclaim Plaintiffs' TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and TRIBUTE Flats Trade Dress, as enumerated herein.

(3) That the Counterclaim Defendants be required to account for and pay over all gains, profits, and advantages derived by the Counterclaim Defendants and any damages sustained by Counterclaim Plaintiffs as a result of the Defendants' activities constituting Unfair Competition, as enumerated herein.

(4) That the Counterclaim Defendants be required to account for and pay over all gains, profits, and advantages derived by the Counterclaim Defendants and any damages sustained by Counterclaim Plaintiffs as a result of the Counterclaim Defendants' activities constituting Common Law Unfair Competition, as enumerated herein.

(5) That the Counterclaim Defendants be required to account for and pay over all gains, profits, and advantages derived by the Counterclaim Defendants and any damages sustained by Counterclaim Plaintiffs as a result of the Counterclaim Defendants' activities constituting Deceptive Trade Practices, as enumerated herein.

(6) That pursuant to 35 U.S.C. § 283, 15 U.S.C. § 1116, N.Y. General Business Law § 360-1 and the equity jurisdiction of this court, the Counterclaim Defendants, their agents,

employees, or representatives, and all persons in privity therewith be permanently enjoined and restrained from using on or in connection with the sale, offering for sale, distribution, exhibition, display or advertising of its goods through the Internet or otherwise, Counterclaim Plaintiffs' '187 Patent, TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and TRIBUTE Flats Trade Dress, or any article confusingly or deceptively similar to or colorable imitation of the same, and from publishing, selling, marketing, or otherwise disposing of any copies of Counterclaim Defendants' material which have been derived in any manner by infringement of Plaintiffs' '187 Patent, TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and TRIBUTE Flats Trade Dress.

(7) That pursuant to 35 U.S.C. § 283, 15 U.S.C. §1116 and the equity jurisdiction of this court, the Counterclaim Defendants, their agents, employees, or representatives, and all persons in privity therewith be permanently enjoined and restrained from using on or in connection with the sale, offering for sale, distribution, exhibition, display or advertising of its goods through the Internet or otherwise, Counterclaim Plaintiffs' '187 Patent, TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and TRIBUTE Flats Trade Dress, or any article confusingly or deceptively similar to or colorable imitative of Counterclaim Plaintiffs' TRIBUTE Sandals.

(8) That the Counterclaim Defendants and their officers, agents, employees, or representatives, and all persons in privity with the Counterclaim Defendants deliver up to this Court, pursuant to 15 U.S.C. § 1118, any products in their possession bearing the Counterclaim Plaintiffs' TRIBUTE Trade Dress, TRIBUTE Heels Trade Dress, and/or TRIBUTE Flats Trade Dress, or any colorable imitation, for the purpose of destruction thereof.

(9) That, because of the willful nature of the infringements, the amounts of actual damages be trebled as provided for in 35 U.S.C. § 284 and 15 U.S.C. § 1117.

(10) That, because of the willful nature of the infringements, the Court find that this case is an exceptional case pursuant to 35 U.S.C. § 285 and 15 U.S.C. § 1117 and thus require Counterclaim Defendants to pay to Counterclaim Plaintiffs the costs of this action, including attorneys' fees and disbursements incurred

(11) Any such other and further relief as this Court deems just and equitable

Respectfully submitted for Counterclaim Plaintiffs,

By: 

Jess M. Collen (JC 2875)

Jeffrey A. Lindenbaum (JL 1971)

Michael Nesheiwat (MN 0453)

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(914) 941-6091 (facsimile)

Dated: November 20, 2018

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

STEVEN MADDEN, LTD.,
Plaintiff,

v.

YVES SAINT LAURENT and LUXURY
GOODS INTERNATIONAL
(LGI) S.A.,
Defendants.

CIVIL ACTION NO. 18-cv-07592
JUDGE: Hon. Valerie E. Caproni

YVES SAINT LAURENT and LUXURY
GOODS INTERNATIONAL
(LGI) S.A.,
Counterclaim Plaintiff,

v.

STEVEN MADDEN, LTD. and
STEVEN MADDEN RETAIL, INC.,
Counterclaim Defendants.

CERTIFICATE OF SERVICE

I, Michael Nesheiwat, hereby certify that: On the 20th day of November, 2018, I have caused service of the First Amended Counterclaims of Yves Saint Laurent and Luxury Goods International (LGI) S.A. against Steven Madden, Ltd. and Steven Madden Retail, Inc., dated November 20, 2018, to be made by electronic filing with the Clerk of the Court using the CM/ECF System, which will send a Notice of Electronic Filing to all parties of record, who have appeared and consent to electronic service in this action.

Very truly yours,
COLLEN



Michael Nesheiwat
Associate
mnesheiwat@collenip.com

EXHIBIT A



US00D607187S

(12) **United States Design Patent**
Hermann

(10) **Patent No.:** **US D607,187 S**

(45) **Date of Patent:** **** Jan. 5, 2010**

(54) **SHOE**

D92,238 S * 5/1934 Elkin D2/933

(75) Inventor: **Valérie Hermann**, Neuilly sur Seine (FR)

* cited by examiner

(73) Assignee: **Yves Saint Laurent**, Paris (FR)

Primary Examiner—Dominic Simone

(74) *Attorney, Agent, or Firm*—Collen IP; Donald J Ranft

(**) Term: **14 Years**

(57) **CLAIM**

(21) Appl. No.: **29/325,173**

The ornamental design for a shoe, as shown and described.

(22) Filed: **Sep. 26, 2008**

DESCRIPTION

(51) **LOC (9) Cl.** **02-99**

FIG. 1 is a right side view of my new, original and ornamental design for a shoe;

(52) **U.S. Cl.** **D2/930; D2/933; D2/925**

FIG. 2 is a left side view thereof;

(58) **Field of Classification Search** D2/896,

FIG. 3 is a top view thereof;

D2/916–918, 925–942, 946, 969, 971; 36/1, 36/83, 8.3, 45–58

FIG. 4 is a bottom view thereof;

See application file for complete search history.

FIG. 5 is a front view thereof;

(56) **References Cited**

FIG. 6 is a rear view thereof; and,

FIG. 7 is a left front perspective view thereof.

U.S. PATENT DOCUMENTS

D91,894 S * 4/1934 Miller D2/933

1 Claim, 4 Drawing Sheets



U.S. Patent

Jan. 5, 2010

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Fig. 1



Fig. 2



U.S. Patent

Jan. 5, 2010

Sheet 2 of 4

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Fig. 3

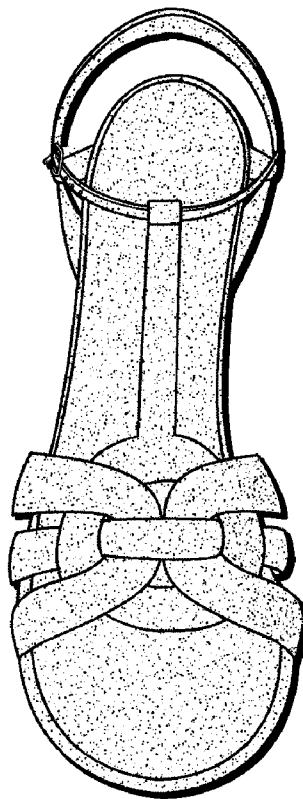
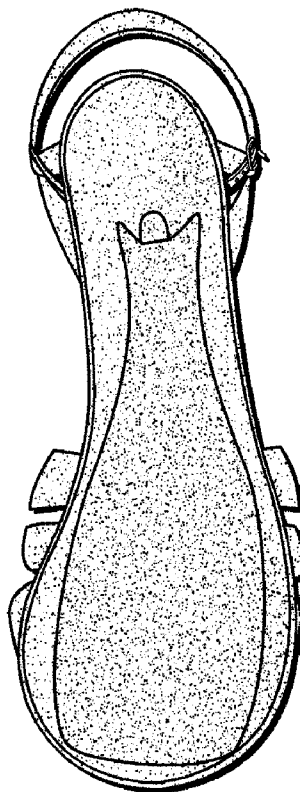


Fig. 4



U.S. Patent

Jan. 5, 2010

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Fig. 5

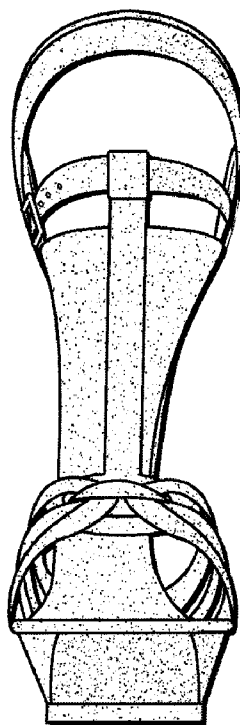
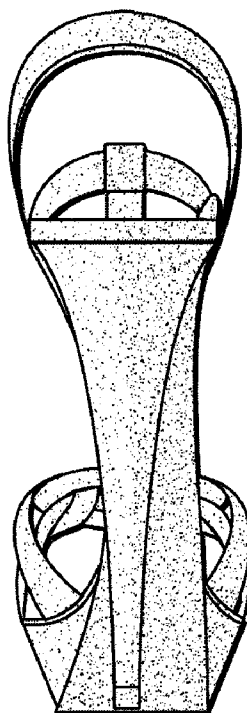


Fig. 6



U.S. Patent

Jan. 5, 2010

Sheet 4 of 4

US D607,187 S

Fig. 7



EXHIBIT B









EXHIBIT C

STEVE MADDEN

WHAT'S NEW WOMEN'S MEN'S HANDBAGS ACCESSORIES SALE CLEARANCE

FREEBIRD BY STEVEN TRENDS SM WORLD

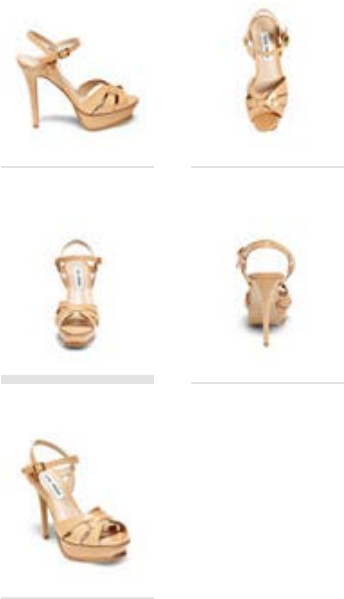
TRENDS / WOMEN'S / NUDES / KANANDA

KANANDA

\$109.95-\$129.95

5.0 (5)

[WRITE A REVIEW](#)



COLOR: BLUSH LEATHER -
\$109.95-\$129.95



SIZE: QTY:

Select 1

[LOVE IT!](#) | [FIND IN A STORE](#)

DETAILS

- The stylish KANANDA... Adorable, and simply the perfect addition to your outfit!
- Patent leather upper material
 - Man-made lining
 - Man-made sole
 - 5 inch heel height
 - 1.25 inch platform

**FREE
SHIPPING**

OVER \$50

with code **SMFREE50**
plus everyday free in-store returns

SIZE & FIT



SHIPPING & RETURNS



YOU MAY ALSO LIKE



XANDYY
\$39.98



KIERRA
\$99.95



FANCIE
\$79.95

**BE THE FIRST!
SHOW US HOW YOU WEAR IT**

TAG YOUR PHOTOS #STEVE MADDEN TO BE FEATURED ON OUR WEBSITE



[VIEW GALLERY](#)

[?]

REVIEWS

AVERAGE CUSTOMER RATINGS



Overall

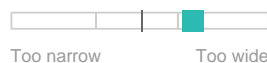


5.0

Sizing



Width



1-4 of 5 Reviews

Sort ▼ ≡



Didi · 5 days ago

SUPER SEXY, SUPER COMFY!

Spent all day shopping for a comfy neutral heel for a wedding. Finally found these! So comfortable, and so sexy. Only problem was I wanted to buy more. Have a feeling these heels and I are going to best friends this summer! LOL

Sizing



Width



Date Night/Night Out, Special Occasions

Yes, I recommend this product.

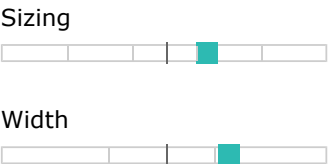
Helpful? Yes · 0 No · 0 Report



Karen808 · 2 months ago

COMFORTABLE AND SEXY

I bought this shoe for my wedding. Wanted something neutral that I could wear again after the event. This shoe was really comfortable and easy to walk in. Great dupe for the YSL but a forth of the price. Highly recommend.



Date Night/Night Out

Stylish, Value, Quality, Comfortable

Yes, I recommend this product.

Helpful? Yes · 2 No · 0 Report



GORGEIOUS SHOE

I have been eyeing the iconic tribute sandal for months, but still have a hard time dropping that much on something I'm not going to use that often. So, I was elated when I found this shoe. I ordered the black leather and they are so gorgeous. Nice leather, and surprisingly comfortable and not awkward to walk in. Seriously a beautiful shoe. Will be ordering in the leather blush! Sizing was spot on.

A horizontal number line with tick marks at 0, 1, 2, 3, 4, 5, 6, 7, 8, 9, and 10. A teal square is placed on the tick mark for the number 4.

A horizontal number line with tick marks at every integer from 0 to 10. A teal square is placed directly above the tick mark for the number 4.

Stylish, Value, Quality, Cute, Comfortable

Helpful? Yes · 3 No · 0 Report



83quamay · 2 months ago

GREAT BUY

These remind me of the YSL shoes but for only a fraction of the cost. They are pretty comfortable despite the high heel. I wore them to a wedding and was able to dance in them comfortably.

--	--	--	--	--	--	--	--

[illegible]

Stylish, Quality, Cute

Yes, I recommend this product.

Helpful? Yes · 4 No · 0 Report

1–4 of 5 Reviews



CUSTOMER

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MY ACCOUNT

ORDER TRACKING

RETURN POLICY

SHIPPING POLICY

SHOE SIZE CHART

CLEANING & CARE

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EXHIBIT D



Telephone (914) 941-5668

Facsimile (914) 941-6091

www.collen/IP.com

email: jcollen@collen/IP.com

June 17, 2016

BY EMAIL: dmiro@ostrolenk.com

Ostrolenk Faber LLP

1180 Avenue of the Americas

New York, NY 10036

Attention: Douglas Miro, Esq.

Re: U.S. Intellectual Property Infringement of SAINT
LAURENT TRIBUTE footwear designs by Steve Madden
Patent No. : D607,187
Ref No. : U622

Dear Doug:

As you are aware, this firm is intellectual property counsel to Luxury Goods International ("LGI").

As you know from our previous communications, LGI is the holder of all U.S. title and interest in intellectual property rights held by the Yves Saint Laurent Fashion House. It also owns all right, title and interest in its works, including the unique, popular and immediately recognizable branded SAINT LAURENT TRIBUTE Sandal. *Please see attached images of the SAINT LAURENT TRIBUTE Sandal (hereinafter, the "TRIBUTE Sandal") marked as Exhibit A).*

Since its debut in 2008, the TRIBUTE Sandal has garnered significant press coverage and has been offered for sale in various different colors and materials. However, the original design elements that comprise the TRIBUTE Sandal have remained consistent throughout these variations. As a result of favorable media attention and marketing efforts by LGI, the TRIBUTE Sandal, regardless of color or material, is easily recognized by consumers and potential consumers as originating from the Yves Saint Laurent Fashion House. You will also recall that the design of the TRIBUTE Sandal is registered with the U.S. Patent Office under Registration No. D607,187, a copy which is provided for your reference.

It has come to our attention that Steve Madden is offering for sale shoes which replicate the branded SAINT LAURENT TRIBUTE Sandal in exacting detail



Douglas Miro, Esq.
June 17, 2016
Page 2 of 4 – U622

(hereinafter, “Infringing Footwear”). The Infringing Footwear, namely the “KANANDA” model, is a virtually identical replica of the TRIBUTE Sandal and therefore misappropriates the original designs created by our client. (See a recent print out of the Infringing Footwear offered for sale on your website www.stevemadden.com attached herewith as Exhibit B.)

Below is a side-by-side comparison of YSL’s protected design and the infringing footwear being sold by your company:

TRIBUTE Sandal
SAINT LAURENT



KANANDA Infringing Footwear
STEVE MADDEN



Douglas Miro, Esq.
June 17, 2016
Page 3 of 4 – U622

Notably, customer reviews of the Infringing Footwear on Madden's website repeatedly acknowledge the striking similarity of the KANANDA Shoe to the TRIBUTE Sandals.

The similarity noted by consumers will not be a surprise to Madden. LGI's rights in the TRIBUTE Sandal were already outlined in our letter of January 22, 2013 concerning Madden's sale of the AILEENN footwear, as depicted below (Your File: 7/5125-70).



AILEENN by Steve Madden

Given Madden's prior knowledge of LGI's rights in the TRIBUTE Sandal and the parties' prior dispute relevant to the TRIBUTE Sandal design, the similarity of the Infringing Footwear to the TRIBUTE Sandal cannot be argued to be merely a coincidence. The repeated copying of LGI's famous and protected design, despite Madden's prior notice and knowledge of LGI's rights evidences willful infringement.

Madden's advertising, sale and offering for sale of the Infringing Footwear violates LGI's rights under the Lanham Act, the Patent Act and under state and common law. As you are well aware, U.S. Federal and state laws provide substantial penalties should a Court find infringement to have occurred. Therefore, we want to extend to you the opportunity to rectify this situation immediately and put this matter to rest.

To promptly and fully dispose of this matter and to avoid further damage to LGI's valuable intellectual property, we demand that Madden immediately cease and desist producing, selling or offering for sale the Infringing Footwear identified above.

Further still, we demand that Madden disclose to us the number of articles utilizing these designs which are in your inventory, and further, advise us of the

Douglas Miro, Esq.
June 17, 2016
Page 4 of 4 – U622

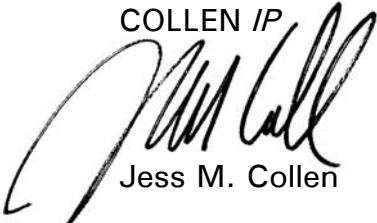
number of articles which have been sold by Madden to date. This information will allow us to ascertain the appropriate means to conclude this matter.

Our client is determined to fully enforce and protect all of the rights provided to it under the Patent and Trademark Laws of the United States, and this letter is being sent without prejudice to any such rights.

If you wish to resolve this matter amicably, please provide us with your assurances by June 30, 2016 that Madden will comply with the above stated terms.

We thank you in advance for your anticipated cooperation.

Very truly yours,
COLLEN /P



Jess M. Collen

JMC/OG:cs

Enclosure: Exhibit A (Printout from YSL.COM)
U.S. Patent Reg. No. D607,187
Exhibit B (Printout from STEVEMADDEN.COM)

EXHIBIT A

US00D607187S

(12) United States Design Patent
Hermann**(10) Patent No.: US D607,187 S**
(45) Date of Patent: ** Jan. 5, 2010**(54) SHOE**

D92,238 S * 5/1934 Elkin D2/933

(75) Inventor: Valérie Hermann, Neuilly sur Seine (FR)

* cited by examiner

(73) Assignee: Yves Saint Laurent, Paris (FR)*Primary Examiner—Dominic Simone***(**) Term: 14 Years***(74) Attorney, Agent, or Firm—Collen IP; Donald J Ranft***(21) Appl. No.: 29/325,173****(57) CLAIM****(22) Filed: Sep. 26, 2008**

The ornamental design for a shoe, as shown and described.

(51) LOC (9) Cl. 02-99**(52) U.S. Cl. D2/930; D2/933; D2/925****(58) Field of Classification Search D2/896,
D2/916–918, 925–942, 946, 969, 971; 36/1,
36/83, 8.3, 45–58****DESCRIPTION**

FIG. 1 is a right side view of my new, original and ornamental design for a shoe;

FIG. 2 is a left side view thereof;

FIG. 3 is a top view thereof;

FIG. 4 is a bottom view thereof;

FIG. 5 is a front view thereof;

FIG. 6 is a rear view thereof; and,

FIG. 7 is a left front perspective view thereof.

See application file for complete search history.

(56) References Cited

U.S. PATENT DOCUMENTS

D91,894 S * 4/1934 Miller D2/933

1 Claim, 4 Drawing Sheets

H 601
 1/7/10
 RECVD
 DKT1
 DKT2

C01

Fig. 1



Fig. 2



U.S. Patent

Jan. 5, 2010

Sheet 2 of 4

US D607,187 S

Fig. 3

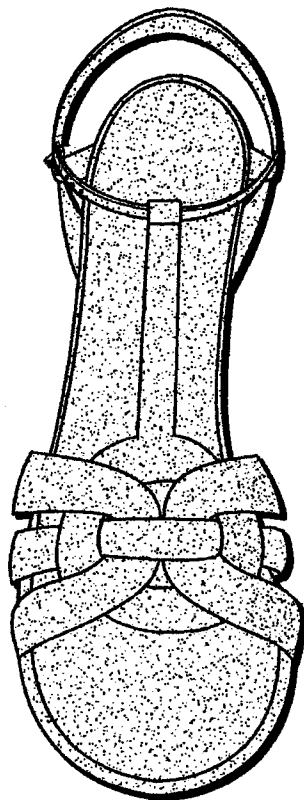
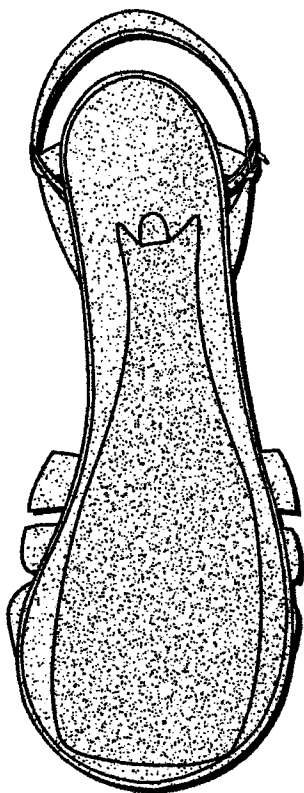


Fig. 4



U.S. Patent

Jan. 5, 2010

Sheet 3 of 4

US D607,187 S

Fig. 5

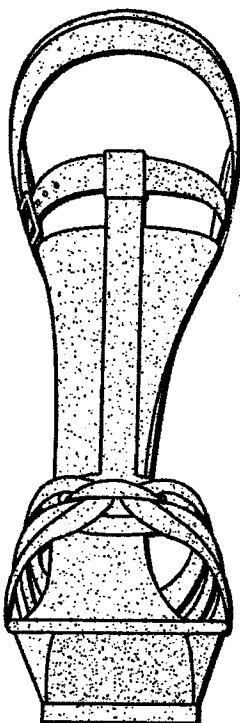


Fig. 6



U.S. Patent

Jan. 5, 2010

Sheet 4 of 4

US D607,187 S

Fig. 7



EXHIBIT B

STEVE MADDEN

WHAT'S NEW WOMEN'S MEN'S HANDBAGS ACCESSORIES SALE CLEARANCE

FREEBIRD BY STEVEN TRENDS SM WORLD

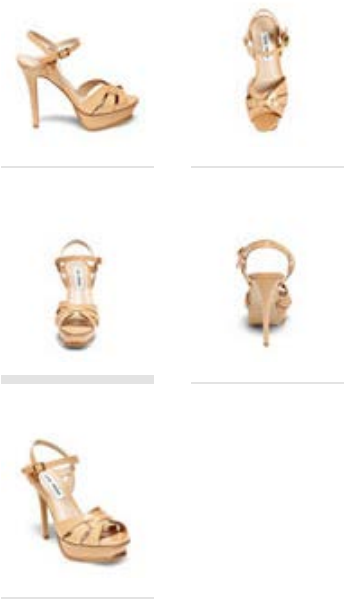
TRENDS / WOMEN'S / NUDES / KANANDA

KANANDA

\$109.95-\$129.95

5.0 (5)

[WRITE A REVIEW](#)



COLOR: BLUSH LEATHER -
\$109.95-\$129.95



SIZE:

Select ▾

QTY:

1 ▾

[LOVE IT!](#) | [FIND IN A STORE](#)

DETAILS

- The stylish KANANDA... Adorable, and simply the perfect addition to your outfit!
- Patent leather upper material
 - Man-made lining
 - Man-made sole
 - 5 inch heel height
 - 1.25 inch platform

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OVER \$50

with code **SMFREE50**
plus everyday free in-store returns

SIZE & FIT



SHIPPING & RETURNS



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\$39.98



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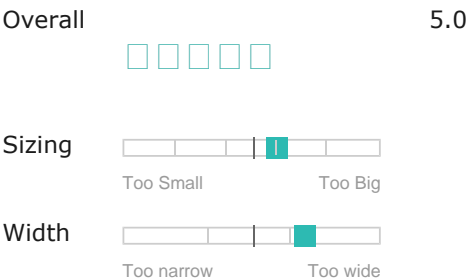
[?]

REVIEWS

RATING SNAPSHOT



AVERAGE CUSTOMER RATINGS



1–4 of 5 Reviews

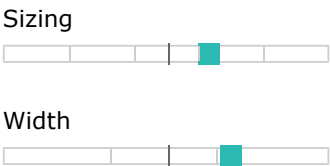
Sort ▼



Didi · 5 days ago

SUPER SEXY, SUPER COMFY!

Spent all day shopping for a comfy neutral heel for a wedding. Finally found these! So comfortable, and so sexy. Only problem was I wanted to buy more. Have a feeling these heels and I are going to best friends this summer! LOL



Date Night/Night Out, Special Occasions

Yes, I recommend this product.

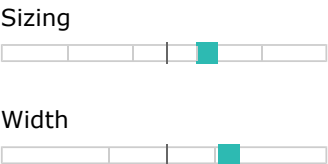
Helpful? Yes · 0 No · 0 Report



□□□□□ Karen808 · 2 months ago

COMFORTABLE AND SEXY

I bought this shoe for my wedding. Wanted something neutral that I could wear again after the event. This shoe was really comfortable and easy to walk in. Great dupe for the YSL but a forth of the price. Highly recommend.



Date Night/Night Out

Stylish, Value, Quality, Comfortable

Yes, I recommend this product.

Helpful? Yes · 2 No · 0 Report



GORGEOUS SHOE

Sizing



Width



Stylish, Value, Quality, Cute, Comfortable



GREAT BUY

Sizing



Width



Stylish, Quality, Cute

Yes, I recommend this product.

Helpful? Yes · 4 No · 0 Report

1–4 of 5 Reviews



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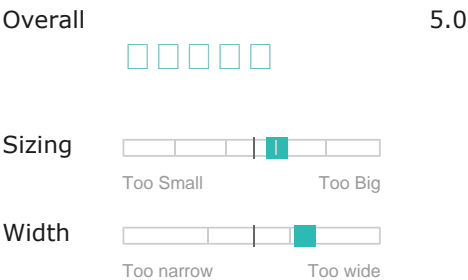
[?]

REVIEWS

RATING SNAPSHOT



AVERAGE CUSTOMER RATINGS



5 of 5 Reviews

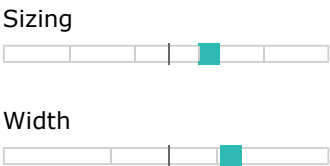
Sort ▼



MaraBoo · 3 months ago

LOVE LOVE THESE SHOES. YOU WON'T BE DISAPPOINTED!

True to size. Great to dress up or down. Even though the heel is high, they're actually very comfortable. I wear them all the time. Had to buy another color!



Wear To Work, Date Night/Night Out, Casual Wear, Special Occasions

Yes, I recommend this product.

Helpful? Yes · 1 No · 1 Report

5 of 5 Reviews



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- RETURN POLICY
- SHIPPING POLICY
- SHOE SIZE CHART
- CLEANING & CARE
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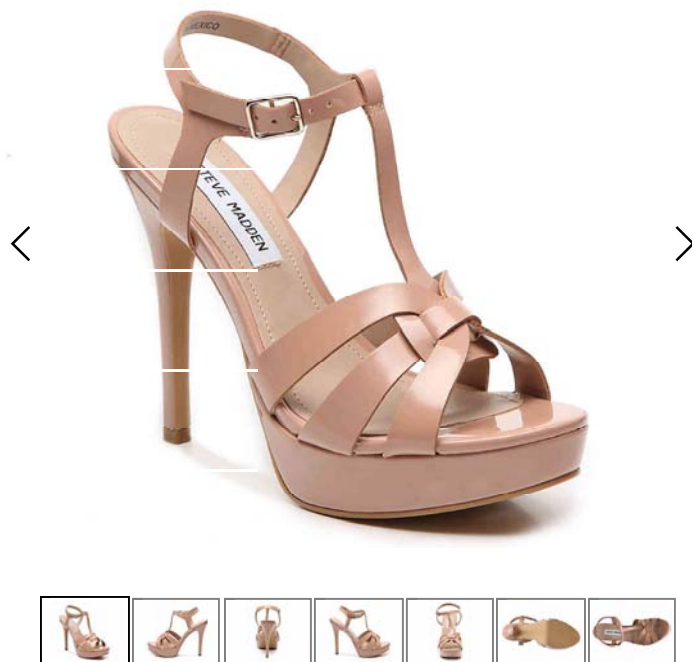
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EXHIBIT E



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--	--	--	--	---



STEVE MADDEN KADRI PLATFORM SANDAL

~~\$69.99~~

\$49.98 -

\$59.98

Comp. value ?
\$100.00

COLOR: MAUVE

Clearance Price: \$59.98



Clearance Price: \$49.98



Size	Width	Qty
Select	Medium	1

What size should I buy?

☐ **FREE STANDARD SHIPPING | Arrives in 4 to 7 Business Days**
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ADD TO BAG

PRODUCT DESCRIPTION

DESCRIPTION

Stay fierce in any outfit with the Kadri sandal from Steve Madden. With a towering stiletto and woven toe strap, this platform sandal will be sure to turn heads.

Item # 427198
UPC # 824095067256

FEATURES

Faux patent leather upper
Adjustable t-strap closure
Round open toe
Faux leather lining
Cushioned footbed

1" platform, 5" covered stiletto
Synthetic sole
Imported

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CUSTOMER REVIEWS

WRITE A REVIEW

Rating Snapshot

Select a row below to filter reviews.

5 ★	5
4 ★	1
3 ★	0
2 ★	0
1 ★	1

Average Customer Ratings

Overall ★★★★★ 4.3

Fit
Runs Short Runs LongWidth
Runs Narrow Runs WideComfort
Not Comfy Very Comfy

1–4 of 7 Reviews

Sort by: Most Recent ▼

★★★★★ Jeannine · 10 days ago

Beautiful Shoes

Love Love these shoes they are amazing and very comfortable.

☑ Yes, I recommend this product.

Fit
Runs Short Runs Long

Width
Runs Narrow Runs Wide

Comfort
Not Comfy Very Comfy

Helpful? Yes · 1 No · 0 Report

★★★★★ Sonia · 2 months ago

Love them!!!!

I bought this shoes a month ago and just love them!!!! I usually wear wedge shoes but this are very comfortable!

☑ Yes, I recommend this product.

Fit
Runs Short Runs Long

Width
Runs Narrow Runs Wide

Comfort
Not Comfy Very Comfy

Helpful? Yes · 1 No · 0 Report

★★★★★ Lulu · 2 months ago

Disappointed

This pair of shoes came in two different size . One was size 6 and the other one was size 8 . Poor quality control .

☒ No, I do not recommend this product.

Helpful? Yes · 0 No · 0 Report

★★★★★ mttt · 5 months ago

Love It

I absolutely love these. They're super cute and comfortable! I have wide feet, so I sized up half a size (i'm normally an 8) and it fit perfectly! The only reason I gave it a 4 star is because I personally thought the heels were kind of slippery...walking in them didn't feel so stable. Other than that, I love love love these and got so many compliments..

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SENT IN 3-4 DAYS.

☑ Yes, I recommend this product.

Fit
Runs Short Runs Long

Width
Runs Narrow Runs Wide

Comfort

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Not Comfy Very Comfy

Helpful? Yes · 3 No · 0 Report

1–4 of 7 Reviews



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SHOES

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(https://image)



(https://image)



(https://image)

MUST GO

360 View | Zoom



Steve Madden Kaiden Heeled Sandals

\$45.00 ~~\$180.00~~

Colour **Black**



(DesktopModules/SportsDirect/ProductDetail/Controls/#)

(DesktopModules/SportsDirect/ProductDetail/Controls/#)

Size

Size guide (https://us.sportsdirect.com/Popup_SizeGuide)

[UK 5 \(DesktopModules/SportsDirect/ProductDetail/Controls/#\)](#)

[UK 5.5 \(DesktopModules/SportsDirect/ProductDetail/Controls/#\)](#)

[UK 6 \(DesktopModules/SportsDirect/ProductDetail/Controls/#\)](#)

[UK 6.5 \(DesktopModules/SportsDirect/ProductDetail/Controls/#\)](#)

Quantity

1

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Sign in to add to wishlist (/Login?addto=wishlist&returnurl=%2fsteve-madden-kaiden-heeled-sandals-239061)

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+ [Outlet \(/outlet\)](#) > [Flip Flops and Sandals Outlet \(/outlet/flip-flops-and-sandals-outlet\)](#)

+ [Ladies \(/ladies\)](#) > [Footwear \(/ladies/footwear\)](#)

+ [Ladies \(/ladies\)](#) > [Ladies Sandals and Sliders \(/ladies/ladies-sandals-and-sliders\)](#)

+ [Sale \(/sale\)](#) > [Shoes \(/sale/shoes\)](#)

[Product Info](#)

[Delivery](#)







[Returns](#)

Kaiden Heeled Sandals by Steve Madden

- > Heeled sandals
- > Patent
- > Platform sole
- > 5 inch stiletto heel
- > Cushioned foot bed
- > Buckle fastened ankle strap
- > Open toe
- > Strappy fore foot
- > Steve Madden branding
- > Upper ; Leather
- > Lining : leather
- > Sole : synthetic

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Product code: 239061

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SoulCal 2 Zip Bubble Jacket Mens ./soulcal-2-zip-bubble-jacket-mens-608669?colcode=60866922&pr=1		Firetrap Rhino Boots ./firetrap-rhino-boots-118066?colcode=11806603&pr=1	
\$48.00 \$97.50		\$67.50 \$134.99	
	./lee-cooper-full-zip-hoody-mens-539021?colcode=53902103&pr=1		./calvin-klein-365-2-pack-trunks-422065?colcode=42206503&pr=1
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\$11.99 RRP \$59.99		\$29.99 \$44.99	
	./calvin-klein-boxer-briefs-422125?colcode=42212503&pr=1		./soulcal-two-zip-bubble-jacket-ladies-660168?colcode=66016822&pr=1
Calvin Klein Boxer Briefs ./calvin-klein-boxer-briefs-422125?colcode=42212503&pr=1		SoulCal Two Zip Bubble Jacket Ladies ./soulcal-two-zip-bubble-jacket-ladies-660168?colcode=66016822&pr=1	
\$18.00 \$29.99		\$48.00 \$97.50	

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[Ladies Trainers \(/ladies/trainers\)](/ladies/trainers)
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[Women's Running Clothing \(/running/running-clothes/womens-running-clothes\)](/running/running-clothes/womens-running-clothes)

V31

Shopping

[My Account \(/accountinformation\)](/accountinformation)
[Delivery \(/customerservices/deliveryinfo\)](/customerservices/deliveryinfo)
[Pre-Orders \(/customerservices/gettingstarted/pre-orders\)](/customerservices/gettingstarted/pre-orders)
[Ways To Pay \(/customerservices\)](/customerservices)
[Size Guide \(/customerservices/otherinformation/sizeguide\)](/customerservices/otherinformation/sizeguide)
[Order History \(/customerservices/otherinformation/orderhistorysummary\)](/customerservices/otherinformation/orderhistorysummary)
[Returns \(/customerservices/completedorders/returnsandexchanges\)](/customerservices/completedorders/returnsandexchanges)
[Find A Store \(/stores\)](/stores)

Help

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Fit

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Width

Runs Narrow Runs Wide

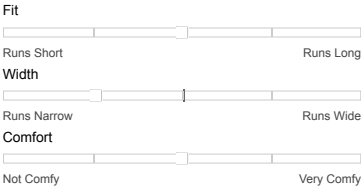
Helpful? Yes · 1 | No · 0 Report

★★★★★ TLN17 · 2 months ago
Very pretty

Bought these in my usual sandal size, 7.5, and in coral. They feel slightly tight and the upper part is not as soft as I would like. I will keep them and see if I can break them in a bit.

☑ Yes, I recommend this product.

Helpful? Yes · 0 | No · 0 Report



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STEVE MADDEN

Steve Madden Women's Sicily Sandal,

2 customer reviews

Price: \$26.98 - \$59.95
& Free Return on some sizes and colors

Size:

Select

[Size Chart](#)

Color: Black Leather

- Leather
- Imported
- Rubber sole
- Slip on design
- Man made lining

Roll over image to zoom in

2,219

Ad feedback

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52

\$24.00 ✓prime

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Steve Madden
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Steve Madden Women's
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8
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Sandal (11, Black-503)
80
\$9.99



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Alice Sandal, Natural Multi,
6 M US
4
\$59.99



Comfity Sandals for
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Strappy Block Heels
Slingback Gladiator Sh...
52
\$31.89



Steve Madden Women's
Kirsten Wedge Sandal,
Natural Leather, 6 M US
27
\$89.95

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Sam Edelman Women's
Bay Slide Sandal,
43
\$30.39 - \$100.00



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7
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Product description

The timeless appeal of a classic sandal gets an upgrade in the sicily sandal. Perfect with all your favorite warm weather outfits.

What began as a modest \$1100 investment in 1990 has developed into one of the most iconic brands in footwear. From a factory in Queens, NY, Steve Madden has revolutionized the shoe industry, merging years of experience with unique and creative designs. Inspired by rock and roll and his New York roots, his vision to provide on-trend women and men with an outlet to express their individuality is innovative, daring, and inspiring. Steve's innate understanding of trends and unparalleled willpower have resulted in millions of customers worldwide and propelled his designs to the forefront of fashion. He has expanded the Steve Madden brand into a true lifestyle and destination for footwear, handbags and accessories, sold in over 80 countries worldwide. It's about authenticity. It's about embracing individuality. It's Steve Madden.

Shipping Weight: 6.1 ounces (View shipping rates and policies)

ASIN: B07BKKJP3W

Item model number: SICI01S1

Date first listed on Amazon: April 9, 2018

Domestic Shipping: Currently, item can be shipped only within the U.S. and to APO/FPO addresses. For APO/FPO shipments, please check with the manufacturer regarding warranty and support issues.

International Shipping: This item is not eligible for international shipping. [Learn More](#)

Amazon Best Sellers Rank: #189,323 in Clothing, Shoes & Jewelry (See Top 100 in Clothing, Shoes & Jewelry)


#3667 in [Clothing, Shoes & Jewelry](#) > [Women](#) > [Shoes](#) > [Sandals](#)

#99201 in [Clothing, Shoes & Jewelry](#) > [Women](#) > [Shops](#)

Average Customer Review: [2 customer reviews](#)

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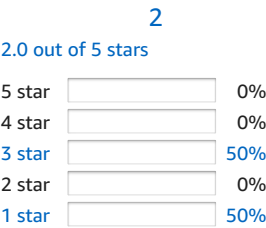
				
Nine West Women's Fields Leather Dress Sandal, Black, 8 M US	Birkenstock Arizona Birko-Flo Mocha Sandals - 28 EU(10-10.5 M US Toddler)	Surf Buckle Sandal, Natural PU, 8.5 B(M) US	Comfity Sandals for Women, Rivets Studded Strappy Block Heels Slingback Gladiator Sh...	Sanuk Women's Yoga Gora Gora Sandal, Natural, 08 M US
38	415	581	52	117
\$78.95	\$59.95	\$35.00	\$54.89	\$44.00

Ad feedback

Customer Questions & Answers

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Customer reviews



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Amazon Customer

Great style, too narrow

September 1, 2018

Size: 9 M US Color: Cognac Leather **Verified Purchase**

Really cute sandal, but extremely narrow fit.

Helpful Comment Report abuse

Search customer reviews

Search

Tori Maxfield

One Star

July 4, 2018

Size: 9.5 M US Color: White Leather **Verified Purchase**

Too narrow returning them.

Helpful Comment Report abuse

See both reviews

Write a customer review

Customers also considered



Steve Madden Women's Donddi Sandal

622

\$45.59 - \$59.95



Steve Madden Women's Stecy Dress Sandal

468

\$19.99 - \$99.00



Steve Madden Women's Irenee Heeled Dress Sandal

168

\$47.97 - \$148.00



Steve Madden Women's Softey Flat Slide Sandal

303

\$11.50 - \$60.00



Steve Madden Women's Agathist Sandal

146

\$37.89 - \$59.95



Steve Madden Women's
Feliz Dress Sandal,
391
\$12.70 - \$69.95

Ad feedback

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Steve Madden
Sicily Leather Sandals

Item #05382884

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SIZE			SIZE CHART
6.5M	7M	7.5M	
8M	8.5M	9M	

COLOR

Color

QUANTITY

1

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DESCRIPTION ×

From Steve Madden, Sicily Leather Sandals feature:

- Leather upper
- Slip on style
- Synthetic lining
- Synthetic outsole
- Approx. 0.25" heel height

Imported.

DMS: 0634 508 SICILY

SHIPPING AND RETURNS +

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SHOEFAN REWARDS
(/INFO/REWARDS)**Steve Madden Sicily Sandal (Women's)****STEVE MADDEN** (/steve-madden/category_5099)

Customer rating:

★★★★★ (0)

[View Questions & Answers](#)[View entire brand \(/steve-madden/category_5099\)](#)

Hover above to zoom

SIZE: Select a Size

- [5.5](#)
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- [6.5](#)
- [7](#)
- [7.5](#)
- [8](#)
- [8.5](#)
- [9](#)
- [9.5](#)
- [10](#)

WIDTH: M (Regular) Select a Width

[M \(Regular\)](#)

COLOR: Black Leather Select a Color

- [\\$39.99](#)
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The Steve Madden Sicily Sandal gives an upgrade to a timeless classic. This sandal pairs perfectly with all your favorite warm weather outfits.

- Classic silhouette
- Flat heel

Heel Height: 1/4"**Fit:** True to Size**Insole:** Leather**Outsole:** Rubber

Imported

Customers also viewed



Customer Reviews
Questions & Answers

**O'Neill
Ventura Slide**
(/oneill-ventura-
slide/841239/1854326?
cm_vc=bn_pdp_carou_loc1)



**Steve Madden
Dasha Flat Sandal**
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**FitFlop
Cha Cha Thong Sandal**
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sandal/733022/1518758?
cm_vc=bn_pdp_carou_loc1)

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Leera Wedge Sandal**
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cm_vc=bn_pdp_carou_loc1)

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cm_vc=bn_pdp_carou_loc1)

★★★★★

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ASK A QUESTION

lamtheonlykat · 25 days ago

How is the fit on these sandals. Narrow or wide? And are they true to size?

0
answers

Answer this Question

Steve Madden Sicily Sandal

Brand: Steve Madden

Style: Sicily Sandal

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- [Women's Flat Sandals \(/womens-flat-sandals/category_907817\)](/womens-flat-sandals/category_907817)

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Premium Brands from *Steve Madden*

Steve Madden

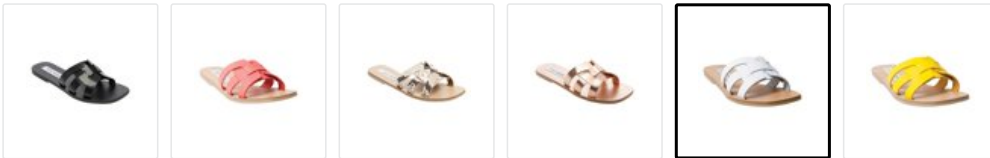
Women's Steve Madden Sicily Sandal

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1 of 6

Color: White Leather



Shoe Size: Choose an option

[Size guide](#)

10	7.5	8.5	9.5	6	6.5	7	8	9
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\$39.99

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The Steve Madden Sicily Sandal gives an upgrade to a timeless classic. This sandal pairs perfectly with all your favorite warm weather outfits. Classic silhouette Flat heel. Women's Steve Madden Sicily Sandal

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Steve Madden

Steve Madden Sicily Leather Flats – White~~\$59.99~~ **\$30.00**

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SKU: 2823854319

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DETAILS

- Durable leather upper
 - Open-toe silhouette
 - Slip-on style
 - Soft and comfy synthetic lining
 - Man-made sole
 - Robust rubber outsole
 - Heel height 0.25"
- Look chic and relaxed every time you step out wearing the Steve Madden Sicily leather flats for women. Flaunt this versatile footwear with just any casual attire for the cool and confident feeling.

- Style Name: SICILY-WHT

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