

EXHIBIT C

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF LOUISIANA

Filed Under Seal

WORLD WRESTLING
ENTERTAINMENT, INC.,

Plaintiff,

vs.

VARIOUS JOHN AND JANE DOES,
and VARIOUS XYZ CORPORATIONS,

Defendants.

Civil Action No.:

CERTIFICATION IN SUPPORT OF EX PARTE MOTION FOR TEMPORARY RESTRAINING ORDER; ORDER FOR SEIZURE OF COUNTERFEIT MARKED GOODS; AND ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE

I, Raymond G. Areaux, hereby certify as follows:

1. I am a partner with Carver, Darden, Koretzky, Tessier, Finn, Blossman & Areaux, LLC, attorneys for Plaintiff World Wrestling Entertainment, Inc. ("WWE") in connection with the above-captioned action. I submit this Certification pursuant to Fed. R. Civ. P. 65(b) in support of WWE's ex parte Motion for a Temporary Restraining Order without notice to Defendants.

2. WWE has filed this action for inter alia, trademark counterfeiting in violation of 15 U.S.C. § 1116(d) and is seeking an ex parte Temporary Restraining Order, an ex parte Seizure Order and an order to show cause why a preliminary injunction should not issue.

3. WWE seeks to restrain Defendants from distributing, offering to sell, and selling goods bearing counterfeit marks in the vicinities of the venues in which WWE's Wrestlemania[®] XXX weekend events in the New Orleans, Louisiana area, from April 3 to April 7, 2014 shall be occurring, including, but not limited to, (1) WWE's Wrestlemania[®] Axxess event at the New Orleans Convention Center from April 3 to April 6; (2) WWE's Hall of Fame event at the

Smoothie King Center on April 5; (3) WWE's Wrestlemania[®] XXX event at the Mercedes-Benz Superdome on April 6; and (4) WWE's Monday Night Raw event at the Smoothie King Center on April 7.

4. WWE believes based upon past experience that, if notified of the pendency of this Action and the nature of the relief sought, the Defendants will conceal or relocate their goods bearing counterfeit marks outside the jurisdiction of this Court. *See* Declarations of Richard Hering and of Lauren Dienes-Middlen and the verified Complaint. Such behavior would make it extremely difficult if not impossible for WWE to obtain relief. *Id.*

5. This action has been commenced against unnamed Defendants who do exist but cannot be identified until the Wrestlemania[®] XXX weekend events occur and who are more likely than not to be at or around the New Orleans Convention Center, Mercedes-Benz Superdome and Smoothie King Center in New Orleans, Louisiana during WWE's Wrestlemania[®] XXX weekend from April 3 to April 7, 2014. *Id.* There is no way to provide formal notice of the pendency of this Action to such unnamed Defendants or WWE's request for a Temporary Restraining Order, because the identity and whereabouts of the Defendants are presently unknown to WWE.

6. If Defendants are permitted to engage in trademark counterfeiting, WWE will be irreparably harmed because it will suffer (a) irrecoverable loss of sales of legitimate marked goods in undeterminable quantities and (b) loss of reputation and goodwill through the sale by Defendants of unauthorized goods of inferior quality. *Id.* This irreparable harm can be prevented only through the issuance of an ex parte order.

7. No person's legitimate interests will be harmed by the issuance of an ex parte Temporary Restraining Order.

8. WWE has not publicized this action or the nature of the relief sought.

9. Pursuant to 15 U.S.C. § 1116(d)(2), WWE is giving notice to the United States Attorney for the Eastern District of Louisiana that it is filing the above captioned action under seal at the office of the Clerk of the United States District Court for the Eastern District of Louisiana, and thereupon seek an Ex Parte Order for seizure of counterfeit goods as provided by the Lanham Act.

10. At the hearing to show cause, WWE expects to provide the Court with a declaration that the counterfeiting Defendants (whose names will be provided) have been served with the order and the summons and complaint in this action.

I certify under penalty of perjury that the foregoing statements are true and correct.

Executed on March 25, 2014.



Raymond G. Areaux (#16792) (T.A.)

Carver, Darden, Koretzky, Tessier,

Finn, Blossman & Areaux, LLC

Energy Centre, Suite 3100

1100 Poydras Street

New Orleans, LA 70163

Office Phone: (504) 585-3803

Cellular Phone: (504) 383-3803

Facsimile: (504) 585-3801

Email: Areaux@carverdarden.com