



**COURT OF MILAN**

**APPEARANCE AND ANSWER CONTAINING PRELIMINARY MOTIONS**

**PURSUANT TO ART. 183, COMMA 6, C.P.C .**

**(PROC. N. 50660/2019 R.G. - DOCTOR BORONI)**

In the interest of defendants

**LINDSEY SCHUYLER**, residing in \_\_\_\_\_, New York (U.S.A.), n. passport \_\_\_\_\_, and **TONY LIU**, residing in \_\_\_\_\_, New York (U.S.A.), n. passport \_\_\_\_\_, represented and defended by attorneys Marco Amorese (CF MRLC77A10A794B) (email: avvmarcoamorose@bergamo.pecavvocati.it - fax 035271110) and Anna Orofino (CF RFNNA89A63A794N)(email: anna.orofino@bergamo.pecavvocati.it - fax 035271110), (both of the Foro di Bergamo and with offices in Bergamo (BG), via Zambianchi n. 3, and electively domiciled office of the same, with the right power of attorney attached to this action,

- defendants -

**AGAINST**

plaintiffs **DOLCE & GABBANA S.R.L .** (C.F. and P.IVA 09297890155), **DOLCE & GABBANA TRADEMARKS S.R.L.** (C.F. and P.IVA 05817370967) and **STEFANO GABBANA** (C.F. GBBSFN62S14F205S), with attorneys C. Ferdinando Emanuele and Francesca Gesualdi

- plaintiffs -

1. **THE DIET SODA LL.C.** is the company founded by Tony Liu and Lindsey Schuyler that manages the website [www.dietprada.com](http://www.dietprada.com) and the Instagram account @DietPrada.
2. Diet Prada was born in 2014 with the idea of being a forum for commenting on the lack of originality in the world of fashion. It quickly becomes a new *media-brand* known for its frank approach in dealing with important issues in the sector and beyond.
3. Diet Prada soon stands out for its ability to highlight themes such as racism, cultural appropriation, misogyny, sexual harassment, and any topic affecting the fashion sector and its role in society.
4. Diet Prada earns a large number of readers for its ability to question even uncomfortable topics without sparing any fashion manufacturer and/or *designer* the need to respond on such delicate and general interest issues.
5. The fundamental idea is that, by amplifying issues dear to different types of communities and social classes, Diet Prada manages to stimulate the fashion sector so that the latter complies with a higher level of originality and ethical standards.

6. In particular, Diet Prada stands out for its coverage of the traditional attitude of leading fashion brands to exclude BIPOC individuals (acronym for "Black Indigenous People Of Color") and for calling attention to accounts of these issues.

7. By giving space on its platform to issues important to these racial and other marginalized groups, Diet Prada has had the ability to turn the attention of the general public to stories that are often ignored by the mainstream press.

8. With a primarily female audience, Diet Prada has highlighted the ways in which a predominantly male-dominated approach in the fashion field was able to perpetuate misogynistic behaviors that widely characterize the typical patterns reproduced in the fashion sector.

9. Thanks to the amplification of certainly important issues, Diet Prada has been able to contribute to a greater consumer sensitivity aimed at allowing them to align their purchasing choices with their values and beliefs and to stimulate a greater awareness of the brands in the sector in promoting more modes of production sensitive to inclusion issues, originality, and ethics.

10. In particular, the Instagram account started its work as a chronicle comparing designers from the world of fashion and denouncing plagiarisms or even similarities between their creations. Over time it has turned into an original voice with the aim of providing thoughtful observations to its readers thanks to effective and transversal communication (doc. 1 - post DP).

11. By amplifying highly topical issues and giving media echo to behaviors that morally unethical or controversial, Diet Prada seeks to contribute and has contributed to stimulating the fashion industry to maintain higher creative and moral standards by protecting creativity and promoting greater integrity within the sector. There are multiple examples of this important influential role.

12. On one occasion, the denunciation of Gucci's appropriation of the iconic patterns of the designer New Yorker Dapper Dan, the Fiesole fashion house began a fruitful collaboration with the same thanks to which he gave new visibility to his brand and restarted his atelier in Harlem (doc. 02.01, 02.02 - Article Quartz ita. / eng.).

13. On another occasion, Diet Prada echoed the fact that Prada's and Gucci's products recalled the satiric and traditionally racist stereotype of *blackface* and this led these brands to create committees on diversity and inclusion (doc. 03.01, 03.02 - Article Prada ita / ing; doc. 04.01, 04.02 Article Gucci ita / ing).

14. The commitment to promote an open and inclusive fashion sector was accentuated after the public protests triggered by the killing of George Floyd and by facing the anti-Asian and xenophobic feelings triggered by the Covid-19 pandemic and the racist rhetoric that had characterized the Trump administration (which on several occasions defined Covid-19 as *China-virus* or *Kung-flu*) (Doc. 07 article Donald Trump).

15. This sensitivity and attention helped to expand the number of website readers and followers of Diet Prada's Instagram account.

16. Today, Diet Prada relies on a number of readers clearly coming mainly from English-speaking countries and in particular from the United States, Great Britain, and Australia (doc. 05 - visitor files).

17. In essence, Diet Prada pursues the public intent to denounce deficiencies in originality, plagiarism, and ethically incorrect behavior of fashion houses so as to allow consumers to know the real values pursued by the *atelier* and to increase their awareness.

18. Diet Prada, in particular, has shown particular attention to the issue of racism, which Diet Prada has always condemned in all its manifestations: the company has in fact taken a position on the occasion of the death of George Floyd and on Donald Trump's racist rhetoric, and these efforts have been recognized and supported by several celebrities, influencers, actors, supermodels, politicians, and activists who have always been committed to defending human rights.

19. Even with specific reference to the present plaintiffs, as will be seen, Diet Prada has not fomented hatred towards them or boycotted the brand in any way. The company, in fact, limited itself to stigmatizing some public positions deemed (explicitly or implicitly) discriminatory taken both by Dolce & Gabbana and by its founder, Stefano Gabbana.

20. Contrary to what the other party would like to believe, in fact, Diet Prada has never started or pursued a hate campaign against today's defendants but has continued to exercise its free press rights, signaling (as with any other large fashion house) any deficiencies in originality, similarities, or evident references to the production of other fashion houses.

21. The complaints made by Diet Prada have in other instances had positive effects: in fact, they have induced some fashion houses that had taken positions that could be perceived as racist to apologize publicly and to promote collaborations testifying to the commitment to diversity, also through the recruitment of people from different countries with the aim of introducing true forms of diversity policy.

22. Dolce & Gabbana is a brand active since the eighties founded by the stylists Domenico Dolce and Stefano Gabbana who has had great success abroad where it concentrates the prevalence of its economic activities.

23. Dolce & Gabbana is today an internationally branched global brand that uses multiple subsidiaries also in the United States (doc. 56, doc. 57, doc. 58, doc. 59).

24. Dolce & Gabbana S.r.l. with a sole shareholder (the parent company is Dolce & Gabbana Holding S.r.l.) has an annual production value of around one billion euros and is divided into various investee companies branched out in many jurisdictions (doc. 57 - Dolce & Gabbana S.r.l.).

25. Based on the balance sheet values, only about 20% of the value of production is attributable to activities related to Italy.

26. Most of the value of production is produced abroad and, among the various subsidiaries, the most valuable stake is Dolce & Gabbana U.S.A. Inc. which also forms the subsidiary where most of the sales of Dolce & Gabbana products are located, as also emerges from the last filed financial statements of the holding company (see. p. 431 s.s. doc. 57 - Historical file Dolce & Gabbana S.r.l.).

27. Dolce & Gabbana U.S.A. Inc. has perfect patrimonial autonomy and, despite being 100% controlled by Dolce & Gabbana S.r.l., constitutes an autonomous subject. Intercompany relationships are regulated with purchases and disposals between the parent companies and the subsidiaries and, as emerges from the supplementary notes filed, the supply relationship between the Italian company and the US sister company has necessitated the use of transfer pricing compliance programs and the assumption of agreements with the American tax authorities.

28. With reference to the China and Asia sector, the activities are developed by two autonomous and independent companies - albeit controlled by Dolce & Gabbana S.r.l. - called Dolce & Gabbana Hong Kong and Dolce & Gabbana Shanghai (v. p. 66 doc. 56 - Holding historical file). 29.

Dolce & Gabbana S.r.l., as mentioned, is in turn controlled by

Dolce & Gabbana Holding S.r.l., extraneous to today's judgment (see. p. 66 doc. 56 - Holding historical file).

30. At group level, it appears that only 20% of revenues and sales of the products are connected to Italy, while 21% are connected to America.



31. The multinational nature of the group allowed the implementation of real group tax policies. In particular, the Group's tax management was characterized by particularly aggressive tax policies which over the years have led to multiple disputes with the tax offices of multiple jurisdictions (see. p. 85 doc. 56 - Historical file Holding).

32. Beyond the well-known story that had originally led to the criminal conviction of Messrs. Domenico Dolce and Stefano Gabbana, the Group has implemented and continues to implement tax policies that have subjected it to multiple tax assessments, as emerges from the explanatory note attached to the same historical file of the holding company (v. p. 83 and s.s. doc. 56).

33. Dolce & Gabbana S.r.l. in fact, acknowledges that several Group companies have undergone various investigations relating to the ineductibility of assets, acquisitions of intangible assets, registration taxes, undue deduction of VAT, and transfer pricing, with reference to which the companies have taken steps to challenge, to propose facilitated definitions or agreements with the tax offices of multiple jurisdictions (see. p. 366 s.s. doc. 56).

34. A fundamental part of the stylistic-entrepreneurial history of the Dolce & Gabbana Group is a widespread use of a largely sensual, often extreme imagination that exploits dubious notions of gender dynamics in order to strike the attention of the public.

35. For example, in 2007, the Dolce & Gabbana brand had been criticized for an advertising campaign in which a man was shown who immobilized a woman on the ground holding her by the wrists in front of the indifferent looks of other men (doc. 10.01 - advertising 2007, doc. 10:02

- Article advertising 2007).

36. The accusations made against the fashion house stemmed from the fact that the scene represented in the spot clearly evoked the scene of a rape and, in any case, represented an offense and humiliation against women.

37. Still, in 2012, Dolce & Gabbana started a collaboration with the star Madonna, owner of the company named "Boy Toy Inc.", as a result of which it created a line of clothing in which the "D&G" brand was associated with "Toy Boy Inc." (Doc. 11 - Boy Toy shirt photo).

38. In 2015, moreover, the present plaintiffs defined children born from in vitro fertilization as "synthetic" beings and they took sides against the adoption of children by homosexual couples (doc. 33.01, doc. 33.02 - article homosexual couples ita / eng).

39. The direct consequence of these latest statements was that a large group of famous people distanced themselves from the Dolce & Gabbana brand (Elton John declared on that occasion that he would never wear D&G brand clothes again).

40. In particular, Elton John and Jamie King took sides publicly against the company (doc. 13 - photos Elton and King).

41. In 2018, Dolce & Gabbana organized a world event in Shanghai called "Great Show".

42. In order to promote this event, Dolce & Gabbana had created a promotional spot to spread on Chinese social platforms where a Chinese model was represented at the table, intent on tasting typical dishes of traditional Italian cuisine with the help of wooden chopsticks commonly used in Asia instead of Western cutlery.

43. The spot was immediately criticized for representing a retrograde China, whose appeal was strengthened through the use of ancient music, furnishings, and obsolete colors.

44. In the end, this spot also became malicious because the model, having arrived at the dessert, was represented in evident difficulty after she was served a huge Sicilian cannolo that she tried to eat strictly with chopsticks.

45. At that moment, an off-screen voice asked, with an allusion that was felt as highly sexual, "is it too big for you?" (Doc. 14 - photo cannolo Great Show).

46. The dissemination of this video provoked a firm and indignant reaction among the majority of Chinese public opinion, which was deeply disheartened by the stereotypical, sexist and racist cultural message that characterized the video (doc. 06.01, 06.02, 06.03, 06.04, 06.05 - Great Show Articles).

47. The choice to subject a female model to a strong sexual allusion appeared to the Asian culture to which it was addressed, in which many perceive mention of sex as taboo, an unacceptable sexist and humiliating message. The optics taken from the video, in fact, recall stereotypes of the Asian woman as a sexual object (while clearly alluding to further stereotypes that portray Asian people with more minute sexual organs).

48. These allusions certainly appeared dissonant with a public debate that had long since highlighted the relationship between the transmission of sexist tropes and the perpetuation of phenomena of gender-based violence. In 2016, the National Network for the end of domestic violence reported that *"The hyper-sexualized narrative leads to sexual objectification and violence. Daily racism and sexism towards Asian women leads to deadly results, since dehumanization creates a climate that makes violence excusable or acceptable: 41 to 61 percent of Asian women report having suffered physical or sexual violence from a partner during their lifetime. This is significantly higher than any other ethnic group). "*

49. News of the widespread and radical discontent that was circulating in China was first brought to light by the Shanghai-based CMR research group.

50. The CEO of the CMR group, Shaun Rein, on the occasion of the release of the Dolce & Gabbana promotional video designed to promote "Great Show," declared: "*This D&G campaign is poorly conceived and stupid at best. In the worst case it could damage or even destroy the brand*" (Doc. 06.01).

51. Shaun Rein had addressed the issue after receiving strongly negative reactions on the occasion of the dissemination of the advertising video campaign.

52. Chinese consumers, in fact, had reacted angrily to watching the promotional video, interpreting its contents as a mockery of their culture and their people.

53. As proof of this, the fact that the present plaintiffs withdrew the video which, however, had become viral and had created great discontent in the Chinese people.

54. On that occasion, Stefano Gabbana let loose with comments offensive to the Chinese people in an exchange of messages published online (not from *Diet Prada*) and reposted by many users, declaring that in subsequent interviews he would not fail to highlight the ignorance that distinguishes them – in his opinion.

55. "*Great Show*" was canceled and several Chinese e-commerce platforms decided not to offer Dolce & Gabbana products.

56. Probably at least partially realizing the offensive nature of the video and its statements, Stefano Gabbana, instead of apologizing and acknowledging having given voice to a message that is at least seriously inappropriate, stated that the conversations published by some on the web did not come directly from him, but they were the result of his Instagram account being hacked (doc. 08 - post hacking).

57. With the present summons, on the other hand, we learn that he actually stated in the exchange with other users of the network that China is a country of [five emoticons representing excrement] and that the same is nothing but "*ignorant dirty smelly mafia*" (Doc. 15 - post Great Show).

58. Without anticipating arguments to be examined *infra*, it seems evident from the contrasting behavior of a public figure responsible for a very important fashion house that this exchange of online ideas posted by other web users had an obvious news interest, especially since Dolce & Gabbana boasts an ethical code that affirms respect for racial diversity (doc. 09 - D&G code of ethics).

59. The statement that this exchange (however posted by third parties) can be covered by authorial protection seems invalid, both due to the absolute lack of originality and due to the certain lack of confidentiality deriving from the chosen medium.

60. On the other hand, since the beginning of his career, Stefano Gabbana, in addition to being undoubtedly a public figure, has distinguished himself for his controversial, at times transgressive, statements which have contributed to increasing his notariety and that of the brand he represents.

61. Already in 1998, in fact, the designer initiated a sharp clash with the star Jenny McCarthy on the occasion of the MTV VMAs (doc.

16.01, 16.02, 17.01, 17.02 articles Jenny McCarthy MTV 1998).

62. At least since the early 2000s, Stefano Gabbana himself, together with Domenico Dolce, has been associated by various media with so-called "Rent boys" and cruising environments in articles describing some trends related to the LGBT world (NYM 13.09.2000) (doc. 18 -

Article 2002), also due to the use of promotional campaigns that exploited questionable gender tropes. This association continued and was taken up by multiple media outlets around the world. For example, in 2014, *The Independent* in Ireland published an article where, speaking of the fashion of worn jeans, it stated: "now it just tends to look like a *rent boy* in an advertisement by Dolce and Gabbana from the eighties" ("*Now, it just tends to look like a rent boy in a Dolce & Gabbana ad from the 1980s*") (Doc. 12.01, 12.02 - Independent article).

63. The same, on the other hand, have widely used their image as a successful gay couple to promote themselves and their fashion house using sometimes deliberately captivating gender stereotypes.

64. The controversies sparked by public positions taken, in particular, by Stefano Gabbana are well known.

65. In 2017, for example, Stefano Gabbana was accused of "body shaming" for his claims against pop star Lady Gaga (Doc. 19.01, 19.02, 20.01, 20.02, 21.01, 21.01, 22.01, 22.02 - articles on Lady Gaga ita / ing).

66. In 2018, the Dolce & Gabbana designer was heavily criticized on the web for the comment "*it's really ugly*" left under a photo that portrayed the young singer-actress Selena Gomez wearing a series of red dresses and for the offensive answers to other comments made under the same post (doc. 23 - post on Selena Gomez).

67. Gabbana's aforementioned comments sparked a series of outraged responses from many users who described his behavior as "disgusting" and "disrespectful," defining the fact as an episode of "online bullying" (Doc. 24.01, 24.02, 25.01, 25.02, 26.01, 26.02, 27.01, 27.02, 28.01, 28.02 - articles on Selena Gomez ita / eng).



68. On this occasion, several famous people, including Tommy Dorfman and Julia Michaels, took the side of Gomez describing the designer as a "homophobe" and "misogynist" and condemning him for such "body-shaming".

69. The stylist didn't even spare the fashion blogger Chiara Ferragni on her wedding day, mocking her and describing her wedding dress as "cheap" (Doc. 29.01, 29.02, 30.01, 30.02, 31.01, 31.02 - Articles on Chiara Ferragni ita / eng).

With this action, Lindsey Shuyler and Tony Liu are brought to trial *ut supra* represented and defended, contesting everything *ex adverso* alleged, produced and pleaded, in order to state the following:

## **1. Standing**

### **1.1. Lack of Standing to be sued: Tony Liu and Lindsey Schuyler lack standing to be sued.**

The lack of standing to be sued or bring an action may be declared *ex officio* by the Court, at any stage of the proceeding, if the proceeding file shows (cf. Cass. civ., Sec. U, sentence no. 2951 of February 16, 2016; Cass. civ., Sec. III, ord., May 15, 2018, n. 11744) and, therefore, can be validly raised here. Likewise, any private writing produced may legitimately be repudiated in the first defense action. (Cass. civ. Sec. III Ord., 10/10/2017, n. 23669).

As mentioned, Diet Prada is a website and an Instagram account owned and managed by THEDIETSODA LLC and, therefore, today's defendants are radically devoid of passive ownership and deny that

the posts subject to judgment are attributable to them being rather attributable to TheDietSoda L.L.C. It is strongly disputed that the posts or declarations of which the actors complain of the offensiveness are personally attributable to today's defendants, a circumstance which must be rigorously tested. Therefore, the application to today's defendants will have to be rejected.

**1.2. The lack of active standing: the parties have no active standing. The allegedly damaged companies are Dolce & Gabbana U.S.A. Inc. and, at most, Dolce & Gabbana Hong Kong and Dolce & Gabbana Shanghai subsidiaries that are located in the jurisdiction where the facts of this dispute occurred.**

Moreover, the plaintiffs have not even shown that they hold the subjective

position for which protection is requested. In fact, for the reasons that will then be more widely explained below, any damage (actually non-existent) would have been suffered by the subsidiaries

- but having different legal personality and perfect patrimonial autonomy - established in the countries where Diet Prada is read.

Therefore, the present plaintiffs do not have active standing which must, if

anything, be recognized by Dolce & Gabbana U.S.A. Inc., Dolce & Gabbana Hong Kong and Dolce & Gabbana Shanghai. Today's actors could at most complain of indirect damage not susceptible to judicial protection.

**2. DEFECT OF JURISDICTION IN FAVOR OF THE COURT OF THE STATE OF NEW YORK OR, IN THE ALTERNATIVE, OF THE COURT OF SHANGHAI: THE ITALIAN COURT DOES NOT HAVE THE AUTHORITY TO ADJUDICATE THE FORMULATED QUESTION. THE ALLEGED UNLAWFUL ACT WAS COMMITTED IN NEW YORK AND THE EVENT'S EFFECTS WERE OUTSIDE ITALIAN JURISDICTION .**

Pursuant to art. 4 L. 218/95, there can be acceptance of the authority of the court lacking authority only if the issue of jurisdictional authority in favor of the foreign judge is not raised in the first defensive stage even if it intervenes after twenty days before the end *vocatio in ius* (among others, Genoa Sent Court of Appeal., 29/05/2010).

As known, pursuant to art. 6 of Regulation no. 1215/2012 "*if the defendant is not domiciled in a member state, the jurisdiction of the courts of each member state is governed by the law of that member state*". Law no. 218/1995 provides that in general the court of the place where the defendant resides has authority, without prejudice to the right to apply the connection criteria set by Section II of Regulation no. 1215/2012 which fully replaced the 1968 Brussels Convention (still referred to in the law of domestic private international law). Article. 7 paragraph 2 of said regulation specifies that in the matter of civil offenses, jurisdiction is rooted in the place where the harmful event occurred or can take place. This rule on special jurisdiction has its foundation in the existence of a particularly close link between the dispute and the judges of the place where the harmful event occurred or can take place, which justifies an attribution of jurisdiction to the latter

courts for the good administration of justice and the procedural economy. The fundamental rationale of the rule is that, in the matter of civil offenses, malicious or negligent, the court of the place where the harmful event occurred or can take place is generally the most suitable to pronounce on the dispute for reasons of proximity and ease of taking evidence.

According to the consistent jurisprudence of the European Court of Justice, the expression "*Place where the harmful event occurred or can take place*" refers both to the place of the event giving rise to the damage and to the place where the damage materialized since each of these places can, depending on the circumstances, provide a particularly useful indication from the point of view of testing and carrying out the process .

In the present case, the fundamental lack of jurisdiction of the national court is evident. In fact, Diet Prada operates in the state of New York, his followers are placed in a completely predominant way in the United States and other English-speaking countries (doc. 05).

For its part, Dolce & Gabbana is a multinational business reality with branched interests in many jurisdictions, whose turnover is mainly obtained from sales made by companies incorporated in non-European countries and, in any case, outside Italy.

Even the alleged wrongdoing linked to "*The Great Show*" was conducted entirely between the United States and Asia. Whatever it is therefore there

configuration that you want to give to the notion of event, it is located outside of Italy.

If by event we mean the generating event it is located in the state of New York. If by place of the event we want to understand the place where the image of Dolce & Gabbana would have been damaged, however, it is located in the Anglo-Saxon-speaking countries where Diet Prada is read and in which Dolce and Gabbana has its own and autonomous equity interests exercised through the use of subsidiaries. If, finally, by place of the event we wanted to mean the one where the unproven drop in turnover linked to Diet Prada's posts would have occurred, also in this case, the competent judge outside Italy should be identified.

A different solution cannot be found even using the principles expressed by the European Court of Justice in the ruling *Bolagsupplysningen* (C-194/2016) which ruled on a case totally different (the case concerned a company that carried out its activity in a single state and that complained of damage that prevented it from accessing the market of a contiguous country, it certainly did not concern a polycentric and branched group such as D&G).

In fact, it would seem a functional forcing to identify a forum and a law that is convenient in itself (if only because of the serious difficulty that requires its defendants to exercise effective defense even for distance and linguistic understanding) the identification of the applicable jurisdiction on the basis of an alleged interest center in Italy from which to

infer that the harmful event took place in our jurisdiction. Dolce & Gabbana, in fact, is a polycentric multinational and branched into multiple jurisdictions.

This reconstruction was endorsed by the European Court of Justice, both with reference to legal entities and with reference to natural persons. The Court, in fact, has specified that a person can have the center of his interests even in a member state in which he does not habitually reside and that, in general, the center of his interests must reflect the place where his commercial reputation is most solid. With particular reference to legal persons, when the legal person carries out most of his activities in a state other than that of his registered office, it must be assumed that the commercial reputation of that person is affected in that state.

It emerges from the same narrative of the actors that Dolce and Gabbana is a widely internationalized reality whose turnover is mainly achieved abroad. Therefore, not even by enhancing the so-called. "Interest center" could lead to the conclusion of the application of Italian law.

On the other hand, the criteria set by regulation 1215/12 are functional to achieve a high degree of predictability with the aim of facilitating the good administration of justice by guaranteeing proximity to the test and avoiding the possibility that the defendant is sued before a court of a state that is not reasonably foreseeable and not

certainly able to be used to allow a multinational company to carry out forms of *shopping forum*.

**3. APPLICABLE LAW: EVEN IF THE ITALIAN JURISDICTION IS DEEMED TO EXIST, THE APPLICABLE LAW WOULD BE THAT OF THE UNITED STATES.**

As is known, the Rome II Regulation (EC Regulation 864/2007) constitutes the universally applicable legal instrument that regulates conflicts of law. The general rule set by art. 4 of the aforementioned regulation provides that in the absence of a common nationality between the parties involved (in the present case, it is reiterated that the allegedly injured legal entity would be Dolce & Gabbana U.S.A. Inc. and therefore there is a common citizenship), the law applicable to non-contractual obligations is that of the country in which the damage occurs regardless of the country in which the fact that gave rise to the damage occurred and regardless of the countries where the indirect consequences of this fact occur. It is evident in the case that concerns us that, on the one hand, the generating event is fully concluded in the United States and, on the other, that the damage was fully exhausted outside Italy since, even if you wanted to access the thesis that today's actors would have suffered serious image damage, this injury to the image would have occurred predominantly in the United States and to a lesser extent in other Anglo-Saxon-speaking countries where Diet Prada readers are located. Even conceding everything, the damages suffered in Italy would be completely indirect in nature.

But there is more.

The Regulation *Rome II* explicitly provides that, if it is clear from all the circumstances of the case that the offense has manifestly closer links with a different country, the law of that country applies. It is clear from the circumstances highlighted that the complained facts present a manifestly closer relationship and connection with the United States.

As mentioned, Dolce & Gabbana is a branched and articulated group, structured on multiple subsidiaries whose revenues are obtained only in one part in Italy and mainly in the United States and Asia. Diet Prada has a predominant audience in the United States, the same celebrities who according to the unfounded counterparty reconstruction would have been bullied are American.

However, no different conclusions must also be reached for the questions personally made by Mr. Stefano Gabbana. In fact, the Rome II Regulation does not apply to non-contractual obligations that derive from violations of privacy and personality rights, including defamation. However, similar results are achieved by applying art. 62 of Law no. 218/1995 since liability for an illegal act is governed by the law of the state in which the event occurred which, as mentioned, must be identified with the United States of America.



**4. LEGITIMACY OF THE CONDUCT ERRONEOUSLY ASCRIBED TO THE PRESENT DEFENDANTS; THE CONTESTED FACTS DO NOT GIVE RISE TO ANY CIVIL LIABILITY PURSUANT TO THE U.S. LAW APPLICABLE TO THE CASE**

Although the rules on defamation and/or violation of the privacy vary in some details from state-to-state, fundamental defense principles based on the First Amendment of the American Constitution are recognized throughout the United States.

American jurisprudence has placed significant limits on the possibility of asserting liability for defamation. The Supreme Court has observed since *New York Times v. Sullivan*, 376 U.S. 254 (1964) that the roots of these limits date back to the process of *John Peter Zenger*, who was accused of publishing defamatory criticisms. The Court, in *Zenger*, stated that if powerful men perform acts that induce people to react with public statements and complaints, those same men cannot be allowed to use the reactions resulting from their acts to reiterate and strengthen oppression and persecution (*The Trial of John Peter Zenger* , 17 Howell's St. Tr. 675, 721-22 (1735)).

In reaching these conclusions, the Court not only recognized the truth as an absolute defense against defamation actions, but also established that freedom of expression and freedom of the press were fundamental principles. The First Amendment states that Congress has no power to introduce laws limiting the freedom of speech or of the press. The Fourteenth Amendment extends the same principle

preventing states from enforcing or executing rules that may affect individual freedom.

The fundamental importance of protecting the rights of freedom of thought and speech and the right to freedom of the press against defamation proceedings that can coerce these freedoms is also consecrated in federal and state norms. At the federal level, the *28 US Code §§ 4101-05* provides that a foreign judgment in a defamation case cannot be carried out in the United States if the foreign process has not guaranteed judicial protection of the freedom of speech and the press similar to that guaranteed by the First Amendment. The claims of which the plaintiffs complain of illegality are not considered as such in the United States, which, on this basis, has not recognized judgments formed in certain foreign jurisdictions (see. *Trout Point Lodge , Ltd. v. Handshoe ,* 729 F.3d 481 (5th Cir. 2013), which stated, on this basis, a Canadian judgment was not recognizable, and *Electronic Frontier Foundation v. Global Equity Mgt. (SA) PTY Ltd.*, 290 F. Supp.3d 923 (N.D.Ca. 2017) that has declared unrecognizable a judgment issued by an Australian court). The New York state law applicable to the case in point also protects the defendants against what are considered instrumental actions to suppress participation in public debate through rules that are defined in anti-SLAPP laws (where SLAPP is acronym for *Strategic Lawsuits Against Public Participation*) and, therefore, deems a judgment that considers an expression defamatory, albeit colorful, to be contrary to public order, since it

must be considered in the context of the desire to take a position in a debate on important issues such as those made by Diet Prada (the *New York Civil Practice & Procedures* §§ 5304 (b) (4) provides that a judgment cannot be recognized if "*The cause of action on which the judgment is based is repugnant to the public policy of this state* " or "*The cause of action resulted in a defamation judgment obtained in a jurisdiction outside the United States, unless the court before which the matter is brought sitting in this state first determines that the defamation law applied in the foreign court's award provided at least as much protection for freedom of speech and press in that case as would be provided by both the United States and New York constitutions*") (see doc. 32 - legal opinion by Jeffrey A. Trexler attached to the present whose considerations have been summarized here).

There is no doubt that the action brought by today's actors is aimed instrumentally at suppressing the freedom of thought and criticism of the defendants by trying to obtain an economically heavy judgment in order to silence a source of news that has highlighted the contradictions between advertised corporate policy and the behavior of one of its founders.

**5. LEGITIMACY OF THE CONDUCT ERRONEOUSLY ASCRIBED TO THE DEFENDANTS: THE CONTESTED FACTS DO NOT GIVE RISE TO ANY CIVIL LIABILITY EVEN PURSUANT TO ITALIAN LAW IF IT APPLIES TO THE CASE.**

Even in the event of applicability of Italian law, the activity carried out by Diet Prada undoubtedly falls within the exercise of the right of reporting and criticism. Diet Prada, as mentioned, aims to provide information on fashion by

highlighting racist stereotypes and stimulating a higher level of originality and equity among designers and brands. The news that Diet Prada offers is of clear public interest.

Furthermore, the communications culture of fashion has always been characterized by excesses, by provocative combinations, by mischievous insinuations, so

much so that the Dolce & Gabbana brand itself has largely exploited this semantic level over the years. Diet Prada does nothing but use the same linguistic tone. Diet Prada's "mission" is to inform its readers. The events affecting one of the most famous fashion houses in the world and its founder - undoubtedly a public figure - is the subject of a wide critical exhibition.

The expressions censored by today's actors and used in the posts published on the Instagram account managed by THEDIETSODA LCC do nothing but reproduce a linguistic tenor typical of the sector and widely used by the company Dolce & Gabbana and, even more casually, by Stefano Gabbana himself .

Diet Prada has always limited itself to expressing its opinions relating to public domain events and has done so in full respect of the right of criticism. While the critical judgment on a fact, understood in a broad sense, is necessarily subjective and can be as such shared or not by the affiliates, the fact, presupposition and object of criticism, must correspond to the truth, even if not absolute, but reasonably putative for the sources from which it originates or for other objective circumstances, as in the exercise of the news right (Cass. civil, sect. III, 04 July 2006, n. 15270). In the present case, the disputed facts refer to episodes that actually happened and of clear public interest.

The medium used - Instagram - is a social network used mostly by young people and is characterized by the speed and effectiveness of communication. The language used is aimed at immediately reaching the heart of the message that you want to transmit and be remembered. Therefore, it is inevitable that, sometimes, the tone used is colorful and deliberately provocative, as has always been the one used by Stefano Gabbana himself.

As is known, Stefano Gabbana and Domenico Dolce publicly took a position stating that children born raised in a homosexual couple should consider themselves synthetic children (doc. 33.01, 33.02 - Article homosexual couples ita / ing).

To Elton John's decisive reaction against these claims, Stefano Gabbana published the phrase "in Elton John's profile Fascists" (Doc. 34 - post Elton John).

In 2013, after the SS13 Collection by Dolce and Gabbana had sparked controversy because it portrayed stereotypical figures of African inspiration (doc. 60, doc. 61, doc. 62, doc. 63 - articles neocolonial models), Gabbana published a post where he was portrayed with the stylist Alessandro dell'Acqua dressed in a blackface mask (evoking the character of Al Jolson, the inspiration for the the image still used by the licorice brand Tabu) certainly offensive to the whole African American community (doc. 35, 36.01, 36.02 - Water Post and related article ita / ing).

In 2015, Stefano Gabbana posted photos that ironically portrayed Chinese traditions through traditional Chinese costume (doc. 37 - Chinese traditions posts).

In 2016, Stefano Gabbana published a post on the city of Naples stating "*I will no longer come to Naples to advertise you, you are ugly people, the disgust of Italy*" (Doc. 38 - post Naples).

On several occasions, Gabbana himself criticized Lady Gaga's body, leading the same stylist to retract previous utterances with a 2017 post (doc. 39 - post Lady Gaga).

In 2017, however, to respond to the social criticisms that were made of a sneakers produced by D&G that reproduced the sentence "*I'm thin and gorgeous*" and which were accused by some Instagram users

of propagating anorexic and ephebolic models of female beauty, he wrote :

*"Dear, you prefer to be fat and full of cholesterol??? I think you have a problem."*

and *"Idiot"* and *"You think it's better to be fat and full of burgers? Stupid"* and

*"Beautiful FAT"* and *"When idiocy distorts reality! Next time we will write It is*

*BEAUTIFUL TO BE FAT AND FULL OF CHOLESTEROL"* (Doc. 40.01, 40.02,

41.01, 41.02 - Posts and D&G shoe items).

With reference to movement *#metoo* , Gabbana published interviews

in which he said, *"after twenty years they touch your butt and you*

*complain? It is not violence. Who does not have sex? It is a trend. Today*

*the trend is sex. "* (Doc. 42.01 , 42.02, 43.01, 43.02 - excerpt and

articles *#metoo*).

But public stances through offensive posts on social media and against more

authentic female models by Gabbana continued. With reference to Selena

Gomez, he published a post *"It is so ugly!"*. On a post depicting

Victoria Beckham, she posted thumbs down (doc. 44, 45, 46.01, 46.02 post

Selena Gomez, post and article Victoria ita / ing).

On a photo that portrayed Kate Moss in 2018 carrying a miniskirt, Gabbana

posted the phrase "no" (doc. 47, 48.01, 48.02 - posts and articles Moss ita /

ing).

On a photo depicting the Kardashian sisters he posted the following

comment *"The most vulgar people in the world"* (Doc. 49, 50.01, 50.02, 50.03

- posts and articles Kardashian-Jenners ita / ing).

On Chiara Ferragni's photo in a wedding dress, Gabbana wrote "*vulgar*"(Doc. 51, 52.01, 52.02 - posts and articles Ferragni ita / ing).

In 2018, Gabbana gave an interview that gave reason to think about his anti-Asian racism. To the question "*Who will inherit your group.*" Gabbana replied "*When we are dead we will be dead, I certainly don't want that a Japanese stylist designs for Dolce and Gabbana* " (Doc. 53.01, 53.02 article and excerpt article acquisition Japan).

But Gabbana, with a very direct linguistic tenor and evidently considered in line with the brand's communication policy, responded to critical posts that he received with such phrases "*Idiot*", "*idiot and ignorant*", "*idiot and (image depicting a goat)*" and "*Go shit idiot.*". To those who criticized him for perpetuating outdated beauty models he replied "*Go back to school and take fashion lessons, stupid girl!*"(Doc. 54 - SG replies).

Also with reference to Diet Prada, Gabbana stated in several posts "*The most ignorant duo of fashion on Instagram* " (Doc. 55 - SG comments on DP). These examples give ample evidence of a common linguistic tone, in vogue on the social platforms that the designer usually uses. There is no doubt that where the violation of the principle of moderation is the subject of complaint, this notion should be subject to a review which takes into account the context and the tool that is used in communications deemed excessive.



It seems clear that the linguistic tenor of Gabbana and the other users of the platform is characterized by a colloquiality where the articulated comment is made

and often replaced the vernacular and / or vulgar interlocution and, in the evaluation of the moderation, the message certainly cannot be isolated in order to ask for protection against posts and comments that are inserted fully in the same linguistic register used by the designer himself.

Therefore, the posts of which the defamatory nature complains are inserted in a semantic register common to both social users and Gabbana himself who make extensive use of phrases that draw from the vulgar but which are aimed at giving rise to an evident widely accepted critical summary.

Adequate value must therefore be given to the context and debate in which they are inserted and to the desire, through a register evidently adequate to the medium used, to criticize the models advocated by the person who has been perceived as misogynistic and racist.

In order to better understand the respect of canons and themes in vogue in the context in which they move, it is worth dwelling on some examples that have also characterized the communication and style of Dolce & Gabbana. In fact, the language of fashion is often characterized by excess, by extensive references to sexuality and the present plaintiffs make extensive use of this language.

The fashion house has widely used the notion and stereotype of the "Boy Toy" by printing this term on collaborative shirts

in collaboration with the star Madonna, owner of the company "Boy Toy Inc.".

It is clear that Dolce & Gabbana intended to exploit a strong and winking combination to profit from it. Therefore, references to "boy toys" are also specious and pretentious and fall within the exercise of the right of news. First, since the term "Boy Toy" is commonly used in jargon to identify the member, be it man or woman, in those couples made up of individuals of decidedly different ages. Second, as mentioned, since the name "Boy Toy Inc." in the past, it was exploited directly by the fashion house which commercially benefited from the association with the name of the company owned by Madonna.

Also on the occasion of the event "*Great Show*" scheduled in 2018 in Shanghai, Diet Prada performed its news function. The Instagram account, in fact, did not publish, but only shared the stories of third parties who had published the exchange of private messages with Stefano Gabbana (however also from the same Gabbana in his stories) and in doing so has made known to its readers news of undoubted public interest. In fact, it is in the public interest to know the ethical reference paradigms to which operators in the sector conform so that they can adapt their consumption choices to their values. In the specific case, the fashion house itself prides itself on promoting a policy

of inclusion and tolerance between employees and suppliers, only to manifest tendencies that are perceived as contemptuous and racist.

The accusation of the exploitation of sex complained today by the present plaintiffs is still surprising. As said, in fact, the present plaintiffs first often associated their brand with images with a very strong sexual connotation.

Diet Prada tries to create effective forms of communication through the creative use of new languages such as memes. The latter are images, GIFs and short videos used to comment on public facts from a parodic and satirical perspective. For example, the meme that portrays Mr. Gabbana who seems to punch and dodge phrases like "*tax evasion*" and "*rent boy*" aims to illustrate that the stylist has faced multiple scandals as a public figure, but despite this, the problems do not seem to have scratched him.

The same, therefore, are not personally directed to the person, but are superimposable on any public figure who can take advantage of their skills to fight and overcome events of great public resonance.

In the specific case, moreover, this form of communication made it possible to highlight both the fact that over the years Dolce & Gabbana made use of an aggressive fiscal policy that had given rise to it, as already said in fiction, to numerous tax assessments (many of them still in progress as emerges from the company's balance sheets) both to the circumstance and

often Mr. Gabbana has also been associated with *average* important, and with the consent of Gabbana himself, to concepts such as "*rent boy*" or "*toy boy*". Certainly the actors will not be able to deny a clear intentionality in this sense in the use over the years of equivocal gender messages (it has already been said, in fact, of the collaboration started by the same with the company "Boy Toy Inc.").

With reference to the definitions reported by the counterparty and allegedly referring to Stefano Gabbana, moreover, it should be noted that the same never directly originated from Diet Prada's Instagram account, but they were shared by the latter on their profile - by stories circulating on Weibo - or concern comments addressed to the stylist by third parties. It goes without saying that Diet Prada cannot be attributed responsibility for comments made by third parties and already disseminated on the web.

It is also clearly forced to claim that Diet Prada is engaged in an ongoing campaign of rage towards the present plaintiffs. This statement is corroborated by the fact that weeks, entire shows have passed campaigns and parades without today's defendant mentioning Dolce & Gabbana, which was mentioned only on the occasion of communication choices made by the actors who were deemed worthy of public interest. Certainly the attribution to today's defendants or to Diet Prada of the causes of the alleged commercial damage suffered due to the controversial communication choices of the actors appears to be a forcing.

## 6. ERRONEOUS CALCULATION OF DAMAGES

It is therefore surprising that according to the incorrect and specious reconstruction of the present plaintiffs the responsibility for the cancellation of "*Great Show*" would be allegedly - and erroneously - attributable to today's defendants. If we can talk about responsibility, in fact, the same would be none other than the fashion house and its designer who first advertised the event through a video that ridiculed Asian culture and subsequently exchanged racist and discriminatory messages to the Chinese people.

With specific reference to the alleged illegal publication of Stefano Gabbana's private conversations, it is specified that they were published from the original source and Diet Prada only shared these conversations on his Instagram profile.

Furthermore, on the alleged media lynching of any D&G testimonial and supporter, it is necessary first of all to depart from the specious association of "Dieters" (the followers of the Instagram page Diet Prada) with "haters" (the web haters). The exploitation of the assonance between the two words to insinuate that the "Dieters" are "haters" is specious and dismissed of any foundation.

With specific reference to the two actors in the series "*Queer Eye*", the counterparties claim that they departed from the Dolce & Gabbana brand as a result of a story published by Diet Prada seems unfounded. We just remember that the actors in question

are gay rights pioneers in the U.S. and have distanced themselves from the brand following statements by the designer deemed homophobic because they are contrary to requests strongly claimed by most of the LGBT world (certainly not because they are veiled by today's defendant). As proof of this, just think that the aforementioned actors for years have collaborated with Walmart - at the time of the decidedly unpopular collaboration - and are used to going against the current without fear of intimidation.

The reference to the episode that would have involved Kim Kardashian also appears invented: Diet Prada has never directly contacted the well-known entrepreneur and counterpart has in no way demonstrated (nor could) the accusations made.

Even with reference to the episode that affected Cardi B, counterpart forgets to prove his accusations.

With reference to the singer Katy Perry, Diet Prada only reported the acronym in the caption "*WTF*", without any direct correlation between the caption and the dress worn by the singer.

Finally, the counterpart will have to explain how the onomatopoeia "*GRRR*" on a post is equivalent to intimidating and inducing the actress Emilia Clarke not to advertise Dolce & Gabbana.

With reference to the article of 12 June 2019 published in the *New York Times* mentioned by the counterpart, Diet Prada limited itself to underscoring

some key passages of the narrative that highlighted the scandal caused by Dolce & Gabbana.

Therefore, condemning Diet Prada for pointing out some passages written by third parties would necessarily entail calling into question the entire fashion and journalism industry dedicated to it. Again, regarding the articles signed by Suzy Menkes, no "media bullying" was carried out. On this point, today's defendant - like many others - only noted that the journalist's review for Vogue ignored crucial facts regarding news known to the world and, precisely because of the relevance of the news, that it was the same as taking a position in defense of the brand.

It is in any case at least questionable to attribute to the Instagram account Diet Prada so much importance to argue that influencers and celebrities have departed from the Dolce & Gabbana brand due to the posts published by the same. The cause of this dissociation is rather attributable to the actions of the brand itself.

What was stated by the counterpart only confirms that many celebrities once sympathizers with the Dolce & Gabbana brand have considered it morally correct to distance themselves from positions that they believed they did not share and with which they did not want to be associated - in this specific case statements by the fashion house perceived as racist that were only denied with statements that appeared to many to be a mere facade.

The claim that Diet Prada would be responsible for canceling the show also appears to be a completely forced interpretation. The unfortunate videos by

Dolce & Gabbana provoked a strong reaction from public opinion and the Chinese media and social media (and not Diet Prada) gave news of a cancellation of the event by the authorities.

**7. CONDEMNATION EX ART. 96, PARK 1 AND 3, C.P.C. FOR ABUSE OF PROCESS: THE PLAINTIFFS HAVE USED AGAINST TWO SUBJECTS A JUDICIAL ACTION WITH THE GOAL OF INTIMIDATING AND SUPPRESSING THE FREE EXERCISE OF SPEECH AND CRITIQUE, WITH AN INCREDIBLE REQUEST FOR A RECANTATION THAT IS NOT SUBSTANTIATED AND INTENDS TO INTIMIDATE THE DEFENDANTS.**

The plaintiffs, as mentioned, use procedural tools to silence a right that has fundamental importance: the right of reporting and thought of two young people who intend to promote a new business paradigm model. This attempt must also be formally censored with the condemnation of the actors' expenses. As highlighted by the jurisprudence: "in terms of civil proceedings, the

sentence pursuant to art. 96 paragraph 3 of the Italian Criminal Code. is aimed at safeguarding publicity purposes, related to the need for a prompt and effective definition of judgments, as well as interests of the victorious party and at sanctioning the violation of the duties of loyalty and probity enshrined in art. 88 c.p.c., realized through a real abuse of the "*potestas agendi*" with the use of the power to promote the dispute, in itself legitimate, for purposes other than those to which it is preordained, with consequent production



of detrimental effects for the counterparty. It follows that the order for payment of the amount equally determined does not require either the request for a party, nor evidence of damage, however, verification is necessary, at the end of the unsuccessful part, of bad faith (awareness of the groundlessness of the question) or gross negligence (for lack of ordinary diligence aimed at acquiring this awareness)" (v Court of Appeal L'Aquila Sent., 15/01/2020, Milan Court Section. VII Sent., 28/10/2019, Cass. civ. Sec. VI - 2 Ord., 24/10/2019, n. 27326)

\*\*\*

In light of the above, the defendants *ut supra* , submit their own

### **CONCLUSIONS**

May it please the court,

**IN THE COLLATERAL PROCEDURE**, ascertain and declare the lack of jurisdiction of the court in favor of the New York forum, or in the alternative, in favor of the Shanghai or Hong Kong forum.

**IN THE PRELIMINARY PROCEDURE**, ascertain and declare the lack of passive standing of today's defendants and / or the lack of active ownership of the actors.

**IN THE MERIT**, declare the groundlessness of the questions formulated and reject them because they are unfounded in fact and law.

**IN EVERY CASE**, with counterparty ordered to pay legal fees, as well as a sum determined pursuant to art. 96 co. 1 and 3 c.p.c.

**IN THE INVESTIGATION PROCEDURE,** evidence for formal interrogation and texts is requested on the following exhibits which, amended by any evaluation and / or judgment, are to be understood preceded by the words "it is true that":

1) in preparation for the Great Show, Dolce & Gabbana published three videos on the Weibo social network that portrayed a Chinese woman in traditional clothes trying to eat Italian food and, in particular, a large cannolo and that a voiceover asked her "is it too big?"

2) these videos provoked an indignant reaction from much of Chinese public opinion ;

3) in November 2018 in an exchange of messages on Instagram, Stefano Gabbana stated that the videos referred to in chapter 1 had been deleted by the Chinese social media Weibo because his marketing office was as stupid as the majority of the Chinese and that he would never delete it .

4) In the same conversation Stefano Gabbana stated that from then on in all international interviews he would say that China is a country comparable to dung and added "China Ignorant stinking mafia".

5) These claims were filed by many social users

6) Diet Prada resumed these conversations after these conversations had been posted on social media by third parties

They are indicated to witnesses to be heard also by letters rogatory

- Anthony Medina, Av Nizuc 3D, Cancún Quintana Roo, 77506 México;

- Michaela Tranova 2202, 28 Western Gateway London, E16 1YN, UK

They are offered in communication :

01. - Post DP

02.01 - Article Quartz

02.02 Article Quartz - ing

03.01 Article Prada

03.02 Article Prada - ing

04.01 Article Gucci

04.02 Article Gucci - ing

05. Visitor files

06.01 Great Show article

06.02 Great Show article

06.03 Great Show article 3

06.04 Article Great Show 4

06.05 Article Great Show 4 ing

07 Trump article

08. Post hacking

9. Code of ethics Dolce Gabbana

10.01 Advertising 2007

10.02 Article advertising 2007

11. Toy boy shirt

12.01 Article Independent

12.02 Article Independent - ing

13. comments Elton and King

- 14. Cannolo Great Show
- 15. Post Great Show
- 16.01 Article Jenny McCarthy
- 16.02 - Article Jenny McCarthy - ing
- 17.01 Article Jenny McCarthy2
- 17.02 Article Jenny McCarthy 2 - ing
- 18. Article 2002
- 19.01 Article Lady Gaga
- 19.02 Article Lady Gaga 1 - ing
- 20.01 Article Lady Gaga 2
- 20.02 Article Lady Gaga 2 - ing
- 21.01 Article Lady Gaga 3
- 21.02 Article Lady Gaga 3 - ing
- 22.01 Article Lady Gaga 4
- 22.02 Article Lady Gaga 4 - ing
- 23. Post Selena Gomez
- 24.01 Article Selena Gomez
- 24.02 Article Selena Gomez 1 - ing
- 25.01 Article Selena Gomez 2
- 25.02 Article Selena Gomez 2 - ing
- 26.01 Article Selena Gomez 3
- 26.02 Article Selena Gomez 3 - ing
- 27.01 Article Selena Gomez 4

27.02 Article Selena Gomez 4 - ing

28.01 Article Selena Gomez 5

28.02 Article Selena Gomez 5 - ing

29.01 Article Chiara Ferragni

29.02 Article Chiara Ferragni 1 - ing

30.01 Article Chiara Ferragni 2

30.02 Article Chiara Ferragni 2 - ing

31.01 Article Chiara Ferragni 3

31.02 Article Chiara Ferragni 3 - ing

32. Legal opinion Jeffrey A. Trexler

33.01 Article homosexual couples

33.02 Article homosexual couples - ing

34. Post Elton Jhon

  

36.01 Post article of water

36.02 Post Water Article - ing

37. Chinese tradition posts

38. Post Naples

39. Post Lady Gaga

40.01 Post shoe D&G

40.02 Item Shoes

41.01 Post shoe article D&G

41.02 Article Post shoes - ing

42.01 Article method

42.02 excerpt metoo article

43.01 Article #metoo

43.02 Article #metoo - ing

44. Post Selena Gomez

45. post Victoria

46.02 Article Victoria - ing

48.02 Article Moss - ing

50.02 Article Kardashian-Jenners - ing

51. post Ferragni

52.02 Article Chiara Ferragni - ing

53.01 Japan acquisition article

53.02 excerpt Article acquisition Japan

54. Answers SG

55. SG comments on DP

56. Dolce & GAbbana Holding Srl Paper

57. Dolce & Gabbana Srl Paper

58. D&G Srl file

59. Trademarks D&G file

60. Article China

61. Neocolonial model article 1

62. Neocolonial model article 2

63. Neocolonial model article 3

64.01 DM Anthony

64.02 DM Anthony

65. Stereotype article National Network to end Domestic violence ;

66. Article Steretypes Asian women Healthline;

With Observance ,

1/3/2021

Avv. Marco Amorese

Avv. Anna Orofino