

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 21-62119-CIV-HUCK**

OMEGA SA, *et al.*

Plaintiffs,

vs.

COPYOMEGAWATCHES.CO, *et al.*

Defendants.

/

**DECLARATION OF VIRGILIO GIGANTE IN SUPPORT OF PLAINTIFFS’
MOTION FOR ORDER AUTHORIZING PLAINTIFFS TO INITIATE DISCOVERY**

I, Virgilio Gigante, declare and state as follows:

1. I am an attorney duly authorized and licensed to practice law before all courts in the State of Florida and the Southern District of Florida. I am counsel of record for Plaintiffs, Omega SA, Blancpain SA, Compagnie des Montres Longines, Francillon S.A., Glashütter Uhrenbetrieb GmbH, Hamilton International AG, Montres Breguet S.A., Rado Uhren AG, and Tissot SA (collectively, “Plaintiffs”) in the above captioned action. I submit this Declaration, which is filed in support of Plaintiffs’ Motion for Order Authorizing Plaintiffs to Initiate Discovery. I am personally knowledgeable of the matters set forth in this Declaration and, if called upon to do so, I could and would competently testify to the following facts set forth below.

2. On October 18, 2021, Plaintiffs filed their Motion for Order Authorizing Alternate Service of Process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) [ECF No. 5]. On October 20, 2021, the Court entered an Order Granting Motion for Alternate Service [ECF No. 7], authorizing Plaintiffs to serve the Summonses, Complaint, and all future filings in this action upon Defendants via electronic mail (“e-mail”) and via Plaintiffs’

designated serving notice website appearing at the URL

<http://servingnotice.com/Qs3o12/index.html>.

3. Pursuant to the Court's Order authorizing alternate service, Plaintiffs served Defendants with their respective Summons and a copy of the Complaint via e-mail and via Plaintiffs' designated serving notice website on November 4, 2021. (See Proof of Service on file with the Court [ECF No. 17].)

4. On November 4, 2021, Plaintiffs also advised Defendants of the parties' requirement to confer and requested Defendants respond to Plaintiffs' request. To date, Plaintiffs have not received any response from any of the Defendants in connection with the request to confer.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 12th day of November, 2021, at Fort Lauderdale, Florida.


Virgilio Gigante