

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 24-62388-CIV-SINGHAL

ADIDAS AG, *et al.*,

Plaintiffs,

vs.

THE INDIVIDUALS, BUSINESS ENTITIES,  
AND UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A,”

Defendants.

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**PLAINTIFFS’ MOTION TO UNSEAL**

Pursuant to Local Rule 5.4(b)(1), Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc., (“Plaintiffs”), hereby move this Court for an Order unsealing all documents that have been restricted/sealed from the Court docket and returning all portions of the Court file to the public records.

1. On December 22, 2024, Plaintiffs filed their Motion to File Under Seal [DE 5], requesting Schedule “A” to Plaintiffs’ Complaint be filed under seal. On December 6, 2024, the Court issued an Order granting Plaintiffs’ Motion to File Under Seal [DE 12], and Plaintiffs subsequently filed Schedule “A” to Plaintiffs’ Complaint [DE 13] under seal on April 2, 2025.

2. On December 23, 2024, Plaintiffs filed their *Ex Parte* Application for Entry of Temporary Restraining Order and Preliminary Injunction, together with the supporting Declarations and Exhibits (the “*Ex Parte* Application”) [DE 6], pursuant to Local Rule 5.4(d), which requires, unless the Court directs otherwise, *ex parte* filings be restricted from public view.

3. On April 7, 2025, this Court issued an Order Granting Plaintiffs' *Ex Parte* Application (the "Temporary Restraining Order"). Plaintiffs are serving Defendants with the Temporary Restraining Order, together with all other documents filed in this case.

4. As a seal on this matter is no longer required, Plaintiffs respectfully request this matter be unsealed and the portions of the docket relating to Plaintiffs' *Ex Parte* Application, together with all other documents that have been restricted from the Court docket, be returned to the public portions of the Court file.

WHEREFORE, Plaintiffs respectfully request this Court issue an Order unsealing all documents filed with the Court that have been restricted from the Court docket and direct the Clerk to return those portions of the Court file to the public records.

DATED: April 9, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Virgilio Gigante**

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Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 9, 2025, a true copy of the foregoing was served upon Defendants via the e-mail addresses at which Defendants were served, and by posting copies of the same on Plaintiffs' designated service notice website appearing at the URL <http://servingnotice.com/D41s9x/index.html>.

**Virgilio Gigante**  
Virgilio Gigante