

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

ADIDAS AG, *et al.*,

Plaintiffs,

vs.

ALLKICKS.SHOP, *et al.*

Defendants.

---

**DECLARATION OF STEPHEN M. GAFFIGAN IN SUPPORT OF  
PLAINTIFFS' REQUEST FOR CLERK'S ENTRY OF DEFAULT**

I, Stephen M. Gaffigan, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc. ("Plaintiffs") in the above-captioned matter. I make this Declaration, which is filed in support of Plaintiffs' Request for Clerk's Entry of Default, and I could and would testify competently to the matters set forth herein.

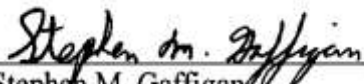
2. On December 19, 2024, Plaintiffs filed their Complaint. (ECF No. 1) Plaintiffs subsequently filed their Amended Complaint on April 9, 2025 (ECF No. 20) against Defendants, Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto (collectively, "Defendants").

3. On April 11, 2025, Defendants were served with their respective Summons and copies of the Complaint and Amended Complaint via electronic mail ("e-mail") and via website posting pursuant to the Court's Order authorizing alternate service of process. (See ECF No. 26-1 and 26-2, Affidavits of Service on file with the Court reflecting that Defendants were served.)

4. The time allowed for Defendants to respond to the Complaint has expired.
5. The Defendants have not been granted an extension of time to respond to the Complaint.
6. The Defendants have failed to answer or otherwise respond to the Complaint, or serve a copy of the Answer or other response upon Plaintiffs' attorneys of record.
7. I am informed and believe none of the Defendants are infants or incompetent persons, and, upon information and belief, the Servicemembers Civil Relief Act does not apply.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 5, 2025, at Ft. Lauderdale, Florida.

  
Stephen M. Gaffigan

**SCHEDULE "A"**

| <b>Defendant Number</b> | <b>Defendant / Domain Name</b> |
|-------------------------|--------------------------------|
| 1                       | allkicks.shop                  |
| 2                       | 91sheep.net                    |
| 3                       | basetao.xyz                    |
| 4                       | boolopo.net                    |
| 5                       | carlkicks.net                  |
| 6                       | cnfactory.co                   |
| 7                       | cnfashionbuy.shop              |
| 8                       | cocokicks.xyz                  |
| 9                       | cocosneakers.co                |
| 10                      | coolkicks.shoes                |
| 11                      | crewkicks.shoes                |
| 12                      | elevenkicks.co                 |
| 13                      | fashionreps.shoes              |
| 14                      | flightkickz.co                 |
| 15                      | goosemasterkim.org             |
| 16                      | hicoco.co                      |
| 17                      | hypeunique.net                 |
| 18                      | joystudio.xyz                  |
| 19                      | kickbulk.shop                  |
| 20                      | lkkiks.net                     |
| 21                      | mangomeee.shop                 |
| 22                      | monicasneaker.co               |
| 23                      | mrhou.net                      |
| 24                      | ogtony.xyz                     |
| 25                      | perfectkicks.shoes             |
| 26                      | popkicks.co                    |
| 27                      | repkicks.shoes                 |
| 28                      | repsnkrs.co                    |
| 29                      | shoesreplica.com               |
| 30                      | sneakershead.net               |
| 31                      | sneakerwill.shoes              |
| 32                      | suprize.shop                   |
| 33                      | uaplg.org                      |
| 34                      | ua-shoes.net                   |
| 35                      | uasneakers.net                 |