

**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.

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**REQUEST FOR CLERK'S ENTRY OF DEFAULT**

Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc. ("Plaintiffs"), by and through their undersigned counsel, hereby request that the Clerk enter default in this matter against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto (collectively "Defendants") on the ground that Defendants have failed to appear or otherwise respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure. (Declaration of Stephen M. Gaffigan in Support of Plaintiffs' Request for Clerk's Entry of Default ("Gaffigan Decl.") ¶ 6, filed concurrently herewith.)

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. (Gaffigan Decl. ¶ 3; see ECF No. 26-1 and 26-2, Affidavits of Service on file with the Court.)

Time allowed for Defendants to respond to the Complaint has expired. (Id. at ¶ 4.) Neither Plaintiffs nor the Court has granted the Defendants an extension of time to respond to the Complaint. (Id. at ¶ 5.) Defendants have failed to answer or otherwise respond to the Complaint,

or serve a copy of any Answer or other response upon Plaintiffs' attorneys of record. (Id. at ¶ 6.) Plaintiffs are informed and believe that none of the Defendants are infants or incompetent persons. (Id. at ¶ 7.) Plaintiffs are informed and believe that the Servicemembers Civil Relief Act does not apply. (Id.)

WHEREFORE, Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc., request that default be entered against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto.

DATED: June 5, 2025

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: /Stephen M. Gaffigan/

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*Attorneys for Plaintiffs*

**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	uapl.org
34	ua-shoes.net
35	uasneakers.net

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on June 5, 2025, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that a true copy of the foregoing was served this 5<sup>th</sup> day of June 2025, via e-mail to the e-mail addresses at which Defendants were served and via website posting by posting a true and accurate copy of the following document(s) on the website <http://servingnotice.com/D41s9x/index.html>.

s:/Stephen M. Gaffigan/

Stephen M. Gaffigan