

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 23-61084-CIV-SMITH**

ADIDAS AG, *et al.*,

Plaintiffs,

vs.

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

Defendants.

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**MOTION FOR ENTRY OF CONSENT FINAL JUDGMENT AND PERMANENT  
INJUNCTION AS TO DEFENDANT NUMBERS 18, 19, 21, 30 AND 62**

Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc., (collectively “Plaintiffs”), by and through their undersigned counsel, hereby move this Honorable Court for entry of the Consent Final Judgment and Permanent Injunction as to Defendants designergunews.ru a/k/a designergunews.xyz (Defendant Number 18); dopestkickz.cc a/k/a dopestkickzclub.ru a/k/a dopestkickzfans.ru a/k/a dopestkickznews.ru (Defendant Number 19); fashionkicks.xyz (Defendant Number 21); jerseydor.com (Defendant Number 30); weekknight.com (Defendant Number 62) (collectively, the “Consent Judgment Defendants”). In support thereof, Plaintiffs state as follows:

1. Plaintiffs and the Consent Judgment Defendants have resolved all claims in connection with this matter and have agreed to the entry of a consent judgment. To avoid filing multiple motions, Plaintiffs have consolidated the individually agreed to consent judgments into one Consent Judgment in the form submitted herewith. (See Statements of Consent executed by the individuals and authorized agents for the Consent Judgment Defendants, attached hereto as Composite Exhibit “1”).

2. Accordingly, Plaintiffs and the Consent Judgment Defendants respectfully request this Court grant this Motion and enter the Consent Judgment.

Dated: April 2, 2024.

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 2, 2024, a true copy of the foregoing was served upon Defendant Numbers 18, 19, 21, 30 and 62 via the e-mail address at which Defendants were served, and by posting copies of the same on Plaintiffs' designated service notice website appearing at the URL <https://servingnotice.com/Da30w4k/index.html>.

**Virgilio Gigante**  
Virgilio Gigante