UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 26-21507-CIV-ALTONAGA

ADIDAS AG, *et al.*,

Plaintiffs,

vs.

CLUBJERSEYWIN.COM, *et al.*

Defendant.
_____/

PLAINTIFFS' VERIFIED RESPONSE TO THE COURT'S OMNIBUS ORDER

Plaintiffs, adidas AG, adidas International Marketing B.V., and adidas America, Inc ("Plaintiffs"), by and through their undersigned counsel, hereby submit this verified response to the Court's Omnibus Order, dated March 9, 2026 [ECF No. 4]. In support thereof, Plaintiffs state as follows:

1. In preparation for the filing of this action, on February 23, 2026, my firm conducted a search on the Public Access to Court Electronic Records ("PACER") of case filings through the United States case index search, and confirmed Plaintiffs have not filed against the Defendant clubjerseywin.com, including its aliases dejersey.top, footballjerseygo.com, footballjerseygo.top, footballjerseysea.com, jerseyeeu.com, jerseyeeu.shop, jerseyeuguu.com, jerseyeuguu.shop, jerseyfo.com, jerseylogoshop.com, jerseyuu.com, jerseywin.top, kkjersey.shop, newarrivalwin.com, jerseyfastshipping.com, nisoccerjersey.com, oldjerseysee.com, salejerseyeu.com, nnjersey.top, salejerseyeu.top, salejerseypro.com, salejerseypro.top, sundayjersey.shop, worldsoccerfo.com, and jerseyget.top, in any other district.

2. Additionally, contemporaneously herewith, Plaintiffs are filing a Motion for Order Authorizing Alternate Service of Process Pursuant to Federal Rule of Civil Procedure 4(f)(3), at [ECF No. 7] ("Plaintiffs' Motion for Alternative Service"). Plaintiffs' Motion for Alternative Service encompasses the Court's requirements for such motions and attaches sworn declarations regarding Defendant's purported domicile, the efforts Plaintiffs have undertaken to discover Defendant's domicile, and Plaintiffs' efforts to investigate a possible address for Defendant prior to seeking this relief from the Court. Plaintiffs' Motion for Alternative Service further specifies the form of alternate service being requested and whether these forms are permitted by the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents as to Defendant's purported domicile.

3. Accordingly, Plaintiffs respectfully submit their Motion for Alternative Service is being filed in compliance with the terms of the Court's Omnibus Order.

DATED: March 11, 2026.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Virgilio Gigante**
Stephen M. Gaffigan (Fla. Bar No. 025844)
Virgilio Gigante (Fla. Bar No. 082635)
T. Raquel Wiborg-Rodriguez (Fla. Bar No. 103372)
401 East Las Olas Blvd., Suite 130-453
Ft. Lauderdale, Florida 33301
Telephone: (954) 767-4819
E-mail: Stephen@smgpa.cloud
E-mail: Leo@smgpa.cloud
E-mail: Raquel@smgpa.cloud

Attorneys for Plaintiffs

VERIFICATION

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed March 11, 2026, at Fort Lauderdale, Florida.

Virgilio Gigante