

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 23-60728-CIV-SMITH**

GUCCI AMERICA, INC.,

Plaintiff,

vs.

AUTHENTICGUCCIBAGSOUTLETUSA.COM,
et al.,

Defendants.

**DECLARATION OF STEPHEN M. GAFFIGAN IN SUPPORT OF
PLAINTIFF’S 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 Plaintiff, Gucci America, Inc. (“Plaintiff”) in the above-captioned matter. I make this Declaration, which is filed in support of Plaintiff’s Request for Clerk’s Entry of Default, and would testify competently to the matters set forth herein.

2. On April 18, 2023, Plaintiff filed its Complaint against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” hereto (collectively, “Defendants”). (ECF No. 1.)

3. On December 20, 2023, Defendants were served with their respective Summons and a copy of the Complaint via electronic mail (“e-mail”) and via website posting pursuant to the Court’s Order authorizing alternate service of process. (See ECF Nos. 10-1, 10-2 and 10-3, 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.

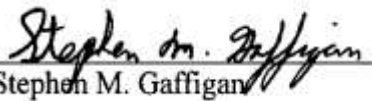
5. The Defendants have not been granted an extension of time to respond to the Complaint.

6. The Defendants have failed to answer or otherwise respond to the Complaint, or serve a copy of the Answer or other response upon Plaintiff's 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 February 15, 2024, at Ft. Lauderdale, Florida.


Stephen M. Gaffigan

SCHEDULE "A"

Defendant Number	Defendant / Domain Name
1	authenticguccibagsoutletusa.com
2	cheapguccibags.shop
3	cheapguccibelts.shop
4	cheapguccihandbags.shop
4	cheapguccionline.shop
4	cheapguccioutlet.shop
4	guccibagsoutlet.shop
4	guccibagsoutlet.shop
5	guccibagoutletusa.com
6	guccifactoryoutlet.com
7	guccifakeshop.com
8	gucciknirps.shop
9	gucciofficialoutlets.com
10	guccireplica.ru
11	gucciselling.com
12	gucciverkauf.com
14	annaonline.store
15	atelier-elegant.net
16	brandshoefactory.com
17	designbags.us
18	designergunews.ru
19	dolabuy.ru
20	elegantnicely.com
21	fashionreps.me
22	fast-world-leather.com
23	finerlabels.net
24	fortok.ru
25	highstreetporter.com
26	hypetrndz.com
27	joyrep.ru
27	vincystore.com
28	kickbulk.co
29	lakshory.shop
30	luxurydeal.cc
31	mydevalie.com
32	mywikibag.com
33	ourfashion.net
34	perfectkick.org
35	replicagods.com

Defendant Number	Defendant / Domain Name
36	topbagsclub.com
37	uafactory.co