

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

GUCCI AMERICA, INC.,

Plaintiff,

vs.

AUTHENTICGUCCIBAGSOUTLETUSA.COM,  
*et al.*,

Defendants.

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

Plaintiff, Gucci America, Inc. ("Plaintiff"), 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 Plaintiff's Request for Clerk's Entry of Default ("Gaffigan Decl.") ¶ 6, filed concurrently herewith.)

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. (Gaffigan Decl. ¶ 3; see ECF Nos. 10-1, 10-2 and 10-3, Affidavits of Service on file with the Court.)

Time allowed for Defendants to respond to the Complaint has expired. (Id. at ¶ 4.) Neither Plaintiff 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 Plaintiff's attorneys of record. (Id. at ¶ 6.) Plaintiff is informed and believes that none of the Defendants could be considered infants or incompetent persons. (Id. at ¶ 7.) Plaintiff is informed and believes that the Servicemembers Civil Relief Act does not apply. (Id.)

WHEREFORE, Plaintiff, Gucci America, Inc., requests that default be entered against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto.

DATED: February 15, 2024

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: /Stephen M. Gaffigan/

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez (Fla. Bar No. 103372)

Christine Ann Daley (Fla. Bar No. 98482)

Mallory Ruth Denzl (Fla. Bar No. 1050351)

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

E-mail: Christine@smgpa.cloud

E-mail: MalloryR@smgpa.cloud

*Attorneys for Plaintiff*

**SCHEDULE "A"**

<b>Defendant Number</b>	<b>Defendant / Domain Name</b>
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

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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on February 15, 2024, 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 15<sup>th</sup> day of February 2024, 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 <https://servingnotice.com/G29ap/index.html>.

s:/Stephen M. Gaffigan/

Stephen M. Gaffigan