

**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 T. RAQUEL WIBORG-RODRIGUEZ IN SUPPORT OF
PLAINTIFF’S MOTION FOR ENTRY OF
DEFAULT FINAL JUDGMENT AGAINST DEFENDANTS**

I, T. Raquel Wiborg-Rodriguez, declare and state as follows:

1. I am an attorney for the Plaintiff, Gucci America, Inc. (“Gucci”) in the above captioned action. I submit this Declaration in support of Plaintiff’s Motion for Entry of Default Final Judgment against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” attached to Plaintiff’s Motion for Entry of Default Final Judgment (collectively “Defendants”) and, if called upon to do so, I could and would competently testify to the following facts set forth below.

2. On April 18, 2023, Gucci filed its Complaint for Injunctive Relief and Damages in this action against Defendants [DE 1].

3. On April 19, 2023, Gucci filed its Motion for Order Authorizing Alternate Service of Process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) (“Motion for Alternate Service”) [DE 5], which the Court granted on December 19, 2023 [DE 7], authorizing Gucci to serve the Summonses, Complaint, and all filings in this matter upon Defendants via

electronic mail (“e-mail”) and by posting copies of the same on Gucci’s Website appearing at the URL <https://servingnotice.com/G29ap/index.html>.

4. Pursuant to the Court’s Order Granting Motion for Alternate Service, Gucci served Defendants with their respective Summons and a copy of the Complaint via e-mail and website posting on December 20, 2023. (See [DE 10], Proof of Service on file with the Court.)

5. The time allowed for Defendants to respond to the Complaint has expired.

6. To date, Defendants have not filed any responsive pleadings to the Complaint, have not requested an enlargement of time to respond to the Complaint, nor have Defendants entered a formal appearance *pro se* or by counsel on their behalf.

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.

8. On February 15, 2024, Gucci filed its Request for Clerk’s Entry of Default [DE 11], and the Clerk subsequently entered default against each Defendant on February 16, 2024, for failure to appear, answer or otherwise plead to the Complaint filed herein within the time required [DE 12].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 28th day of January 2025, at Hollywood, Florida.


T. Raquel Wiborg-Rodriguez