

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-22390-CIV-MARTINEZ

OMEGA SA,

Plaintiff,

vs.

THE INDIVIDUAL, BUSINESS ENTITY,
OR UNINCORPORATED ASSOCIATION
d/b/a THE E-COMMERCE STORE NAMES
IDENTIFIED ON SCHEDULE “A,”

Defendant.

/

REQUEST FOR CLERK’S ENTRY OF DEFAULT

Plaintiff, Omega SA (“Plaintiff”), by and through its undersigned counsel, hereby request that the Clerk enter default in this matter against Defendants, the Individual, Business Entity, or Unincorporated Association doing business as the e-commerce stores identified on Schedule “A” hereto (“Defendant”) on the ground that Defendant has 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 June 13, 2025 and June 18, 2025, Defendant was served with respective Summons and copies of the Complaint and Amended 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 No. 27-1, 27-2, 27-3 and 27-4, Affidavits of Service on file with the Court.)

Time allowed for Defendant to respond to the Complaint has expired. (Id. at ¶ 4.) Neither Plaintiff nor the Court has granted the Defendant 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 Plaintiffs’ attorneys of record. (Id. at ¶ 6.)

Plaintiff is informed and believes Defendant is not an infant or incompetent person. (Id. at ¶ 7.)

Plaintiffs are informed and believe that the Servicemembers Civil Relief Act does not apply.

(Id.)

WHEREFORE, Plaintiff, Omega SA, hereby requests that default be entered against Defendant, the Individual, Business Entity, or Unincorporated Association doing business as the e-commerce stores identified on Schedule “A” hereto.

DATED: July 16, 2025

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)

401 East Las Olas Blvd., #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

Attorneys for Plaintiff

SCHEDULE "A"

Defendant / Selling E-commerce Store Name
chrono24s.com
chrono24us.shop
aauda.top
aeetbz.top
aupzf.shop
awctnp.top
bbeip.shop
bcwzsf.top
bhacih.top
bdyntn.top
bysyjr.top
bzjebm.top
chicswave.com
chtmky.top
cixpk.shop
clvey.shop
cmiyhd.shop
enipuz.shop
euhaa.shop
eqlep.shop
euggcb.shop
fdoqo.shop
fefydn.top
fjlnx.shop
fjnuy.top
fmpeas.top
folrx.shop
fpeufa.shop
fszzca.top
ftetf.top
gcydc.top
gfdshop.shop
gfpft.shop
gkkrp.shop
gmhzg.shop
grsft.shop
haxyyr.top
hhfdw.shop
hrfpc.shop

Defendant / Selling E-commerce Store Name
hrqud.shop
hxnkqn.shop
ibgvlzk.com
ibwrg.shop
iurkc.shop
jhkc.shop
jiyxik.top
jwnpz.top
jydyco.shop
ltemu.com
mevzo.shop
mkuvk.shop
mnidnk.top
mtnasr.shop
mwtrhm.top
nfdxpi.top
nxgfi.top
nlcoc.top
npwnby.top
nzxygc.shop
oibko.shop
pkkhs.top
pntqb.shop
ppwknf.top
pqlut.shop
Psvrp.shop
qgkrb.shop
rgseo.shop
rqssov.shop
rmwatchs.life
sdoio.shop
smyei.top
srwzg.shop
sqnhu.top
successfullyy.shop
tolln.top
tpwiv.top
trendnestshub.com
unaejw.shop
ujghm.shop
ulegy.shop

Defendant / Selling E-commerce Store Name
ummxl.shop
unitedluxuryas.top
uvttl.shop
uylij.shop
vhqznf.shop
vpopda.shop
wctger.shop
wcqrsv.shop
wristhobbyist.com
wtchb.shop
wwpifcy.shop
wygsq.shop
xivan.shop
xsais.shop
yfkbva.shop
ygwxt.shop
ykbeu.shop
ziznr.top
zziifh.top
zqiwh.shop

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 16, 2025, 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 16th day of July 2025, via e-mail to the e-mail addresses at which Defendant was served and via website posting by posting a true and accurate copy of the following document(s) on the website <http://servingnotice.com/Qa1j0d/index.html> .

s:/Stephen M. Gaffigan/

Stephen M. Gaffigan