

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-21058-CIV-ALTMAN**

OMEGA SA,

Plaintiff,

vs.

THE INDIVIDUALS, BUSINESS ENTITIES,
AND UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

PLAINTIFF’S MOTION TO UNSEAL

Plaintiff Omega SA (“Plaintiff”), by and through its undersigned counsel, hereby moves this Court for an Order unsealing all documents that have been restricted/sealed from the Court docket and returning all portions of the Court file to the public records. As grounds therefore, Plaintiff states as follows:

1. On March 7, 2025, Plaintiff filed its Motion to File Under Seal, requesting Schedule “A” to Plaintiff’s Complaint and the Summonses be filed under seal [ECF No. 5].
2. The Court subsequently entered an Order granting Plaintiff’s Motion to File Under Seal [ECF No. 11] on March 18, 2025. Accordingly, Plaintiff filed Schedule “A” to Plaintiff’s Complaint, [ECF No. 12], and the Summonses, [ECF No. 13], under seal on March 19, 2025 and March 24, 2025, respectively.
3. On March 10, 2025, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets, together with the supporting Declarations and Exhibits (the “*Ex Parte* Application”) [ECF No. 6], pursuant to

Local Rule 5.4(d), which requires, unless the Court directs otherwise, *ex parte* filings be restricted from public view.

4. On March 18, 2025, the Court issued a Sealed Order Granting Plaintiff's *Ex Parte* Application for Entry of Temporary Restraining Order (the "Sealed Temporary Restraining Order") [ECF No. 9]. Upon receipt, Plaintiff served the Sealed Temporary Restraining Order on the requisite financial institution to restrain Defendants' financial accounts at issue.

5. Plaintiff has subsequently served Defendants with the Sealed Temporary Restraining Order, together with all other documents filed in this case.

6. As a seal on this matter is no longer required, Plaintiff respectfully requests this matter be unsealed and the portions of the docket relating to Plaintiff's *Ex Parte* Application, together with all other documents that have been restricted from the Court docket, be returned to the public portion of the Court file.

WHEREFORE, Plaintiff respectfully requests this Court issue an Order unsealing all documents filed with the Court that have been restricted from the Court docket and direct the Clerk to return those portions of the Court file to the public records.

Dated: March 27, 2025.

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., #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 Plaintiff, Omega SA

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 27, 2025, a true copy of the foregoing was served upon Defendants via e-mail by providing the address to Plaintiff's designated serving notice website to Defendants via the e-mail addresses provided by each Defendant as part of the data related to its e-commerce store, and by posting copies of the same on the URL appearing: <http://servingnotice.com/Qa9m7h/index.html>.

Virgilio Gigante
Virgilio Gigante