

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

OMEGA SA,

Plaintiff,

vs.

ELITETIMEPIECESUSA.COM, *et al.*

Defendants.

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**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, Omega SA ("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 I could and would testify competently to the matters set forth herein.

2. On March 7, 2025, Plaintiff filed its Complaint. (ECF No. 1) Plaintiff subsequently filed its Amended Complaint on March 27, 2025 (ECF No. 17) against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto (collectively, "Defendants").

3. On March 27, 2025, Defendant was served with their 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. (See ECF No. 20-1 and 20-2, 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.

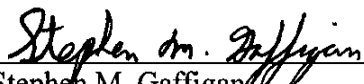
5. The Defendants have not been granted an extension of time to respond to the Complaint.

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 April 29, 2025, at Ft. Lauderdale, Florida.

  
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Stephen M. Gaffigan

**SCHEDULE "A"**

<b>Defendant Number</b>	<b>Defendant / E-commerce Store Name</b>
1	elitetimepiecesusa.com
1	coolsar.com
1	doxsd.com
1	atinowatch.com
1	luxyswear.com
1	opulencewrist.com
2	ksisx.shop
2	euex.shop
2	kibux.site
2	bezs.shop
2	bezs.shop
2	bezs.shop
2	slrw.shop
3	aniwattey.shop
4	zenithluxys.com
4	luxurytick.com
4	atinolux.com
4	relaxtee.com
5	jobuly.com
5	bedliy.com
6	camillaluxury.shop
7	chrono26.com
8	clonewatches.com
9	dennistoystore.com
10	dunekhing.com
10	weistwatch.com
10	kimmyis.com
10	sunfdht.com
11	gccista.shop
12	gclvg.com
13	getwatchpro.com
13	rallx.store
14	high-w.store
14	top-swisstime.com
15	hy-premium-watch.com
16	idc022.com
17	luxnob.com
18	luxtick.com
19	luxuriousluxurywardrobe.com

<b>Defendant Number</b>	<b>Defendant / E-commerce Store Name</b>
20	luxurywatchessthlm.com
21	luxuwatchs.com
22	luxyavia.com
23	menymoon.shop
24	nic-watch.com
25	ocga.store
26	panda188.store
27	pdkicks.com
28	premiumwatchs.com
29	sayhiyy.com
30	treasurk.com
31	trivorshop.com
32	vernaculars.shop
33	warringtac.shop
34	watchwsr.com
35	willy001.willyweb.shop