

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

OMEGA SA,

Plaintiff,

vs.

ELITETIMEPIECESUSA.COM, *et al.*

Defendants.

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 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 March 27, 2025, Defendants were 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. 20-1 and 20-2, 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 Plaintiffs' attorneys of record. (Id. at ¶ 6.)

Plaintiff is informed and believes Defendants could not be considered infants or incompetent persons. (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 Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” hereto.

DATED: April 29, 2025

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

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Attorneys for Plaintiff

SCHEDULE "A"

Defendant Number	Defendant / E-commerce Store Name
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

Defendant Number	Defendant / E-commerce Store Name
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	sayhiy.com
30	treasurk.com
31	trivorshop.com
32	vernaculars.shop
33	warringtac.shop
34	watchwsr.com
35	willy001.willyweb.shop

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 29, 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 29th day of April 2025, 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 <http://servingnotice.com/Qa9m7h/index.html> .

s:/Stephen M. Gaffigan/

Stephen M. Gaffigan