

**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 NOTICE OF IDENTIFICATION OF ADDITIONAL ALIASES FOR
DEFENDANT NUMBERS 1, 6, 10, 14, 16, AND 31 AND ADDITIONAL FINANCIAL
ACCOUNTS USED BY DEFENDANT NUMBERS 1, 4, 5, 6, 10, 14, 16, 22, 31, AND 34**

Plaintiff, Omega SA (“Omega” or “Plaintiff”), by and through its undersigned counsel, hereby notifies the Court of additional aliases for Defendant Numbers 1, 6, 10, 14, 16, and 31, and additional financial accounts used by Defendant Numbers 1, 4, 5, 6, 10, 14, 16, 22, 31, and 34 (“Defendants”), as identified on Schedule “A” hereto, to receive money in connection with their respective e-commerce stores operating under their seller names identified on Schedule “A” hereto (the “E-commerce Store Names”). In support thereof, Omega states as follows:

1. On March 7, 2025, Omega filed its Complaint [ECF No. 1] and on March 27, 2025, its Amended Complaint [ECF No. 17]. In its Amended Complaint, Omega pled Defendants use aliases in connection with the operation of their business, including but not limited to those identified on Schedule “A” thereto, and Defendants will likely continue to register or acquire new e-commerce store names, or other aliases, as well as related payment accounts, for the purpose of selling and offering for sale goods bearing and/or using counterfeit and confusingly similar imitations of one or more of Omega’s trademarks. (See [ECF No. 17] at ¶¶ 9, 13.) Pursuant to the

allegations in the Complaint, Omega now identify the following additional alias e-commerce store names:

- a. authentictimehub.com as an alias to Defendant coolsar.com (Defendant Number 1)
- b. jadeluxury.shop as an alias to Defendant camillaluxury.shop (Defendant Number 6)
- c. watcx.com as an alias to Defendant kimmyis.com (Defendant Number 10)
- d. clean-fac.shop as an alias to Defendant top-swisstime.com (Defendant Number 14)
- e. idc077.com as an alias to Defendant idc022.com (Defendant Number 16)
- f. woratime.com as an alias to Defendant trivorshop.com (Defendant Number 31)

(See Declaration of Kathleen Burns in Support of Plaintiff's Notice of Identification of Additional Aliases for Defendant Numbers 1, 6, 10, 14, 16, and 31 and Additional Financial Accounts Used by Defendant Numbers 1, 4, 5, 6, 10, 14, 16, 22, 31, and 34 ("Burns Decl. in Support of Notice") ¶ 6 and Schedule "B" thereto, filed herewith.)

2. On March 10, 2025, Omega filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the "Application for Temporary Restraining Order") [ECF No. 6]. Thereafter, on March 18, 2025, the Court entered an Order granting Plaintiff's Application for Temporary Restraining Order [ECF No. 9] and subsequently converted the Temporary Restraining Order into a Preliminary Injunction on April 18, 2025 [ECF No. 25].

3. In the Court's Temporary Restraining Order and subsequent Preliminary Injunction, the Court ordered, *inter alia*, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, Inc. (PayPal"), and their related companies and affiliates, to immediately:

identify all financial accounts and/or sub-accounts, associated with the Internet based e-commerce stores operating under the E-commerce Store Names, financial accounts, payees, Merchant IDs, WhatsApp telephone numbers, and/or the e-mail addresses identified on Schedule “A” hereto, as well as any other related accounts of the same customer(s) . . . which transfer funds into the same financial institution account(s) or any of the other financial accounts subject to this Order; (iii) restrain the transfer of all funds, as opposed to ongoing account activity, held or received for their benefit . . . and any other financial accounts tied thereto

(See Temporary Restraining Order [ECF No. 9] at p. 8, Para. 6; Preliminary Injunction [ECF No. 25] at pp. 7–8, Para. 6.)

4. Omega learned Defendant Numbers 1, 4, 5, 6, 10, 14, 16, 22, 31, and 34 are using the additional payment accounts identified on Schedule “A” hereto (the “Additional Financial Information”), to receive payment for the sale of counterfeit and infringing versions of Omega’s branded products in connection with their respective E-commerce Store Names. (See Burns Decl. in Support of Notice ¶ 5 and Composite Exhibit “1” attached thereto.)

5. Accordingly, pursuant to the Court’s Temporary Restraining Order and Preliminary Injunction, Omega requested PayPal restrain all funds using Defendants’ Additional Payment Accounts.

DATED: May 6, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Virgilio Gigante**

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SCHDULE “A”
DEFENDANT BY NUMBER, E-COMMERCE STORE NAME, AND
ADDITIONAL FINANCIAL ACCOUNT INFORMATION, AND MEANS OF CONTACT

Def. No	Defendant / E-commerce Store Name	Merchant ID / Payment Account	Payee	Means of Contact Email and WhatsApp
1	elitetimepiecesusa.com	EFRY2T6ZAVQMW		support@elitetimepiecesusa.com
1	authentictimehub.com	EFRY2T6ZAVQMW		support@authentictimehub.com
1	doxsd.com	HGDZHJFMUKFEG		support@doxsd.com
1	atinowatch.com	3ELZJYM6QRGRQ		support@atinowatch.com
1	luxyswear.com	C22KW6RKNRK64		support@luxyswear.com WhatsApp: 14793852889
1	opulencewrist.com	EFRY2T6ZAVQMW		support@opulencewrist.com WhatsApp: 14793852889
4	relaxtee.com	2SQZMXRUERKG6		contact@relaxtee.com WhatsApp: 16313199432
5	jobuly.com	xmjihejihe@gmail.com	厦门几何几何跨境电商有限公司	jobulywatch@gmail.com WhatsApp: 18182575506
6	jadeluxury.shop	customer@sideroper.com		Wathcesvipcenter@hotmail.com WhatsApp: 12135691925
10	watcx.com	Y77R25GBVXVAA	Jinghe New Town Yufeisong Department Store	info@gregdy.com 1544593053@qq.com
		jhdepartmentstore@163.com		
		8E9CZSE24E4CC	Yongan Qianran Department Store	WhatsApp: 15109774882; 8619835272209; 8613459507866
		qianrandepartment@163.com		
14	clean-fac.shop	B5U67ALVXD9VA	Weijin	clean.factory.shop@gmail.com WhatsApp: 16505078730
16	idc077.com	FJDMD57VD95A4	IDC SHOP	hitea777@outlook.com WhatsApp: 8613926757799

22	luxyavia.com	HGDZHJFMUKFEG		support@luxyavia.com
		YVU84G3QQ5TGQ		
31	woratime.com	VLQPJU6SCLE7L	woratime	rtvipwatch@hotmail.com rtwatchservice@hotmail.com
		CE22USGMFQYK6	woratime	WhatsApp: 8613229945610; 8617765281845
34	watchwsr.com	JKVH9XVQKJ858	丹阳市丹北镇王斌电子贸易商行（个体工商户）	higherwatch@outlook.com WhatsApp: 8613587735699

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 6, 2025, a true copy of the foregoing was served upon Defendants via the e-mail addresses at which Defendants were served, and by posting copies of the same on Plaintiff's designated service notice website appearing at the URL <https://servingnotice.com/Qa9m7h/index.html>.

Virgilio Gigante
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