

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.

**DECLARATION OF ANTOINE HALLER IN SUPPORT OF PLAINTIFF'S
MOTION FOR ENTRY OF DEFAULT FINAL JUDGMENT**

I, Antoine Haller, state and declare as follows:

1. I am over 18 years of age and have personal knowledge of the truth of the matters set forth herein. I submit this declaration in support of Plaintiff's Motion for Entry of Default Final Judgment against Defendants. If called as a witness, I could and would testify competently to the following facts set forth below.

2. I am employed by The Swatch Group Ltd. (the "Swatch Group") as Anti-Counterfeiting Officer in the Legal Department. Plaintiff Omega SA ("Omega") is a subsidiary of The Swatch Group Ltd., which is one of the world's largest watch manufacturers.

3. In my capacity as Anti-Counterfeiting Officer in the Legal Department, I am responsible for trademarks and other intellectual property rights enforcement and anti-counterfeiting matters throughout the world. As a result, I have been trained to identify the distinctions between Omega's genuine merchandise and non-genuine, counterfeit copies of the same.

4. 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 TRO”), [ECF No. 6]. I hereby incorporate by reference all factual allegations contained in my Declaration in Support of Omega’s Application for TRO, [ECF No. 6-1].

Investigation of Defendants’ Counterfeiting Activities

5. Omega learned that Defendant Numbers 1, 6, 10, 14, 16, and 31, were offering for sale watches bearing Omega’s trademarks at issue in this action (“Omega Marks”), without Omega’s authority, via the additional alias e-commerce store names identified on Schedule “A” hereto (the “Additional E-commerce Store Names”). (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. Prior to filing this Declaration, I reviewed the detailed web page captures of the Omega branded watches Omega’s investigator ordered via each of the Additional E-commerce Store Names and determined the watches were non-genuine, unauthorized versions of Omega’s branded watches. I reached this conclusion through the observation of the pricing, which is far below the prices of Omega’s genuine watches of similar style and design, and because Omega does not conduct business with Defendants, nor do Defendants have the right or authority to use the Omega Marks for any purpose. Additionally, I noted disclaimers on some of Defendants’ Additional E-commerce Store Names in which they expressly acknowledge the watches offered for sale thereon are “replica” and/or “1:1”. True and correct copies of the web page captures of the Omega branded watches Omega’s Investigator ordered, which were provided to Omega for review, are attached as Composite Exhibit “1” to the Burns Decl. in Support of Notice.

Statutory Damages Award

7. With the assistance of Omega's counsel, a chart has been prepared for the convenience of the Court providing an example of the trademarks counterfeited and types of goods offered for sale and/or sold per Defendant, including citations to the evidence. (See Exhibit "1" attached hereto; see also Composite Exhibit "1" to the Declaration of Kathleen Burns in Support of Plaintiff's *Ex Parte* Application for TRO, [ECF Nos. 6-5 through 6-7].) Although Omega's evidence demonstrates that many Defendants have counterfeited multiple trademarks on multiple types of goods, Omega is requesting a statutory damages award in the amount of \$1,000,000.00 against each Defendant as each Defendant used at least one counterfeit mark on one type of good.

8. Omega's damages request of \$1,000,000.00 against each Defendant would provide partial compensation to Omega and serve to deter the Defendants and others in similar businesses from continuing to counterfeit Omega's trademarks.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct. Executed this 05.05.2025 in Biel/Bienne, Switzerland.



Antoine Haller

SCHEDULE "A"
DEFENDANTS BY NUMBER AND ADDITIONAL
E-COMMERCE STORE NAME

Defendant Number	Defendant / Additional E- commerce Store Name
1	authentictimehub.com
6	jadeluxury.shop
10	watcx.com
14	clean-fac.shop
16	idc077.com
31	woratime.com