

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-20335-CIV-BLOOM**

RICHEMONT INTERNATIONAL SA,

Plaintiff,

vs.

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

Defendants.

PLAINTIFF’S MOTION TO UNSEAL

Plaintiff, Richemont International 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 January 23, 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. [6]. On January 23, 2025, the Court entered an Order granting Plaintiff’s Motion to File Under Seal, ECF No. [8], and Plaintiff subsequently filed Schedule “A” to Plaintiff’s Complaint, ECF No. [9], under seal on January 23, 2025, and the proposed Summonses ECF No. [14] under seal on January 27, 2025.

2. On January 23, 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. [10], pursuant to

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

3. On January 24, 2025, the Court issued a Sealed Order Granting *Ex Parte* Application for Entry of Temporary Restraining Order (the “Sealed Temporary Restraining Order”), ECF No. [13]. Upon receipt, Plaintiff served the Sealed Temporary Restraining Order on the requisite financial institutions to restrain Defendants’ financial accounts at issue.

4. As Plaintiff has confirmed the restraints of Defendants’ accounts and Plaintiff’s audit of those accounts, Plaintiff will now be serving Defendants with the Sealed Temporary Restraining Order, together with all other documents filed in this case.

5. 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 portions 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: January 30, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 30, 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 the e-mail addresses provided by each Defendant as part of the data related to its e-commerce store, including onsite contact forms, private messaging applications and/or services, or via the e-mail address for the designated Registrar for each of the e-commerce stores, and by posting copies of the same on the URL appearing: <http://servingnotice.com/RUM7tz/index.html>.

Stephen M. Gaffigan

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