

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

RICHEMONT INTERNATIONAL SA,

Plaintiff,

v.

AAAWATCH.TO, *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, Richemont International 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 January 22, 2025, Plaintiff filed its Complaint. (ECF No. 1) Plaintiff subsequently filed its Amended Complaint on January 31, 2025 (ECF No. 20) against Defendant, the Individual, Business Entity, or Unincorporated Association doing business as the e-commerce store names identified on the attached Schedule "A" hereto ("Defendant").

3. On February 4, 2025, Defendants were 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. 26-

1, 26-2 and 26-3, 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.

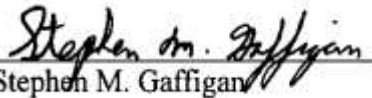
5. The Defendants have not been granted an extension of time to respond to the Complaint.

6. The Defendants has failed to answer or otherwise respond to the Complaint, or serve a copy of the Answer or other response upon Plaintiffs attorneys of record.

7. I am informed and believes that Defendants are not 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 March 4, 2025, at Ft. Lauderdale, Florida.

  
Stephen M. Gaffigan

**SCHEDULE "A"**

<b>Defendant Number</b>	<b>Defendant / E-commerce Store Name</b>
1	aaawatch.to
2	astonishing.top
2	fashiones.top
3	bestwatches.to
4	betterlifego.com
4	shoefactory.top
5	blog.12h.to
6	buyonbest.com
6	bobjewelry.com
7	cashial.online
7	grgdger.online
8	cheercash.online
9	chicstime.com
10	chris-luxury.shop
11	clothes.nu
12	cloverjw.com
13	cnxscs.store
13	cysenwk.shop
13	yewugu.store
13	kwsdrfh.shop
14	daxiewatch.shop
15	emuobag.shop
15	wwcbag.shop
15	zvldbag.shop
16	ffluxury.top
17	getjewelrys.com
18	gilltime.com
19	goodv-jewellery.store
19	goodv-jewellery.com
20	iwcwatch.life
21	jeordwatch.co
22	kernelluxuy.com
22	supermanluxury.com
23	kohvjewelry.com
24	marielco.com
25	mqszy.shop
25	sdyy.shop
26	primetickers.com
27	puhjfyhj.online
28	rariate.com

<b>Defendant Number</b>	<b>Defendant / E-commerce Store Name</b>
29	replicabest.store
30	repicaluxuryshop.com
31	replicawatch.shop
32	replicawatchesworld.com
33	replicawrist.com
34	repwatchplug.com
35	royal-jewelry.shop
36	shoppingservices.top
36	us.watchswiss.top
37	storeluxury.top
38	superreplica.shop
39	swisswatchesf.com
39	watchesdd.com
40	tickunique.is
41	vincyrep.ru