

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

RICHEMONT INTERNATIONAL SA,

Plaintiff,

v.

AAAWATCH.TO, *et al.*,

Defendants.

REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiff, Richemont International SA ("Plaintiff"), by and through its undersigned counsel, hereby request that the Clerk enter default in this matter against Defendants, the Individuals, Business Entities, or Unincorporated Associations identified on the attached Schedule "A" hereto ("Defendants") on the ground that Defendants has 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 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. (Gaffigan Decl. ¶ 3; see ECF No. 26-1, 26-2 and 26-3, 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 Plaintiff's attorneys of record. (Id. at ¶ 6.) Plaintiff is informed and believes that Defendants are not infants or incompetent persons. (Id. at ¶ 7.) Plaintiff is informed and believes that the Servicemembers Civil Relief Act does not apply. (Id.)

WHEREFORE, Plaintiff, Richemont International SA, requests that default be entered against Defendants, the Individuals, Business Entities, or Unincorporated Associations identified on the attached Schedule "A" hereto.

DATED: March 4, 2025

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: /Stephen M. Gaffigan/

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Attorneys for Plaintiff

SCHEDULE "A"

Defendant Number	Defendant / E-commerce Store Name
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	zvldbog.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	mqsz.shop
25	sdyy.shop
26	primetickers.com
27	puhjfyhj.online

Defendant Number	Defendant / E-commerce Store Name
28	rariate.com
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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 4, 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 4th day of March 2025, via e-mail to the e-mail addresses where 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/RUM7tz/index.html>.

s:/Stephen M. Gaffigan/
Stephen M. Gaffigan