

**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 NOTICE OF IDENTIFICATION OF ADDITIONAL ALIASES
FOR DEFENDANT NUMBERS 11-12 AND ADDITIONAL PAYMENT ACCOUNTS
USED BY DEFENDANT NUMBERS 5, 11-12, 18, 25, 33, 37 AND 41**

Plaintiff, Richemont International SA (“Plaintiff”), by and through its undersigned counsel, hereby notifies the Court of an additional aliases for Defendant Numbers 11-12 and additional payment accounts used by Defendant Numbers 5, 11-12, 18, 25, 33, 37 and 41, as identified on Schedule “A” hereto (“Defendants”), 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, Plaintiff states as follows:

1. On January 31, 2025, Plaintiff filed its Amended Complaint, ECF No. [20]. In its Amended Complaint, Plaintiff pled Defendants use aliases in conjunction with the operation of their business, 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 offering for sale and/or selling goods bearing and/or using counterfeit and confusingly similar imitations of one or more of Plaintiff’s trademarks. (See ECF No. [20] at ¶¶ 10, 14.) Pursuant to the allegations, Plaintiff now identifies the additional e-commerce store name, timesru.com, as an alias to

Defendant Number 11 and the additional e-commerce store name, fbonline.shop, as an alias to Defendant Number 12. (See Declaration of Kathleen Burns in Support of Plaintiff's Notice of Identification of Additional Aliases for Defendant Numbers 11-12 and Additional Payment Accounts Used by Defendant Numbers 5, 11-12, 18, 25, 33, 37 and 41 ["Burns Decl. in Support of Notice"] ¶ 5 n.1 and Composite Exhibit "1" attached thereto, filed herewith.)

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 (the "Application for Temporary Restraining Order"), ECF No. [10]. Thereafter on January 24, 2025, the Court entered an Order granting Plaintiff's Application for Temporary Restraining Order, ECF No. [13] and subsequently converted the Temporary Restraining Order into a Preliminary Injunction on February 6, 2025, ECF No. [24].

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, the payment accounts, payees, merchant identification numbers, and/or the e-mail addresses identified on Schedule "A" hereto, as well as any other related accounts of the same customer(s) . . . that transfer funds into the same financial institution account(s), and/or any of the other financial accounts subject to this Order . . . 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 Preliminary Injunction ECF No. [24] at pp. 10-11, Para. 6.

4. Plaintiff discovered various Defendants, as identified on Schedule "A" hereto, are using the financial account information also identified on Schedule "A" hereto (the "Additional Financial Information"), to receive money in connection with their respective E-commerce Store

Names. (See Burns Decl. in Support of Notice ¶ 5 and Composite Exhibit “1” attached thereto, filed herewith.)

5. Accordingly, pursuant to the Court’s February 6, 2025 Preliminary Injunction, Plaintiff has requested PayPal restrain all funds using Defendants’ Additional Financial Information.

DATED: March 12, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

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SCHEDULE "A"
DEFENDANTS BY NUMBER, E-COMMERCE STORE NAME,
ADDITIONAL E-COMMERCE STORE NAME, AND
ADDITIONAL PAYMENT ACCOUNT INFORMATION

Def. No.	Defendant / E-Commerce Store Name	Defendant / Additional E-Commerce Store Name	Additional Payee	Additional Merchant ID	Additional PayPal	Additional Contact Information
5	blog.12h.to		王锋		doernerzara@gmail.com	WhatsApp: +852 5263 8029
11	clothes.nu	timesru.com			kei227@outlook.com	pursesde@gmail.com
12	cloverjw.com			8U3Q3R26WZ GCQ		em15336681973@gmail.com shopify_jewelry@163.com
12		fbonline.shop		8U3Q3R26WZ GCQ		support@luxe-us.com shopify_jewelry@163.com em15336681973@gmail.com
18	gilltime.com		rotwa	SZFZBCZ73V AQ8		rtvipwatch@hotmail.com watchvipservice@hotmail.com
25	mqszy.shop			HN5XTHUCQ LJGG UEPT2DD8GG QKG		
33	replicawrist.com				lisamoram9@gmail.com	
37	storeluxury.top			3ED2C6JTBVS J2		support2@wppay.online
41	vincyrep.ru		睿翰 曾		zusong-2024@outlook.com jiangzhou-2022@outlook.com Ruihan-2022@outlook.com	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was served this 12th day of March, 2025, upon Defendants identified on Schedule “A” hereto via the e-mail accounts 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 registrar of record for each of the e-commerce stores, and by posting copies of the same on Plaintiff’s Website appearing at: <http://servingnotice.com/RUM7tz/index.html>.

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