

**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.

**DECLARATION OF EMMA-JANE TRITTON IN SUPPORT OF PLAINTIFF’S
MOTION FOR ENTRY OF DEFAULT FINAL JUDGMENT**

I, Emma-Jane Tritton, 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 (the “Motion for Default Judgment”) against Defendants, the Individuals, Business Entities, and Unincorporated Associations Identified on Schedule “A” thereto (“Defendants”). If called upon to do so, I could and would testify competently to the following facts set forth below.

2. I am employed by Richemont International Limited in the Intellectual Property Department as Lead Counsel, Anti-Counterfeiting and Brand Protection. I have been employed by Richemont International Limited since 2013. Richemont International Limited is an affiliate of Compagnie Financière Richemont SA. Plaintiff, Richemont International SA (“Plaintiff”), is a subsidiary of Compagnie Financière Richemont SA, which is one of the world’s leading luxury goods groups.

3. In my capacity as Lead Counsel, Anti-Counterfeiting and Brand Protection in Richemont International Limited’s Intellectual Property Department, I coordinate intellectual

property matters and help manage Plaintiff's anti-counterfeiting efforts in North America. As a result, I am fully familiar with most aspects of the manufacture, sale, and distribution of genuine versions of Plaintiff's products, and I have been trained to identify the distinctions between genuine merchandise and counterfeit copies of the same.

4. 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 TRO"), ECF No. [10]. I hereby incorporate by reference all factual allegations contained in my declaration filed in support of Plaintiff's Application for TRO, ECF No. [10-1]. On January 24, 2025, the Court granted Plaintiff's Application for TRO, ECF No. [13], and subsequently converted the Temporary Restraining Order into a Preliminary Injunction on February 6, 2025, ECF No. [24].

Statutory Damages Award

5. With the assistance of Plaintiff'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. As reflected in the chart, Plaintiff calculated the statutory damages awards by starting with a baseline of \$20,000.00, trebled to reflect Defendants' willfulness, and doubled for the purpose of deterrence, resulting in \$120,000.00 per trademark counterfeited per type of good offered for sale and/or sold per Defendant. (See Exhibit "1" hereto.) Plaintiff then multiplied the \$120,000.00 baseline number by the number of Plaintiff's Marks counterfeited and the number of different types of goods offered for sale and/or sold to Plaintiff's investigator, as reflected in the evidence submitted for each Defendant as Composite Exhibit "1" to the Declaration of Kathleen Burns in Support of Plaintiff's Application for Temporary Restraining Order ["Burns Decl."], ECF Nos. [10-4] through [10-6]

and Composite Exhibit “1” to the 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, ECF No. [30-2]. Although Plaintiff’s evidence demonstrates that many Defendants have counterfeited multiple trademarks on multiple types of goods, Plaintiff is basing its calculation of its statutory damages awards on the types of goods ordered by Plaintiff’s investigator.

6. Plaintiff’s damages request of \$120,000.00 per trademark counterfeited per type of good offered for sale and/or sold against each Defendant, as calculated per Defendant in Exhibit “1” hereto, falls in line with meeting the statutory goals of providing partial compensation to Plaintiff and serves to deter Defendants and others in similar businesses from continuing to counterfeit Plaintiff’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 on: 2025-03-18 in London, England.

Emma-Jane Tritton

EMMA-JANE TRITTON