

**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.

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**DECLARATION OF STEPHEN M. GAFFIGAN IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT FINAL JUDGMENT**

I, Stephen M. Gaffigan, declare and state as follows:

1. I am an attorney for Plaintiff, Richemont International SA ("Plaintiff"), in the above captioned action. I submit this Declaration in support of Plaintiff's Motion for Entry of Default Final Judgment against Defendants, the Individuals, Business Entities, and Unincorporated Associations Identified on Schedule "A" to Plaintiff's Motion for Entry of Default Final Judgment (collectively "Defendants"). I am personally knowledgeable of the matters set forth in this Declaration and, if called upon to do so, I could and would competently testify to the following facts set forth below.

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 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. [10-2].

3. On January 24, 2025, this 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]. The Temporary Restraining Order and Preliminary Injunction required, *inter alia*, PayPal, Inc. (“PayPal”), and their related companies and affiliates, to identify and restrain all funds in Defendants’ associated payment accounts, including all related financial accounts tied to, used by, or that transmit funds into, the respective Defendants’ financial accounts, and divert those funds to a holding account for the trust of the Court. Subsequently, my firm received notice from the applicable financial institution that it complied with the requirements of the Court’s Orders.

**RE: ENTRY OF DEFAULT FINAL JUDGMENT**

4. On January 22, 2025, Plaintiff filed its Complaint ECF No. [1] and on January 31, 2025, its Amended Complaint for Damages and Injunctive Relief against Defendants, ECF No. [20].

5. On January 23, 2025, Plaintiff filed its *Ex Parte* Motion for Order Authorizing Alternate Service of Process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) ECF No. [11], which the Court granted on January 24, 2025, ECF No. [12], authorizing Plaintiff to serve the Summonses, Complaint, and all filings and discovery in this matter upon Defendants via electronic mail (“e-mail”) and via Plaintiff’s designated serving notice website by posting copies of the same on the Internet website appearing at the URL <http://servingnotice.com/RUM7tz/index.html>.

6. Pursuant to the Court’s Order, on February 4, 2025, Defendants were served with their respective Summons and a copy of the Amended Complaint via e-mail service and website posting. (See ECF No. [26], Proof of Service on file with the Court.)

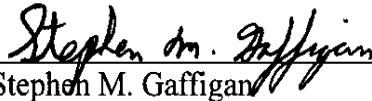
7. The time allowed for Defendants to respond to the Amended Complaint has expired.

8. To date, Defendants have not filed any responsive pleadings to the Amended Complaint, have not requested an enlargement of time to respond to the Amended Complaint, nor have Defendants entered a formal appearance *pro se* or by counsel on their behalf.

9. I am informed and believe none of the Defendants are infants or incompetent persons, and, upon information and belief, the Servicemembers Civil Relief Act does not apply.

10. On March 4, 2025, Plaintiff filed its Request for Clerk's Entry of Default as to Defendants, ECF No. [27], and the Clerk entered default against Defendants on March 5, 2025, for failure to plead or otherwise defend pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, ECF No. [28].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed the 18<sup>th</sup> day of March, 2025, at Hollywood, Florida.

  
Stephen M. Gaffigan