

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-21134-CIV-RUIZ**

RICHEMONT INTERNATIONAL SA,

Plaintiff,

v.

ALLSWISSWATCHS.COM, *et al.*,

Defendants.

**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 March 11, 2025, Plaintiff filed its Complaint. (ECF No. 1) Plaintiff subsequently filed its Amended Complaint on March 18, 2025 (ECF No. 12) 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").

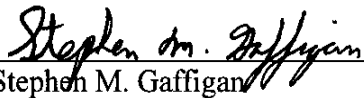
3. On March 20, 2025 and March 21, 2025, Defendants were served with their respective Summons and copies of the Complaint and Amended Complaint via electronic mail ("e-mail") and via website posting pursuant to the Court's Order authorizing alternate service of

process. (See ECF No. 20-1, 20-2, 20-3 and 20-4, 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 April 23, 2025, at Ft. Lauderdale, Florida.



Stephen M. Gaffigan

SCHEDULE "A"

Defendant Number	Defendant / E-commerce Store Name
1	allswisswatchs.com
1	allwatchesen.com
1	bestwatchss.com
1	swissrepicass.com
1	swisswatchesale.com
2	any-replica-watches.com
2	arwwatchpro.com
3	bestcartierrep.com
4	bestfakejewelry.com
4	luxuryjewelrywarehouse.com
5	buywatchesindubai.com
5	replicawatchesinuae.com
5	superclonewatchesdubai.com
6	chreplica.is
6	clean-factory.is
7	clonewatch.is
8	dubai-watchesuae.com
9	hagobuy.ru
10	geektime.watch
11	getwatches.ru
12	giftwatchesboutique.in
13	goldluxurys.com
14	hellorolex.watch
15	hontwatch-replica.si
16	hotwatchsreplica.com
16	replicawatchshop.cc
17	intime06.co
18	iwatchclone.co
19	luxe-us.com
20	myswissclones.com
20	super-clones.com
20	swissauth.com
20	swissclones.com
21	perfectrepwatches.com
22	relojesreplicastarlujos.com
23	replicaorologi.co
24	replicawatchescheap.com
24	reptime.us
25	replicawatchesusa.com

Defendant Number	Defendant / E-commerce Store Name
25	royal-watches-pakistan.com.pk
25	Royalwatchespakistan.com.pk
25	timezone.com.pk
26	replicawatchtr.com
27	rolexreplica.design
28	ukwatches.io
28	ukshop.io
29	watchcopiesale.co
30	18kcoraljewelry.com