

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

RICHEMONT INTERNATIONAL SA,

Plaintiff,

v.

ALLSWISSWATCHS.COM, *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 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. (Gaffigan Decl. ¶ 3; see ECF No. 20-1, 20-2, 20-3 and 20-4, 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: April 23, 2025

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

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Attorneys for Plaintiff

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	hotwatchesreplica.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

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 23, 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 23rd day of April 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/Rsf5ca/index.html>.

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