

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

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 March 12, 2025, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order and Preliminary Injunction (the "Application for TRO") [ECF No. 8]. I hereby incorporate by reference all factual allegations contained in my declaration filed in support of Plaintiff's Application for TRO [ECF No. 8-1]. On March 18, 2025, the Court granted Plaintiff's Application for TRO [ECF No. 10] and subsequently converted the temporary restraining order into a preliminary injunction on March 31, 2025 [ECF No. 22].

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. (See Exhibit "1" hereto; see also Composite Exhibit "1" to the Declaration of Stephen M. Gaffigan in Support of Plaintiff's Application for TRO, [ECF Nos. 8-3, 8-4].) Although Plaintiff's evidence demonstrates that each Defendant has counterfeited multiple trademarks on at least one type of good, Plaintiff is requesting a statutory damages award in the amount of \$1,000,000.00 against each Defendant as each Defendant used at least one counterfeit mark on one type of good.

6. Plaintiff's damages request of \$1,000,000.00 against each Defendant falls in line with meeting the statutory goals of compensation to Plaintiff and serves as a deterrence to 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: 2025-04-21 in London, England.

Emma-Jane Tritton

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