

**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 STEPHEN M. GAFFIGAN IN SUPPORT OF
PLAINTIFF’S MOTION FOR ENTRY OF
DEFAULT FINAL JUDGMENT AGAINST DEFENDANTS**

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

1. I am an attorney duly authorized and licensed to practice law before all courts in the State of Florida and the Southern District of Florida. I am counsel of record for Plaintiff, Richemont International SA (“Plaintiff”), in the above captioned action. I submit this declaration, which is filed in support of Plaintiff’s Motion for Entry of Default Final Judgment (“Motion for DFJ”) against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” attached to Plaintiff’s Motion for DFJ (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 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. 8-2].

3. 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].

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4. On March 11, 2025, Plaintiff filed its Complaint [ECF No. 1] and on March 18, 2025, its Amended Complaint for Injunctive Relief and Damages in this action against Defendants [ECF No. 12].

5. On March 12, 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) ("Motion for Alternate Service") [ECF No. 9], which the Court granted on March 18, 2025 [ECF No. 11], authorizing Plaintiff to serve the Summonses, Complaint, and all filings and discovery in this matter upon Defendants via electronic mail ("e-mail") and by publicly posting copies of the same on Plaintiff's serving notice website appearing at the URL <http://servingnotice.com/Rsf5ca/index.html>.

6. Pursuant to the Court's Order Granting Plaintiff's Motion for Alternate Service, Plaintiff served Defendants with their respective Summons and a copy of the Amended Complaint via e-mail service and via website posting on March 20, 2025 and March 21, 2025. (See [ECF No. 20], Proof of Service on file with the Court.)

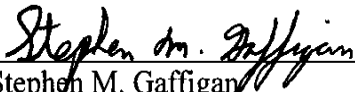
7. The time allowed for Defendants to respond to the Amended Complaint has expired.

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 that none of the Defendants are infants or incompetent persons, and, upon information and belief, the Servicemembers Civil Relief Act does not apply.

10. On April 23, 2025, Plaintiff filed its Request for Clerk's Entry of Default [ECF No. 23], and the Clerk subsequently entered default against each Defendant on April 24, 2025 for failure to plead or otherwise defend pursuant to Rule 55(a) of the Federal Rules of Civil Procedure [ECF No. 24].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 25th day of April, 2025, at Hollywood, Florida.


Stephen M. Gaffigan