

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 24-24178-CIV-BECERRA

TIFFANY (NJ) LLC,

Plaintiff,

vs.

THE INDIVIDUALS, BUSINESS ENTITIES,
AND UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A,"

Defendants.

PLAINTIFF'S MOTION TO UNSEAL

Plaintiff, Tiffany (NJ) LLC ("Plaintiff"), by and through its undersigned counsel, hereby moves this Court for an Order unsealing all documents that have been restricted/sealed from the Court docket and returning all portions of the Court file to the public records. As grounds therefore, Plaintiff states as follows:

1. On October 30, 2024, Plaintiff filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets, together with the supporting Declarations and Exhibits (the "*Ex Parte* Application") ECF No. [6], pursuant to Local Rule 5.4(d), which requires, unless the Court directs otherwise, *ex parte* filings be restricted from public view.

2. On November 7, 2024, the Court issued a Sealed Order Granting *Ex Parte* Application for Entry of Temporary Restraining Order (the "Sealed Temporary Restraining Order") and scheduling a hearing in connection with Plaintiff's Motion for Preliminary Injunction, ECF No. [9]. Upon receipt, Plaintiff served the Sealed Temporary Restraining Order on the requisite financial institutions to restrain Defendants' financial accounts at issue.

3. As Plaintiff confirmed the restraints of Defendants' accounts and Plaintiff's audit of those accounts, Plaintiff will be serving Defendants with the Sealed Temporary Restraining Order, together with all documents filed in this case.

4. As a seal on this matter is no longer required, Plaintiff respectfully requests this matter be unsealed and the portions of the docket relating to Plaintiff's *Ex Parte* Application, together with all other documents that have been restricted/sealed from the Court docket,¹ be returned to the public portion of the Court file.²

WHEREFORE, Plaintiff, Tiffany (NJ) LLC, respectfully requests this Court issue an Order unsealing all documents filed with the Court that have been restricted/sealed from the Court docket and direct the Clerk to return those portions of the Court file to the public records.

DATED: November 18, 2024.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez (Fla. Bar. No. 103372)

401 East Las Olas Blvd., Suite 130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: stephen@smgpa.cloud

E-mail: leo@smgpa.cloud

E-mail: raquel@smgpa.cloud

Attorneys for Plaintiff TIFFANY (NJ) LLC

¹ In accordance with Local Rule 5.4(d), Docket Entries 7, 10-11 are also restricted from the Court's docket as they reference Plaintiff's *Ex Parte* Application.

² Although the November 7, 2024 Sealed Temporary Restraining Order directs Plaintiff to move to unseal the docket in this case "once service has been effectuated upon all Defendants" (see Sealed Temporary Restraining Order, Para. 22 at p. 16), Plaintiff is respectfully moving to unseal so that the docket can be made public as Plaintiff is contemporaneously providing Defendants with notice of this matter.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 18, 2024, a true copy of the foregoing was served upon Defendants via e-mail by providing the address to Plaintiff's designated serving notice website to Defendants via the e-mail addresses provided by each Defendant as part of the data related to its e-commerce store, including customer service e-mail addresses, onsite contact forms, and private messaging applications and/or services, or via the e-commerce platform or the designated registrar of record that Defendants use to conduct their commercial transactions, and by posting copies of the same on the URL appearing: <http://servingnotice.com/TB29mE/index.html>.

Stephen M. Gaffigan
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