

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

TIFFANY (NJ) LLC,

Plaintiff,

vs.

CCFASHIONJEWELRY.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, Tiffany (NJ), LLC (“Plaintiff”) in the above-captioned matter. I make this Declaration 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 October 28, 2024, Plaintiff filed its Complaint. (ECF No. 1) Plaintiff subsequently filed its Amended Complaint on November 27, 2024 (ECF No. 25) against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule “A” hereto (collectively, “Defendants”).

3. On December 4-6, 2024 and December 11, 2024, 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. 26-1, 26-2, 26-3, 26-4 and 26-5, 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 have failed to answer or otherwise respond to the Complaint, or serve a copy of the Answer or other response upon Plaintiff's attorneys of record.
7. I am informed and believe none of the Defendants are 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 January 2, 2025, at Ft. Lauderdale, Florida.

  
Stephen M. Gaffigan

**SCHEDULE "A"**

<b>Defendant Number</b>	<b>Defendant / E-commerce Store Name</b>
1	ccfashionjewelry.com
2	blingblings.es
3	classport.shop
4	cocoshoes.top
5	correctkickz.com
6	eleger.co
7	eukick.com
8	evelynsneaker.com
9	fcmg-sales.com
9	saleluxurycn.com
10	fossilry.cc
11	getreadys.org
12	greenutilityltd.online
13	jewelrybuild.com
14	Jinyi Shoes retail wholesale a.k.a. +8619359440554 a.k.a. 俊弟aj LJR版（本地支持送货上门）
15	jwfancy.com
16	kaideck.shop
17	kailin44088 a.k.a. luxury goods
18	kickspk.com
18	kickssu.org
19	kolobag.com
20	koolmaker.com
21	kw-store.top
22	lalsoft.com a.k.a. fspbo.shop a.k.a. kegegegghh.shop
23	luxere.top
24	maikesneakers111.com
25	matoyli.com
25	testegrila.com
26	monicasneaker.im
27	niosneaker.com

<b>Defendant Number</b>	<b>Defendant / E-commerce Store Name</b>
28	obosneaker.com
29	oldsnkrs.shop
30	persting.live
31	poposhoes.top
32	sneakershop.ww
33	sneakerssport789
34	snkrsclub.cc
35	topfactory2166
36	usasiha.shop
37	worlsoccer.com
38	xsir.product a.k.a. welcome to xsir
39	zzmoonz.com a.k.a. zzmoonz.shop