

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

TIFFANY (NJ) LLC,

Plaintiff,

vs.

CCFASHIONJEWELRY.COM, *et al*

Defendants.

---

**REQUEST FOR CLERK'S ENTRY OF DEFAULT**

Plaintiff, Tiffany (NJ), LLC ("Plaintiff"), by and through its undersigned counsel, hereby request that the Clerk enter default in this matter against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto (collectively "Defendants") on the ground that Defendants have 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 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. (Gaffigan Decl. ¶ 3; see ECF No. 26-1, 26-2, 26-3, 26-4 and 26-5, 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 none of the Defendants could be considered infants or incompetent persons. (Id. at ¶ 7.) Plaintiff is informed and believes that the Servicemembers Civil Relief Act does not apply. (Id.)

WHEREFORE, Plaintiff, Tiffany (NJ), LLC, requests that default be entered against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto.

DATED: January 2, 2025

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)

Christine Ann Daley (Fla. Bar No. 98482)

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

E-mail: Christine@smgpa.cloud

*Attorneys for Plaintiff*

**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. kegegeggghh.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

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 2, 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 2<sup>nd</sup> day of January 2025, via e-mail to the e-mail addresses at which 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/TB29mE/index.html>.

s:/Stephen M. Gaffigan/

Stephen M. Gaffigan