

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 NOTICE OF IDENTIFICATION OF ADDITIONAL FINANCIAL
ACCOUNT USED BY DEFENDANT NUMBER 27**

Plaintiff, Tiffany (NJ) LLC (“Plaintiff” or “Tiffany”), by and through its undersigned counsel, hereby gives notice to the Court of its identification of an additional financial account used by Defendant niosneaker.com (“Defendant Number 27”) to receive money in connection with the sale of Tiffany branded goods through its respective e-commerce store operating under the seller name identified on Schedule “A” hereto (the “E-commerce Store Name”). In support thereof, 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 (the “Application for Temporary Restraining Order”) [ECF No. 6].¹ On November 7, 2024, the Court entered an Order granting Plaintiff’s Application for Temporary Restraining Order [ECF No. 9], and subsequently converted the Temporary Restraining Order into a Preliminary Injunction on November 21, 2024 [ECF No. 21, docketed Nov. 22, 2024].

¹ Plaintiff hereby incorporates by reference its *Ex Parte* Application for Temporary Restraining Order, together with supporting declarations and exhibits.

2. In the Court's Temporary Restraining Order and subsequent Preliminary Injunction, the Court ordered, *inter alia*, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to, PayPal, Inc. ("PayPal") and Stripe, Inc. ("Stripe"), and their related companies and affiliates (each, a "Third Party," and collectively, the "Third Parties") to immediately:

identify all financial accounts and/or sub-accounts, associated with the Internet based e-commerce stores operating under the E-commerce Store Names, payees, merchant identification numbers, financial accounts, e-mail addresses, and/or telephone contact numbers identified on Schedule "A" hereto, as well as any other related accounts of the same customer(s). . . which transfer funds into the same financial institution account(s) or any of the other financial accounts subject to this Preliminary Injunction. . . restrain the transfer of all funds, as opposed to ongoing account activity, held or received for their benefit . . . and any other financial accounts tied thereto. . . .

See Preliminary Injunction [ECF No. 21] at pp. 11-12, Para. 6.

3. Plaintiff discovered Defendant Number 27 is using the additional financial account identified on Schedule "A" hereto (the "Additional Financial Account"), to receive money in connection with the sale of Tiffany branded goods through its E-commerce Store Name. (See Declaration of Kathleen Burns in Support of Plaintiff's Notice of Identification of Additional Financial Account Used by Defendant Number 27 and Composite Exhibit "1" attached thereto, filed herewith.)

4. Accordingly, pursuant to the Court's November 21, 2024 Preliminary Injunction Plaintiff has requested PayPal restrain all funds using Defendant Number 27's Additional Financial Account.

DATED: January 3, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Stephen M. Gaffigan**

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SCHEDULE "A"
DEFENDANTS BY E-COMMERCE STORE NAME AND
ADDITIONAL FINANCIAL ACCOUNT

Def. No.	Defendant / E-commerce Store Name	PayPal Payee	Merchant ID / Transaction Info	PayPal E- mail	Additional Means of Contact Information
27	niosneaker.com	厦门葡萄柚网络 科技有限公司 @Putau	Z29UC6FJG2 WWA	alexuping913 @gmail.com	niosneaker@gm ail.com stockxhouse@g mail.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true copy of the foregoing was served this 3rd day of January, 2025, on Defendant Number 27 via the e-mail accounts by providing the address to Plaintiff's designated serving notice website to Defendant Number 27 via the e-mail addresses provided by Defendant Number 27 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 Defendant Number 27 uses to conduct its commercial transactions, and by posting copies of the same on the URL appearing at: <http://servingnotice.com/TB29mE/index.html>.

Stephen M. Gaffigan

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