

**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.

**DECLARATION OF ANNABELLE GRESETH IN SUPPORT OF
PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT FINAL JUDGMENT**

I, Annabelle Greseth, state and declare as follows:

1. I am over 18 years of age and have personal knowledge of the truth of the matters set forth herein. I submit this declaration in support of Plaintiff's Motion for Entry of Default Final Judgment (the "Motion for Default Judgment") against Defendants, the Individuals, Business Entities, and Unincorporated Associations Identified on Schedule "A" thereto ("Defendants"). If called upon to do so, I could and would testify competently to the following facts set forth below.

2. I am employed by Tiffany (NJ) LLC ("Tiffany") as Brand Protection Analyst. Tiffany is a Delaware limited liability company with its principal place of business in the United States located at 15 Sylvan Way, Parsippany, New Jersey 07054.

3. In my capacity as Tiffany's Brand Protection Analyst, I am responsible, in part, for Tiffany's trademark and anti-counterfeiting efforts in the United States. As a result, I am fully familiar with most aspects of the manufacture, sale, and distribution of genuine Tiffany products, and I have been trained to identify the distinctions between genuine Tiffany merchandise and counterfeit copies of the same.

4. On October 30, 2024, Tiffany filed its *Ex Parte* Application for Entry of Temporary Restraining Order, Preliminary Injunction, and Order Restraining Transfer of Assets (the “Application for TRO”), ECF No. [6]. I hereby incorporate by reference all factual allegations contained in my declaration filed in support of Tiffany’s Application for TRO, ECF No. [6-1]. On November 7, 2024, the Court granted Plaintiff’s Application for TRO, ECF No. [9], and subsequently converted the temporary restraining order into a preliminary injunction on November 21, 2024, ECF No. [21].

Statutory Damages Award

5. With the assistance of Tiffany’s counsel, a chart has been prepared for the convenience of the Court providing an example of the trademarks counterfeited and types of goods offered for sale and/or sold per Defendant, including citations to the evidence. (See Exhibit “1” hereto.) As reflected in the chart, Tiffany calculated its requested statutory damages award of \$100,000.00 per trademark counterfeited per type of good offered for sale and/or sold per Defendant. (See id.) Specifically, Tiffany multiplied its requested statutory damages award of \$100,000.00 by the number of Tiffany marks counterfeited and the number of different types of goods offered for sale and/or sold by each Defendant to Tiffany’s investigator, as reflected in the evidence submitted for each Defendant as Composite Exhibit “1” to the Declaration of Kathleen Burns in Support of Plaintiff’s Application for TRO, ECF Nos. [6-4] through [6-5], and Composite Exhibit “1” to the Declaration of Kathleen Burns in Support of Plaintiff’s Notice of Identification of Additional Financial Account Used By Defendant Number 27, ECF No. [29-2].

6. Tiffany’s damages requests of \$100,000.00 per Tiffany Mark counterfeited per type of good offered for sale and/or sold against each Defendant, as calculated per Defendant in Exhibit “1” hereto, falls in line with meeting the statutory goals of partial compensation to Tiffany and

serves as a deterrence to the Defendants and others in similar businesses from continuing to counterfeit Tiffany's trademarks.

I declare under penalty of perjury under the laws of the United States of America that the foregoing statements are true and correct.

Executed on: 2025-01-07 in Louisville, Kentucky.

Annabelle Greseth

ANNABELLE GRESETH