

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 25-21814-CIV-BECERRA**

TIFFANY (NJ) LLC,

Plaintiff,

vs.

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

Defendants.

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**PLAINTIFF’S VERIFIED RESPONSE TO THE COURT’S  
PAPERLESS ORDER DATED MAY 9, 2025**

Plaintiff, Tiffany (NJ) LLC (“Plaintiff”), by and through its undersigned counsel, hereby submits this verified response to the Court’s Paperless Order Regarding Procedures in Schedule “A” Causes of Action, dated May 9, 2025 [ECF No. 16]. In support thereof, Plaintiff states as follows:

1. On May 9, 2025, my firm conducted a search on the Public Access to Court Electronic Records (“PACER”) of case filings through the United States case index search, in compliance with the Court’s Paperless Order, and confirmed Plaintiff has not filed against the Defendants at issue in any other district.

2. Additionally, to further comply with the Court’s May 9, 2025 Paperless Order and the Court’s May 9, 2025 Sealed Order [ECF No. 17], Plaintiff has prepared a Renewed *Ex Parte* Application seeking temporary *ex parte* relief pursuant to L.R. 5.4(d) using the CM/ECF events specifically earmarked for *ex parte* filings, which requires, unless the Court directs otherwise, that *ex parte* filings be restricted from public view. The Renewed *Ex Parte* Application is being filed separately at ECF No. 19, contemporaneously herewith.

3. As noted in Plaintiff's Renewed *Ex Parte* Application, filed at ECF No. 19, Plaintiff has verified that this Court has personal jurisdiction over each Defendant. (See ECF No. 19-3 at ¶ 3.) Plaintiff's Complaint alleges the Court has personal jurisdiction over each Defendant, because each Defendant is a non-resident of the United States and has offered to sell counterfeit Tiffany branded goods to consumers in this district. (See Compl. ¶¶ 2, 7, 11, 28.) The Eleventh Circuit has held that Florida's long-arm statute permits jurisdiction over a nonresident defendant who commits a tort outside of the state that causes injury inside the state. Licciardello v. Lovelady, 544 F.3d 1280, 1283 (11th Cir. 2008). Further, the Eleventh Circuit has specifically stated that trademark claims under the Lanham Act allege tortious acts for long-arm purposes. Louis Vuitton Malletier, S.A. v. Mosseri, 736 F.3d 1339, 1353 (11th Cir. 2013).

4. Additionally, Plaintiff's Renewed *Ex Parte* Application sets forth the requisite elements and establishes entitlement to the relief with regard to each Defendant.

5. Moreover, because Plaintiff is filing its Renewed *Ex Parte* Application at ECF No. 19 without notice to Defendants, Plaintiff is attaching the Declaration of Stephen M. Gaffigan, Plaintiff's counsel, to its Renewed *Ex Parte* Application to certify why *ex parte* relief is warranted and the reasons as to why notice to Defendants in this matter should not be required. (See ECF No. 19-3 at ¶ 5.)

6. Accordingly, Plaintiff respectfully submits its Renewed *Ex Parte* Application at ECF No. 19, is being filed in compliance with the terms of the Court's May 9, 2025 Paperless Order.

DATED: May 14, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

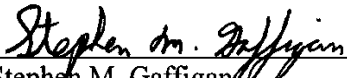
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Attorneys for Plaintiff, Tiffany (NJ) LLC

**VERIFICATION**

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed the 14th day of May 2025, at Ft. Lauderdale, Florida.

  
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Stephen M. Gaffigan