

**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.

PLAINTIFF'S NOTICE OF INABILITY TO COMPLY

Plaintiff Tiffany (NJ) LLC ("Plaintiff"), by and through its undersigned counsel, hereby gives notice of its inability to comply with certain provisions set forth in the Court's Sealed Order on Plaintiff's Renewed *Ex Parte* Application for Entry of Temporary Restraining Order and Order Restraining Transfer of Assets, dated August 20, 2025, ECF No. [22 *SEALED*], and states as follows:

1. On August 20, 2025, the Court entered a Sealed Order on Plaintiff's Renewed *Ex Parte* Application for Entry of Temporary Restraining Order and Order Restraining Transfer of Assets (the "Sealed Order"), dated August 20, 2025, ECF No. [22 *SEALED*].
2. The Sealed Order directs Plaintiff to file a notice advising the Court of the specific information outlined in Paragraphs 6-7 by "no later than five days prior to the preliminary injunction hearing set herein." (See Sealed Order, ECF No. [22] at pp. 11-13.)
3. As of the filing of this Notice, Plaintiff has not received the full response to the information requested from the financial entities at issue in this matter and therefore, is unable to comply in that regard.

4. Plaintiff respectfully submits that upon receipt of the requested information from the financial entities, Plaintiff will immediately provide the documents to the Court.

DATED: August 22, 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, Tiffany (NJ) LLC