

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 22-62000-CIV-RUIZ**

FEDERATION OF THE SWISS  
WATCH INDUSTRY FH, et al.,

Plaintiffs,

vs.

BESTINTIMES.ME, *et al.*

Defendants.

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

Plaintiffs, Federation of the Swiss Watch Industry FH, Audemars Piguet Holding SA, Breitling SA, Breitling U.S.A. Inc., Hublot SA, Genève, Omega SA, Patek Philippe SA Geneve, Henri Stern Watch Agency, Inc., Turlen Holding SA, and LVMH Swiss Manufactures SA (“Plaintiffs”), 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 Plaintiffs’ Request for Clerk’s Entry of Default (“Gaffigan Decl.”) ¶ 6, filed concurrently herewith.)

On November 8, 2022, Defendants were served with their respective Summons and a copy of the 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 Nos. 18-1, 18-2 and 18-3, Affidavits of Service on file with the Court.)

Time allowed for Defendants to respond to the Complaint has expired. (Id. at ¶ 4.) Neither Plaintiffs 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 Plaintiffs' attorneys of record. (Id. at ¶ 6.) Plaintiffs are informed and believe that Defendants are not infant or incompetent persons. (Id. at ¶ 7.) Plaintiffs are informed and believe that the Servicemembers Civil Relief Act does not apply. (Id.)

WHEREFORE, Plaintiffs, Federation of the Swiss Watch Industry FH, Audemars Piguet Holding SA, Breitling SA, Breitling U.S.A. Inc., Hublot SA, Genève, Omega SA, Patek Philippe SA Geneve, Henri Stern Watch Agency, Inc., Turlen Holding SA, and LVMH Swiss Manufactures SA, request that default be entered against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto.

DATED: December 1, 2022

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: /Stephen M. Gaffigan/

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Attorneys for Plaintiffs

**SCHEDULE "A"**

<b>Defendant Number</b>	<b>Defendant / Domain Name</b>
1	bestintimes.me
1	1-1clone.com
1	aaa-replica.com
1	amazingwatches.org
1	apwatch.net
1	apwatchchat.com
1	apwatches.net
1	bassreplica.com
1	bestapwatch.com
1	bestenuhren.net
1	bestenuhrens.com
1	bestintimes.com
1	bestreplica.org
1	cchopardtimes.com
1	ccluxury.org
1	chattimes.me
1	chopardforum.com
1	cinwatches.me
1	clocktowerss.com
1	cloneppwatch.com
1	cmblogwatch.net
1	cuwatch.com
1	dermowatch.org
1	detimer.net
1	dreampanerai.com
1	emyoku.com
1	fakewatchesswiss.com
1	falsiorologi.it
1	farleftwatch.org
1	finetimepieces.net
1	gradeclonewatch.com
1	gradeonewatch.com
1	hbuyings.me
1	hellointimes.com
1	hellopanerai.net
1	hellorolex.so
1	hellorolexwatch.com
1	hellorollie.com
1	highreplicasshop.com
1	hireplica.com

<b>Defendant Number</b>	<b>Defendant / Domain Name</b>
1	holapanerai.me
1	holatime.me
1	hotreplicas.net
1	innotizen.com
1	ireplicas.com
1	jfppwatch.com
1	jfreplicawatch.com
1	joinwatch.net
1	juliuswatch.info
1	king-watches.cn
1	kuvarsitshop.com
1	kuvarsitwatches.com
1	linkpops.net
1	lreplica.com
1	luxurypanerai.com
1	magicrolex.com
1	menwatchessell.com
1	mrepwatches.com
1	multiluxury.com
1	nurrawatches.com
1	ok-replica.net
1	okreplicaclock.com
1	okreplicawatch.com
1	okrepliquemontre.com
1	omegachat.me
1	omegaforsale.me
1	omegasweden.org
1	paybestwatch.net
1	paywatches.me
1	paywatches.net
1	perfake.me
1	perfect-clones.com
1	pfcmarek.me
1	popwatch.org
1	porwatch.com
1	ppfake.net
1	pureintime.net
1	puretime03.me
1	puretimes.me
1	puretimeswatch.com
1	replicachopard.com
1	replicaomegasale.com

<b>Defendant Number</b>	<b>Defendant / Domain Name</b>
1	replicatopwatches.com
1	replicauhrenat.com
1	replica-watch.net
1	replicawatchonline.com
1	repswatch.org
1	rmclone.com
1	rolexforreplica.com
1	rolexforsale.me
1	roowatch.com
1	skytime.biz
1	skytimepiece.com
1	skytimepiece.org
1	swisspanerai.com
1	swisswatchessales.com
1	swisswatchessite.com
1	tagsea.me
1	timepiecebuy.org
1	timereps.org
1	topgradewatch.com
1	toppuretime.com
1	topswissclock.com
1	topwatchesstore.com
1	topwatchshop.org
1	trustytime88.com
1	trustytimewatch.com
1	tswatches.me
1	tswatchesltd.com
1	tswatchshop.com
1	tttime.co
1	usjaeger.com
1	usreplicas.com
1	uswisssale.me
1	vreplicawatches.com
1	vshublot.com
1	watchesclocks.me
1	watchindiscount.com
1	watchpig.com
1	winreplicas.com
1	ywatch.org
1	zowatch.com
1	zowatch.me
2	affactorywatches.com

<b>Defendant Number</b>	<b>Defendant / Domain Name</b>
2	arfactory.com.cn
2	arwatches.org
2	bestreplicawatch.cn
2	bestswiss.net
2	bestwatchesrolex.com
2	breitlingreplicawatch.com
2	copypatekphilippe.com
2	copyrolexdaytona.com
2	discountwatches.cn
2	fakepatekwatches.com
2	fakewatchesrolex.com
2	menswatches.com.cn
2	newlongines.com
2	omegashop.net.cn
2	patek-philipe.com
2	repicalongines.net
2	repicapatekphilippe.com
2	replicawatch.ac.cn
2	replicawatchesmap.org
2	watchesoutlet.com.cn
3	omegafamily.co
4	allswisswatch.eu
4	allswisswatch.is
4	elitereplicawatch.eu
4	elitereplicawatch.is
4	replicahaus.ca
4	replicahause.com.au
4	replicahause.fr
4	replicahause.is
4	shopreplica.eu
4	thereplicahaus.es
5	betterbuywatches.com
5	betterbuywatches.me
5	e-luxurywatches.com
5	e-luxurywatches.me
5	replicamagic.is
5	replicamagicwatch.me
5	replicamagicwatch.to
5	suitewatches.com
5	swissexpert.me
5	swissexpert.net
5	swissreplicas.to

<b>Defendant Number</b>	<b>Defendant / Domain Name</b>
5	watchsourceguide.com
6	luxurywatchreplica.com
6	noobfactorywatch.com
6	noobreplicawatches.com
6	repicaluxurywatch.com
6	repिकासale.online
6	repिकासale.vip
6	repicawatchprice.com
6	swissclonewatch.com
6	swissluxuryreplica.com
6	swissreplicashop.com
6	swisswatches.vip
7	361watches.com
8	aaareplicawatch.co
8	aaa-replicawatch.co
9	affordablewatches.ru
10	annashop.com.ua
11	biao.sr
12	avenwatchesalike.co
13	bywatch.co
14	chasy-vip.by
15	chinanoobwatch.cx
15	repicachinawatch.cc
16	chinwatch.co
17	choosepopwatches.co
18	cheapestwrist.co
18	cheapestwrist.com
18	chrono4usale.co
18	chronosale.co
18	highluxurystore.co
19	classicwatchess.com
20	clonesuperwatch.io
20	clonesuperwatch.ru
21	cloudwatches.co
21	x-watch.co
21	x-watches.co
22	contests4moms.com
22	watchcopy.live
23	copwatchalike.co
23	copywatchalike.co
23	copywatchalike.is
24	dealerCLOCKS.shop

<b>Defendant Number</b>	<b>Defendant / Domain Name</b>
24	dealerclocks.to
25	deuhr.de
26	donghosieure.vn
27	eta-uhren.de
28	fakewatchesforsell.com
28	salefakewatches.com
29	frmontre.fr
29	replicareloj.co
29	rrwatch.co
29	watchfeed.co
30	frs.fo
31	hahabags.ru
31	ihahabags.ru
32	hontwatch.ru
33	intime05.co.uk
34	intime06.co
35	intimereplica.co
36	intimewatch.net
37	iwatchclone.co
38	jemontres.co
39	jtime.io
40	luxurypurse.cn
40	replicaswatches.co
40	ukwatches.cn
41	magazin1.replicano.org
42	minutka.by
43	montrerepique.co
44	montresdeluxe.co
45	mywatches.com.pk
45	replicawatches.pk
45	rshop.com.pk
46	noobwristwatch.net
47	onlinewatcha.com
48	orologiit.it
49	orologireplicablog.com
50	oscarfreirerelojoaria.com.br
51	otxwatches.net
52	perfectreplicawatch.to
52	perfectreplicawatches.to
53	pkwatchstore.com
54	pro-watch.co
54	relojline.co



<b>Defendant Number</b>	<b>Defendant / Domain Name</b>
54	watch-demo.cc
54	watchesgoing.co
55	relojesreplicas.es
55	relojessuizosdelujo.com
55	replicasrelojesbaratos.com
55	replikuhrenshop.de
56	replicamade.is
57	replica-relojes.es
57	replicas-relojs.es
58	replicashop1.com.ua
59	replicas-relojes.es
60	replica-uhren-shop.cc
61	replicawatchreport.co
61	replicawatchreports.co
62	rolexwanduhr.de
63	royalwatches.pk
64	skywalt.com
65	teatorivellino.it
66	thefakewatches.com
67	time-expert.com.ua
68	trb88.club
69	trustytimewatch88.io
70	vipwatches.eu
71	vogkopi.com
72	vollmer-replica.com
73	watchesi.co
73	watchi.co
74	watchesproduct.com
74	watcheswork.com
75	watchesyoga.io
76	watchhutuk.com
77	watch-paradise-1.ru
77	watch-paradise-1.su
78	wristclone.ru
79	yupoo.com.ru
79	yupoobrand.ru

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on December 1, 2022, 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 1<sup>st</sup> day of December 2022, 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/WoS5n1/index.html>.

s:/Stephen M. Gaffigan/

Stephen M. Gaffigan