

**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.

**DECLARATION OF STEPHEN M. GAFFIGAN IN SUPPORT OF
PLAINTIFFS' REQUEST FOR CLERK'S ENTRY OF DEFAULT**

I, Stephen M. Gaffigan, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for 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") in the above-captioned matter. I make this Declaration, which is filed in support of Plaintiffs' Request for Clerk's Entry of Default, and I could and would testify competently to the matters set forth herein.

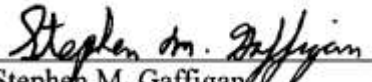
2. On October 27, 2022, Plaintiffs filed their Complaint against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" hereto (collectively, "Defendants"). (ECF No. 1.)

3. 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. (See ECF Nos. 18-1, 18-2 and 18-3, Affidavits of Service on file with the Court reflecting that Defendants were served.)

4. The time allowed for Defendants to respond to the Complaint has expired.
5. The Defendants have not been granted an extension of time to respond to the Complaint.
6. The Defendants have failed to answer or otherwise respond to the Complaint, or serve a copy of the Answer or other response upon Plaintiffs' attorneys of record.
7. I am informed and believe none of the Defendants are infants or incompetent persons, and, upon information and belief, the Servicemembers Civil Relief Act does not apply.

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

Executed on December 1, 2022, at Ft. Lauderdale, Florida.


Stephen M. Gaffigan

SCHEDULE "A"

Defendant Number	Defendant / Domain Name
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

Defendant Number	Defendant / Domain Name
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	luxurypaneraisale.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

Defendant Number	Defendant / Domain Name
1	replicaomegasale.com
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

Defendant Number	Defendant / Domain Name
1	zowatch.me
2	affactorywatches.com
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

Defendant Number	Defendant / Domain Name
5	swissexpert.me
5	swissexpert.net
5	swissreplicas.to
5	watchsourceguide.com
6	luxurywatchreplica.com
6	noobfactorywatch.com
6	noobreplicawatches.com
6	repicaluxurywatch.com
6	replicasale.online
6	replicasale.vip
6	replicawatchprice.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	replicachinawatch.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

Defendant Number	Defendant / Domain Name
23	copwatchalike.co
23	copywatchalike.co
23	copywatchalike.is
24	dealerclocks.shop
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	montrereplique.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

Defendant Number	Defendant / Domain Name
52	perfectreplicawatch.to
52	perfectreplicawatches.to
53	pkwatchstore.com
54	pro-watch.co
54	relojline.co
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	teatrorivellino.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

