

**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 VIRGILIO GIGANTE IN SUPPORT OF
PLAINTIFFS' MOTION TO ENFORCE JUDGMENT FOR A SPECIFIC ACT**

I, Virgilio Gigante, declare and state as follows:

1. I am an attorney duly authorized and licensed to practice law before all courts in the State of Florida and the Southern District of Florida. I am counsel of record 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 action. I submit this Declaration in support of Plaintiffs' Motion to Enforce Judgment for a Specific Act ("Motion to Enforce Judgment"). I am personally knowledgeable of the matters set forth in this Declaration and, if called upon to do so, I could and would competently testify to the following facts set forth below.

2. As of this date, certain Defendants, the Individuals, Partnerships, or Unincorporated Associations identified on Schedule "A" attached hereto (the "Noncomplying Defendants"), have failed to transfer their domain names identified on Schedule "A" hereto (the "Subject Domain

Names”),¹ to Plaintiffs as ordered by the Court. My firm reviewed the publicly available registration data for the Subject Domain Names. The registration data for each of the Subject Domain Names has not changed since the date the Court entered the Default Final Judgment and Permanent Injunction on December 27, 2022 [ECF No. 29]. True and correct printouts recently obtained by my firm outlining the domain name registration data for the Subject Domain Names are attached hereto as Composite Exhibit “1.”

3. Additionally, as of this date, the Noncomplying Defendants have failed to transfer all rights, title, and interest, to their Subject Domain Names to Plaintiffs, and, upon information and belief, have failed to instruct all search engines to permanently delist or deindex the Subject Domain Names, as ordered by the Court. On March 12, 2023, my firm visited the websites operating under the Subject Domain Names identified on Schedule “A” hereto and observed most of the websites displaying and offering for sale goods bearing counterfeits of Plaintiffs’ trademarks at issue.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 13 day of March, 2023, at Fort Lauderdale, Florida.



Virgilio Gigante

¹ Plaintiffs are limiting their request for relief to the specific Subject Domain Names identified on Schedule “A” hereto, as they have not been transferred to Plaintiffs as required by the Final Default Judgment and Permanent Injunction entered in this matter.

SCHEDULE “A”
NONCOMPLYING DEFENDANTS BY NUMBER AND SUBJECT DOMAIN NAME

Defendant Number	Defendant / Subject Domain Name
1	king-watches.cn
2	arfactory.com.cn
2	bestreplicawatch.cn
2	discountwatches.cn
2	menswatches.com.cn
2	omegashop.net.cn
2	replicawatch.ac.cn
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	replicamagic.is
5	replicamagicwatch.me
6	replicasale.vip
6	swisswatches.vip
8	aaareplicawatch.co
9	affordablewatches.ru
10	annashop.com.ua
11	biao.sr
12	avenwatchesalike.co
13	bywatch.co
14	chasy-vip.by
15	chinanoobwatch.cx
21	x-watches.co
23	copywatchalike.is
25	deuhr.de
26	donghosieure.vn
27	eta-uhren.de
29	watchfeed.co
30	frs.fo

31	hahabags.ru
31	ihahabags.ru
32	hontwatch.ru
34	intime06.co
35	intimereplica.co
37	iwatchclone.co
38	jemontres.co
39	jtime.io
40	luxurypurse.cn
40	replicaswatches.co
40	ukwatches.cn
42	minutka.by
45	mywatches.com.pk
45	replicawatches.pk
45	rshop.com.pk
48	orologiit.it
50	oscarfreirerelojoaria.com.br
55	relojesreplicas.es
55	replikuhrenshop.de
56	replicamade.is
57	replica-relojes.es
57	replicas-relojs.es
58	replicashop1.com.ua
59	replicas-relojes.es
62	rolexwanduhr.de
63	royalwatches.pk
65	teatrorivellino.it
67	time-expert.com.ua
70	vipwatches.eu
73	watchi.co
77	watch-paradise-1.ru
77	watch-paradise-1.su
78	wristclone.ru
79	yupoo.com.ru
79	yupoobrand.ru