

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 25-25088-CIV-MARTINEZ

GOYARD ST-HONORE,

Plaintiff,

vs.

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

Defendants. _____ /

PLAINTIFF'S VERIFIED RESPONSE TO THE COURT'S OMNIBUS ORDER

Plaintiff, Goyard St-Honore ("Plaintiff" or "Goyard"), by and through its undersigned counsel, hereby submits this verified response to the Court's Omnibus Order, dated November 11, 2025 [ECF No. 6]. In support thereof, Plaintiff states as follows:

1. In preparation for the filing of this matter, on October 23, 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 Omnibus 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 Omnibus Order, Plaintiff has prepared an *Ex Parte* Application seeking temporary *ex parte* relief and an *Ex Parte* Motion for alternate service under Federal Rule of Civil Procedure 4(f)(3) 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. These motions are being filed separately at ECF Nos. 8 and 9, contemporaneously herewith.

3. As noted in Plaintiff's *Ex Parte* Application, filed at ECF No. 8, Plaintiff has verified that this Court has personal jurisdiction over each Defendant. 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 Goyard-branded goods to consumers in this district. (Compl. ¶¶ 2, 7, 12, 29.) 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 *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 *Ex Parte* Application at ECF No. 8 without notice to Defendants, Plaintiff is attaching the Declaration of T. Raquel Wiborg-Rodriguez, who is Plaintiff's counsel, to its 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. 8-3 at ¶¶ 4-7.)

6. Plaintiff's *Ex Parte* Motion for alternate service under Federal Rule of Civil Procedure 4(f)(3), filed at ECF No. 9, encompasses the Court's requirements for such motions and attaches sworn declarations regarding each Defendant's purported domicile and the efforts Plaintiff has undertaken to verify any physical addresses. Plaintiff's *Ex Parte* Motion for alternate service further specifies the form of alternate service being requested and whether these forms are permitted by the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents as to each Defendant's purported domicile.

7. Separately, Plaintiff is also filing a Motion to Seal, ECF No. 7, using the CM/ECF events specifically earmarked for a motion to seal. Plaintiff's Motion to Seal requests the Court allow two documents to be filed under seal: (i) Schedule "A" to Plaintiff's Complaint; and (ii) Summonses as to Defendants. In compliance with L.R. 5.4(b), Plaintiff's Motion to Seal sets forth the factual and legal basis for departing from the policy that Court filings are public and describes the documents to be sealed without attaching or revealing the content of the proposed sealed material. To that end, Plaintiff's Complaint notes that Schedule "A" has been redacted pursuant to L.R. 5.4(b)(1) as that section is the subject of Plaintiff's Motion to File Under Seal. (See ECF No. 1 at p. 28.)

8. Accordingly, Plaintiff respectfully submits its motion filed at ECF No. 7, and its *Ex Parte* Motions filed at ECF Nos. 8 and 9 are being filed in compliance with the terms of the Court's Omnibus Order.

Dated: November 11, 2025.

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: **Annie O'Leary**

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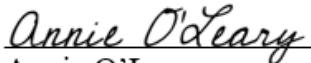
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Attorneys for Plaintiff, Goyard St-Honore

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 11th day of November 2025, at Hollywood, Florida.


Annie O'Leary