

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 20-62084-CIV-DIMITROULEAS**

WHIRLPOOL CORPORATION, *et al.*,

Plaintiffs,

vs.

AJAXFILTERS.COM, *et al.*,

Defendants.

REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiffs, Whirlpool Corporation, Whirlpool Properties, Inc., and Maytag Properties, LLC (“Plaintiffs”), by and through their undersigned counsel, hereby request that the Clerk enter default in this matter against Defendants¹, the Individuals, Partnerships and Unincorporated Associations as 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 October 30, 2020, Defendants were served with respective Summons and copies of the Complaint and Amended 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 No. 22-1 and 22-2, Affidavits of Service on file with the Court.)

¹ Plaintiffs are not seeking entry of default against Defendant Nos. 1 (ajaxfilters.com), 8 (Yeyehuang), 50 (quality-7135), 60 (Vodkas), 61 (loveyousea), 62 (Mini Town), 63 (tsxgqq), 64 (xianmeiyin34), 65 (yujian1989x) and 66 (zhouqing68).

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 infants or incompetent person. (Id. at ¶ 7.) Plaintiffs are informed and believe that the Servicemembers Civil Relief Act does not apply. (Id.)

WHEREFORE, Plaintiffs, Whirlpool Corporation, Whirlpool Properties, Inc., and Maytag Properties, LLC, request that default be entered against Defendants, the Individuals, Partnerships and Unincorporated Associations as identified on Schedule “A” hereto (collectively “Defendants”).

DATED: December 9, 2020

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

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Attorneys for Plaintiffs

SCHEDULE "A"

Defendant Number	Defendant /Domain Name / Seller ID
2	choccocino.com
3	femininemiss.com
4	Aikendrop Store
5	No.37 Art Factory Store
6	ICE PURE Flagship shop
7	New Moo
9	87_zcr7r
9	asawind19
10	catday
11	chjctop
11	waterprime_2
12	chstarfilter
12	junewater
12	waterfun65
13	cqfilter
14	dannas_52
15	dazmedi
16	diaoshi-0
17	distributor_canada
18	doly-5291
19	dshbtop
19	freshwatertop
20	dyed_18
21	emilia29po42
22	familypartsplus
23	ftbt21
24	funo-90
25	goodandreadya
25	youngsouls
26	goodwill2019
27	gre-5391
28	great-filter-solution
29	harveyk-53
30	healthywater98
31	huasharenmin2013
31	savecash4you_2014
31	taoyoumehgfd
31	time.ing
32	jackelidu0

Defendant Number	Defendant /Domain Name / Seller ID
33	jeandel-40
34	jtcv-15
35	juliscr-0
36	ken_9663
37	lisven_42
38	lygi2857
39	lzhlds2010_6
40	matthew25w-32
41	michaenas_2
41	briancr-5801
41	stanlegise_0
41	alexb_5_9
41	hoangha-3
41	andreww_9
41	gerts_97
41	leviat_98
42	mkait1
43	myrashop2
44	nau34ghty
45	nfub73
46	outpow
47	paronehtree
48	parrahshop
49	priestlyy
51	ravicin25
52	redfox-tech
53	schoen46
54	stustal69
55	tmic-78
56	veil3048
57	watereco
58	whis3persing5
59	yu-mrr

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 9, 2020, 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 9th day of December 2020, 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/xF41y/index.html>.

s:/Stephen M. Gaffigan/

Stephen M. Gaffigan