

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 20-62246-CIV-SINGHAL

THE NORTH FACE APPAREL CORP., *et al.*,

Plaintiffs,

vs.

AUTNFOUTLETSTORE.COM, *et al.*,

Defendants.

REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiffs, The North Face Apparel Corp., TBL Licensing LLC, Vans, Inc., Jansport Apparel Corp., Kipling Apparel Corp., and Altra LLC (“Plaintiffs”), by and through their undersigned counsel, hereby request that the Clerk enter default in this matter against Defendants, 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 November 13, 2020, Defendants were served with their respective Summons and 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 No. 13-1, 13-2 and 13-3, Affidavits of Service on file with the Court.)

Time allowed for Defendants to respond to the Complaint has expired. (Id. at ¶ 4.) Neither Plaintiff 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 Plaintiff’s attorneys of record. (Id. at ¶ 6.)

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

WHEREFORE, Plaintiffs, The North Face Apparel Corp., TBL Licensing LLC, Vans, Inc., Jansport Apparel Corp., Kipling Apparel Corp., and Altra LLC, hereby request that default be entered against Defendants, the Individuals, Partnerships and Unincorporated Associations as identified on Schedule “A” hereto.

DATED: December 10, 2020

Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: /Stephen M. Gaffigan/

Stephen M. Gaffigan (Fla. Bar No. 025844)

Virgilio Gigante (Fla. Bar No. 082635)

T. Raquel Wiborg-Rodriguez(Fla. Bar. No. 103372)

401 East Las Olas Blvd., Suite 130-453

Ft. Lauderdale, Florida 33301

Telephone: (954) 767-4819

E-mail: Stephen@smgpa.net

E-mail: Leo@smgpa.net

E-mail: Raquel@smgpa.net

Attorneys for Plaintiffs

SCHEDULE "A"

Defendant Number	Defendant / Domain Name
1	<i>Dismissed</i> (autnfoutletstore.com)
1	storetnfjacket.de
1	<i>Dismissed</i> (tnfjacketcheaps.co.uk)
1	tnfjacketsclearan.com
2	billignorthfacejakker.com
2	halpanorthface.com
2	levnenorthfaceonline.com
3	eleshcapoherbs.com
4	esinkaracan.com
4	nwflfirewood.com
4	twinklepopsicle.com
5	<i>Dismissed</i> (hararestar.com)
6	houseboundbunnylife.com
6	tastyrecipes123.com
7	indirimlinorthface.com
7	northfacech.com
7	northfacehelsinki.com
7	northfacehu.com
7	northfacenorge.com
7	northfaceonlinesale.com
7	northfaceoutletdanmark.com
7	northfacepl.com
7	northfaceportugal.net
7	northfacerea.com
7	northfacesg.com
7	northfacesingapore.com
7	northfacesverige.com
7	northfaceudsalg.com
7	northfacevypredaj.com
7	sklepnorthface.com
7	thenorthfacesaleaustralia.com
7	thenorthfaceturkiye.com
7	tnffiyat.com
7	tnfoutletcanada.com
7	tnfsalecanada.com
7	tnfsaleuk.co.uk
7	tnfsaleuk.com
8	limosroundrock.com
9	littlemonkeywrites.com
10	magasinnorthface.fr
10	northfaceberlin.de

Defendant Number	Defendant / Domain Name
10	northfaceeshop.cz
10	northfaceindia.co.in
10	northfaceindia.in
10	northfaceita.it
10	thenorthfaceaustralia.com
10	<i>Dismissed</i> (thenorthfaceoutlet.es)
10	thenorthfaceromania.ro
10	thenorthfacesuomi.fi
10	tnfmexico.com.mx
10	tnfoutlet.es
10	tnfoutletsingapore.com
11	mariyus.ca
12	north-face.ca
13	northface-jacket.ca
13	<i>Dismissed</i> (northfaceoutletstore.com)
14	northfacemensale.com
15	northfaceuitverkoop.com
16	norththeface.cc
17	polomonline.xyz
18	robitaille-energie.com
19	seanema.me
20	thenorthfacesale.site
21	tourntravelmart.com
22	<i>Dismissed</i> (cheaptimberlboot.co.uk)
23	darganlong.com
24	dlglandmanagement.com
25	donniecalabro.com
26	mimatangoma.com
27	timberland1973.xyz
28	timberlandbootonsale.co.uk
29	timberlandbotfiyat.com
30	biotesisat.com
30	cbta.fr
30	sneakers2019.de
30	storepuma365.xyz
30	zapatillasvans.xyz
31	newvansoldskool.com
31	vansslip-on.com
32	newvansshoes.co.in
32	vansfrsolde.fr
32	vansit.it
32	vansmagazin.com
32	<i>Dismissed</i> (vansnzsale.co.nz)

Defendant Number	Defendant / Domain Name
32	vansprahacz.cz
32	vanssale-au.com
32	vansshopbudapest.com
32	<i>Dismissed</i> (vansstore.co.in)
32	vansstoreschweiz.com
33	ospbronowice.pl
34	sirajjewellery.com
35	studyincn.ca
36	troiashoes.com.br
37	vansavepro.com
38	vansayakkabis.com
39	vansbrand.ru
40	<i>Dismissed</i> (vanscanada.ca)
41	vanscarpe.it
42	vansclearancesale.com
43	vansoldskool.us
44	vansoldskoolschuhe.de
45	vansoutlet.net
46	vansoutletonline.es
47	vans-sale.ru
48	vansskosalg.cz
49	vanssoldes.fr
50	vansstyle73.com
51	westwindcdl.com
52	<i>Dismissed</i> (zapatosedelona.es)
53	<i>Dismissed</i> (agritechadvisory.com)
53	pueblopreservation.com
54	ailleurscestici.fr
54	ain-bureau-class.com
54	apoteketsverige.eu
54	berkleydays.com
54	bertasalinas.es
54	bookincarrental.com
54	britzer-philatelistenclub.de
54	cakesbyfiona.co.uk
54	<i>Dismissed</i> (classiccanvas218.com)
54	csg-scouts.org.uk
54	donaldedmonds.com
54	fhslacrosse.com
54	flcattle.com
54	furnaceaircond.com
54	ganddfree.co.uk
54	homelingua.es

Defendant Number	Defendant / Domain Name
54	hybrisnegocioy talento.es
54	josephthomasflowershop.com
54	klangmassage-hanau.de
54	lafabricadejuan.com
54	petrikat-usedom.de
54	runrig-berlin.de
54	sequelstowlake.com
54	tutankhamencode.com
54	ukmbiznet.com
54	vrfklimalar.com
54	woodcraftsplusllc.com
55	<i>Dismissed</i> (arays-hair.com)
55	visionsofthecosmos.co.uk
56	attictreasureswhg.com
57	eprinterdriver.net
57	knowhowconsulting.co.uk
57	landmarkqualityhomeskansas.com
57	lavalloedugout.com
57	scottishbagpiper.co.uk
57	shaftesburyheritage.org.uk
57	total-lookup.com
57	urswickchurch.co.uk
58	espace-optimum.com
58	<i>Dismissed</i> (hartanahmega.com)
58	thekuriouskerri.com
59	grahamnordicocean.com
60	green-screen-people.com
60	michellesosnowski.com
61	higherlovestudios.com
62	myworldinsquares.com
63	<i>Dismissed</i> (onlinetruckada.com)
63	sarahringer.com
64	thomasandmonica.com
65	wp-bp.com
66	acessoriosdgriffe.com.br
67	arredamentistazi.it
67	kiplingsale.com
67	messages-on-hold.com
67	obiwansail.it
67	<i>Dismissed</i> (thebigeggccleveland.com)
67	tulipclassifieds.com
68	altra-ca.com
68	altraaustralia.com

Defendant Number	Defendant / Domain Name
68	altrashoescanada.com
68	altrashoesnz.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 10, 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 10th 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/vcfm3blu/index.html>.

s:/Stephen M. Gaffigan/

Stephen M. Gaffigan