UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO. 21-60088-CIV-RUIZ/STRAUSS

| ROGER CLEVELAND GOLF |
|-----------------------|
| COMPANY, INC, et al., |

Plaintiffs,

vs.

ALEXGOLF, et al.,

Defendants.

REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiffs, Roger Cleveland Golf Company, Inc., Sumitomo Rubber Industries, Ltd., Acushnet Company, Karsten Manufacturing Corporation, and Taylor Made Golf Company, Inc. ("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 February 19, 2021, Defendants were served with their respective Summons and copies of the Complaint and Amended Complaint via electronic mail ("e-mail") and via website

¹ Plaintiffs are not seeking entry of default against Defendant Nos. 3 (ancuipaining), 25 (dfhjcjh), 26 (diaoliwei3153), 35 (GHCJHSTRYf), 40 (HJGDUTYREAW), 83 (xiuzhonglifang) and 97 (fightgolf66) at this time.

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.)

Time allowed for Defendants to respond to the Complaint has expired. (<u>Id.</u> at ¶ 4.) Neither Plaintiffs nor the Court has granted the Defendants an extension of time to respond to the Complaint. (<u>Id.</u> 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. (<u>Id.</u> at ¶ 6.) Plaintiffs are informed and believe that none of the Defendants are infants or incompetent persons. (<u>Id.</u> at ¶ 7.) Plaintiffs are informed and believe that the Servicemembers Civil Relief Act does not apply. (<u>Id.</u>)

WHEREFORE, Plaintiffs Roger Cleveland Golf Company, Inc., Sumitomo Rubber Industries, Ltd., Acushnet Company, Karsten Manufacturing Corporation, and Taylor Made Golf Company, Inc., request that default be entered against Defendants, the Individuals, Partnerships and Unincorporated Associations as identified on Schedule "A" hereto.

DATED: March 15, 2021 Respectfully submitted,

STEPHEN M. GAFFIGAN, P.A.

By: /Stephen M. Gaffigan/

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

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Attorneys for Plaintiffs

SCHEDULE "A"

| Defendant Number | Defendant / Seller ID / Domain Name |
|---------------------|-------------------------------------|
| 1 | Alexgolf |
| 2 | abe0007 |
| 4 | arli222 |
| 5 | baoxu532 |
| 6 | Bella Moda Lopez |
| 7 | bhidzrea |
| 8 | Bill Grahamg |
| 9 | blurrytingling |
| 10 | Cansinyin Baby's |
| 11 | Carlos perez |
| 12 | Carmpundy Bedding |
| 13 | chenlin Store me |
| 14 | chungalexa |
| 15 | Cidshiti Shirt |
| 16 | conniefw33 |
| 17 | Coshan |
| 18 | cvfj17shop |
| 19 | cvhetraweERWA |
| 20 | DaomeishunkaneV |
| 21 | DAyisiki |
| 22 | ddureirufj |
| 23 | Delilan baby wow |
| 24 | dfgtry |
| 27 | djgtewreare |
| 28 | djseryisuysui |
| 29 | DKAAH |
| 30 | dongjingjingoj |
| 31 | fanshihuoshui |
| 32 | fubaojun Store |
| 33 | Fundown Bibs |
| 34 | gdfgegaefg |
| 36 | ghustwerW |
| 37 | Golf store2019 |
| 38 | hance213 |
| 39 | hanfgtf |
| 41 | hlkdh5852 |
| 42 | hoang222 |
| 43 | honghuoshop |
| 44 | huynhn532 |

| Defendant Number | Defendant / Seller ID / Domain Name |
|---------------------|-------------------------------------|
| 45 | JenettaBattlea |
| 46 | JN001003102 |
| 47 | jonanthonykisimkarll |
| 48 | KAVAC |
| 49 | kou8289shop |
| 50 | KwakyeJohn |
| 51 | Lina Sports |
| 52 | lipanpanyfgjuh |
| 53 | lishishuifen |
| 54 | lufenglin |
| 55 | lumenglong5960 |
| 56 | LusihaoquebWq |
| 57 | marcesoteldo |
| 58 | melania |
| 59 | Mrswang clothshopi |
| 60 | nfgerjyew |
| 61 | nu56ls45 |
| 62 | qipingping |
| 63 | reeman222 |
| 64 | reyes.zemlak |
| 65 | Roselee Retail Shop |
| 66 | Sarengaowa |
| 67 | Sevensisy socks |
| 68 | shimingxia5041 |
| 69 | Super BW |
| 70 | tanxiao Store |
| 71 | tingtingyulishop |
| 72 | Vasenkeiy Pants |
| 73 | VBHETRe |
| 74 | wanglixin5778 |
| 75 | wangshi1 |
| 76 | WANGsp |
| 77 | Wil894 |
| 78 | wuyatingshop |
| 79 | wyhgolf |
| 80 | xiaolingshop |
| 81 | xiaoshuijuanran |
| 82 | xinxinwangshop |
| 84 | Yangshuitao6563 |
| 85 | yanyyershop |
| 86 | youaccess |

| Defendant Number | Defendant / Seller ID / Domain Name |
|---------------------|-------------------------------------|
| 87 | ZhengrenloupNc |
| 88 | ZSZgolf |
| 89 | Amazestore |
| 89 | Dyson |
| 89 | Dyson Pro |
| 90 | Babyonline |
| 91 | Christmas02 |
| 92 | cindyoutdoor68 |
| 93 | cwmsports |
| 94 | Dearbeuty |
| 95 | dherar65 |
| 96 | Doomi |
| 98 | fitnesssports |
| 99 | Gaiman |
| 100 | Gemgolf |
| 101 | Jinjingolf10 |
| 102 | Kaixindian |
| 103 | Keshangolf |
| 104 | letsports |
| 105 | lichengolf55 |
| 106 | Ling113113 |
| 107 | Masker111 |
| 108 | Mius |
| 109 | Niu9988 |
| 110 | Openfire001 |
| 111 | piston_ring_grip88 |
| 111 | Golfstroke66 |
| 112 | progolf68 |
| 113 | Qiusun11 |
| 114 | Ryhefch36 |
| 115 | Shi289707636 |
| 116 | Sugolf888 |
| 117 | Sundi1818 |
| 118 | sunshinegolf214 |
| 119 | Tanggolf |
| 120 | Tianshanxuelian15 |
| 121 | Turbo168 |
| 122 | Turbo16888 |
| 123 | Vechat |
| 124 | Windercatcher |
| 125 | Winsdo |

| Defendant | |
|-----------|-------------------------------------|
| Number | Defendant / Seller ID / Domain Name |
| 126 | yanhu216226 |
| 127 | JOYstar Golfsports Factory Store |
| 128 | LISMGOLF Store |
| 129 | BirdieMaKe Golfing Store |
| 129 | BIRDIEMaKe GolfSports Store |
| 129 | Shop5584052 Store |
| 130 | chuangxindian Store |
| 131 | Franks Store |
| 132 | Golf-market Store |
| 133 | Gooday GolfSports Store |
| 134 | Grip market Store |
| 135 | Profession sport-s Store |
| 136 | Profession sports-accessories Store |
| 137 | Professional-sport Store |
| 138 | Shop3975022 Store |
| 139 | Shop5400015 Store |
| 140 | Shop5793282 Store |
| 141 | Shop5952138 Store |
| 142 | Shop910320060 Store |
| 143 | Shop910450248 Store |
| 144 | TOPRATED GolfSports Store |
| 145 | GolfGrips Store |
| 146 | Fitnesssports Store |
| 147 | adfa_30 |
| 148 | kraston |
| 149 | pamungkag0 |
| 150 | xiaoyinzi2013 |
| 151 | abcgrips.com |

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 15, 2021, 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 15th day of March 2021, 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/Dp24a15/index.html.

s:/*Stephen M. Gaffigan/*Stephen M. Gaffigan

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