UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF FLORIDA CASE NO. 21-60171-CIV-SINGHAL

TIFFANY (NJ) LLC,

Plaintiff,

vs.

GBV JEWELLERY STORE, et al.,

Defendants.

REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiff, Tiffany (NJ), LLC ("Plaintiff"), by and through its 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 Plaintiff's Request for Clerk's Entry of Default ("Gaffigan Decl.") ¶ 6, filed concurrently herewith.)

On February 9, 2021, Defendants were served with their 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. 25-1 and 25-2, Affidavits of Service on file with the Court.)

Time allowed for Defendants to respond to the Complaint has expired. (<u>Id.</u> at \P 4.) Neither Plaintiff nor the Court has granted the Defendants an extension of time to respond to the Complaint. (<u>Id.</u> at \P 5.) Defendants have failed to answer or otherwise respond to the Complaint,

¹ Plaintiff is not seeking entry of default against Defendant Nos. 35 (fashionproduct.inc) and 36 (huangyuen168).

or serve a copy of any Answer or other response upon Plaintiff's attorneys of record. (Id. at \P 6.) Plaintiff is informed and believes that none of the Defendants could be considered infants or incompetent persons. (Id. at \P 7.) Plaintiff is informed and believes that the Servicemembers Civil Relief Act does not apply. (Id.)

WHEREFORE, Plaintiff, Tiffany (NJ), LLC, requests that default be entered against Defendants, the Individuals, Partnerships and Unincorporated Associations as identified on Schedule "A" hereto.

DATED: March 8, 2021

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 Plaintiff

Defendant Number	Defendant /Seller ID / Domain Name
1	GBV Jewellery Store
2	HC S925 Store
3	Shop5791204 Store
3	Shop910562358 Store
3	315367596
4	Shop910339371 Store
5	Shop910456195 Store
6	tifff 925 Store
7	gloriousru
8	tyhc1349
9	designer02
10	Dh_shopping03
11	dior_01
12	funcheapdh
13	goodsale0316
14	heathere
15	jewelryinyoga
16	okaymissyou
17	pulchritudinous
18	sunshinesy
19	uwantbuy
20	villy4466
21	xiami2989
22	Xingya1
23	Xingya3
24	xingya4
25	Xingya6
26	xingya10
27	Zaixianwenhua
28	zhaobo01
	zhuoya_jewelry01
29	aka
	jewelry1238
30	Zty002
31	zhenbao85621731
31	lady_bags2017
32	_pandora_jewellery_925 aka
22	Jewelery/Silver/Clock
33	bagonlineshop1998

SCHEDULE "A"

	-1
	aka
24	bagshop
34	deluxe88shop
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37	
	Lelê Jóias
38	lucky-diamond.ru
38	lucky.diamond
39	olhagringaa
	aka
	Olha a Gringa
40	shewearsit.ldn
41	xdy978
	aka
	Crazy discounts
41	xdy111111
	aka
	Jewelry_bags_luxury
41	xdy333333
	aka
	Jewelry collection
41	xdy44444
	aka
	Luxury maker
42	xxianglee2019
	aka
	BlinkGirl
43	zag.su
44	zjenny621
	aka
	Jenny_Finestep
44	brandoutlets2020
	aka
	julieoutlets
	jewerlymx2020
45	aka
	Lana
46	jordan4.fr
47	ladys_accessories_
48	luxury_luxuryshop
49	luxwomen_moll
50	northern_moscow
51	shoponline152020
52	sneaker86
	aka

	CN_Supplier
	aka
	luxury_brand_cn
	aka
	Luxury_ brand
	topqualityreplichetop
53	aka
	Luxury bag Top quality
54	amberkhalidbestbuy
55	aygareshop
56	granllluviashop
57	HaDahl
58	lnowhew
59	marcianosflow
60	STAFFORD36
61	mcnorovyab
62	sandathotrtthl
63	sheetesrxbd
64	shilong7579
65	sleighshmedcv
66	wangbaojiang

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 8, 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 8th 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/TFm3NL/index.html.

<u>s:/Stephen M. Gaffigan/</u> Stephen M. Gaffigan