

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA  
CASE NO. 21-61332-CIV-RUIZ**

CHANEL, INC.,

Plaintiff,

vs.

ANALUXURYFASHION, *et al.*,

Defendants.

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**DECLARATION OF STEPHEN M. GAFFIGAN IN SUPPORT OF  
PLAINTIFF’S REQUEST FOR CLERK’S ENTRY OF DEFAULT**

I, Stephen M. Gaffigan, declare and say:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff, Chanel, Inc. (“Plaintiff”) in the above-captioned matter. I make this Declaration in support of Plaintiff’s Request for Clerk’s Entry of Default, and I could and would testify competently to the matters set forth herein.


2. On June 28, 2021, Plaintiff filed its Complaint. (ECF No. 1) Plaintiff subsequently filed its Amended Complaint on July 26, 2021 (ECF No. 16) against Defendants, the Individuals, Partnerships and Unincorporated Associations identified on Schedule “A” hereto (collectively, “Defendants”).

3. On July 27, 2021 and July 29, 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. (See ECF No. 31-1, 31-2 and 31-3, Affidavits of Service on file with the Court reflecting that Defendants were served.)

4. The time allowed for Defendants to respond to the Complaint has expired.
5. The Defendants have not been granted additional time to respond to the Complaint.
6. The Defendants has failed to answer or otherwise respond to the Complaint, or serve a copy of the Answer or other response upon Plaintiff's attorneys of record.
7. I am informed and believe none of the Defendants are infants or incompetent persons, and, upon information and belief, the Servicemembers Civil Relief Act does not apply.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 9, 2021, at Ft. Lauderdale, Florida.

  
Stephen M. Gaffigan

**SCHEDULE "A"**

<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
1	analuxuryfashion
2	bolsos_l.v_chanel
3	chanel.dio.lv.gucci
4	chenhuaying8
6	eva.brand.goods
8	hushbega
9	kelly_shoes1
10	lina9869832
10	yisa09889
11	love_brand_collection
12	luxury.storeglobal
13	luxuryshoesbags86
14	meizi_2013168_g
15	merrykick
17	nancyhenrybbb2020
18	worlds_brand_store76
20	yiyanbags
21	yofashionvip
22	brenda84819 aka Shop900250100 Store
23	hankyang0117 aka Shop911259040 Store
24	2589 Store
25	A-kuei
26	521bags.com
27	areaglam.com
28	blessedbedding.com
29	bolsoslvchanel.com
30	depurses.ru aka purse_inspiration
31	dtcbags.com
32	extrain.com
33	lemaisonparis.com
34	luxurybag.xyz
35	luxurybagweb.com
36	offstreetunit.com
37	todadivaofficial.com
38	wereplica.com
39	womyshop.com
44	aililady.com

<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
44	alicemini.com
46	lifefashionday.com
47	luxekings.co
49	thebrandroom.shop
50	Aricot
51	BRUZY&
51	HGVVV&
52	cduybbiuviu
53	fwqvk8888
54	GuangZhouLianJianShiYeYouXianGongSi
55	huajiazhiyuexianhuahunqingliyidian
56	taiyuanxiguaniaoyukejiyouxiangongsi
57	Yihao gift
58	aeXai6q
59	Angelicotory
60	BelleElai
61	Bluetronicsti
62	Brandi B. Makeup Artistry
63	DiVOT
64	DominicPh
65	fanghaijuan2312
66	farzonba
67	Formirt
68	Fragata Stores
69	Freelance Wardrobe Stylist
70	From Mercury
71	fus2174shop
72	gyasjbuaifg
73	h3t0jx
74	HaroldMon
75	HobartKer
76	hourace
77	hristopherBert
78	Hundp
79	James G Hope
80	Janice R Jackson
81	Jimmie M Skinner
82	JldeEas
83	Jolyom
84	JoNatividad
85	ju5k45

<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
86	Kate.Se
87	KevinAlvab
88	LIHANSHANGMAOSS
89	liuzhigang7230
90	loiSaif5
91	Mefranje1
92	missluxury
93	nds jagvdilsfjkdnxbhfgxngtngf
94	nice555
95	oaKie1te
96	Peggy McMullene
97	Popular color coordinates
98	sa6zi8E
99	Semca Tienda Online
100	Sherri M Rangel
101	Spideradioxy
102	stesoft
103	Sunyanli66085
104	Tasselti
105	tinkeauo
106	Toy Flower
107	Unipay
108	vcba
109	wanghai9181
110	wangting2650
111	watsubo
112	yufengx
113	AKA-shi
114	AngelaZebulonx aka amy0515
115	Annestephanie
116	apowejiufa
117	bambunatural
118	Beautiful metamorphosis
119	Beebaer Shoes
120	BetsyBridgetzPcPpV
121	Blue Princess
122	caiyohj5Sha
123	Cantsed
124	Cbarmen
125	cbvbyg

<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
126	CGuttma
127	Chenyijia Store
128	chgfte
129	cjeihf
130	Claudia Tour
131	Colorine
132	Complete Tech
133	David D Kettler
134	dazhanhongtu123
135	Drunk Labrador
136	etplaza
137	FarEast STAR
138	Felicitas A Coleman
139	fhuitjo
140	fjdwoagerhftgjthtrgfdxhtrf
141	fushuaikang3889
142	getgreenfast
143	goutoug2865
144	guillermoglover
145	Heckoshoo79mW3
146	hiovjhadkzfjhfgjngghjgyhjk
147	HiramAnnAnTfM
148	huchao1256
149	HugoPhoebesH
150	huirushangmaoss
151	huzhoudamaige
152	IvyPetenZn
153	ksoenfuyu
154	LatonyaToler
155	ldlrcyxnm
156	Lgsasasuasbs
157	liptim
158	llmortgage
159	loeirhwore
160	lqqkj dakfassg
161	manhdungtruong54101
162	McShaleCVpeq
163	Meat Jerky World
164	MengjiejingiXs
165	Natural companion
166	PacificCoastHans

<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
167	paiqiugongjin
168	Qdnjk
169	qingfang123
170	Rogers Food Stores
171	Ruchey
172	sdnjgheoirjtgfykgedgvsdfdw
173	SESAY2020
174	SIHUABAO1077
175	Small waist
176	smartlibrary
177	sqinzia
178	teJS
179	tiansjkea
180	TobeyUriahkBhOh
181	Ultreos
182	Used cars
183	ValentineBobaPcH
184	wangyujia0951
185	Witard
186	zhanghao2416
187	zhangliu1395
188	zhangtianqi Store
189	zuoze
190	Americanclothex
191	Bebidasrapidas
192	Betancourtcovalent
193	Bryan D Reynolds
194	ByronChloeaCeBl
195	ChicRepublique
196	DerrickGeorgiaqYkW
197	Don miguelon
198	DorisHuntertLqL
199	ErnestFaithevMpY
200	FARNCES
201	fifth area
202	FlowKrosty
203	G&O Supreme sparkle
204	GarlLe
205	gyhlaskdjaisf
206	Helen J Vargas
207	HenryZararZlS

<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
208	holywritings
209	hsfjkasfbhsjdhfjsef
210	ingarg86hba5lr
211	Inversiones Gus
212	Jason C Sandin
213	jergraph
214	John P Rooks
215	Kirsten M Manrique
216	La estancia ve
217	Lawrence A Johnson
218	Luis sports
219	majinxian
220	Marcel fast
221	Mario K Espinosa
222	Michelle K Crouch
223	miir91gang
224	mozhihao
225	Parzer
226	Patricia L Krick
227	Picinas y disfrutes
228	Prishould
229	QuintinaSandyuQeN
230	Revel Windmill
231	RobinJimmy
232	RoyBaldwinrNhU
233	shfdjafghsfjfhws
234	shfjkwhwkfwjhfwf
235	Skilled
236	sofasieure
237	songdan4772
238	StateLink
239	StevenPeters
240	Tecnox inc
241	The Last Pacers
242	Ussiossop
243	Wiffistandes
244	WSNBB world
245	wuzhichao0201
246	Yethat
247	yinweiyu
248	a2019



<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
250	az2026
251	bag0111
253	bestoffershop
254	bigbrand001
256	brandfactory333
258	buycheapcocos
259	chaneldior
261	danny_luxury_bag
262	Designer & hangbags aka dh_bag_jkshfk
263	duzhiy
266	focusonjersey
270	handbags618
271	hlwygood
273	jiuyiyi
274	jsm_shoes
275	Kanyeshoes350_014
276	king01234
277	kingremit02
278	ladybag100
279	laoyuan2
280	luxury_shops
281	luxurybags80
282	luxuryjewelryworld1
283	luxurysbag766
284	lvvl_bag
286	mrlizheng
288	paike2025
289	paikekeji
290	pangzi888
291	pumashop
292	qbfashionbag
293	red bottoms heel aka factory_store01
294	rose_king
295	rose28
296	rose288
298	senior441
299	shi9527
300	sneakersstore202009
302	stylishhandbagsstore

<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
303	sup_bags2020
305	tangtang2
306	therenobag
308	topshoes7836
311	xiao985985
313	xujin01
315	aceoutside
316	bingo44
317	Boutique package aka shang2021
318	bugbags
319	ceessd
324	fashion08008
325	hotlinechina
329	ladysbag999
330	leochan16
334	lvxuryshop
336	peng_350_v2
342	shenztop
343	shishangbag698
346	tianchennet
348	viviboutique
349	xiangdingdang