

**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, 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 10, 2021, at Ft. Lauderdale, Florida.

  
Stephen M. Gaffigan

**SCHEDULE "A"**

<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
249	aa1010612317
252	bag613
255	brand_bags666
257	buqu
260	chayuan99
264	factory8_store
265	fashionbags and jackets aka unin188
267	gongjia
268	Guangzhou Fashion T-Bear Co.,Ltd aka tradingbear
269	gzluxurybag
272	jiayu22
285	more than bags aka goodbest_8686
287	newbag999
297	runxiao
301	sport0004 crossbody Brand luxury bag aka sport0004
304	supermail_1
307	top_bag_6868
309	urmoby
310	vivishoescity aka Jessie_luxury4
312	xuanshu33
314	yiyu22
320	cicibags
321	designer_shoes668
322	designercasualshoes
323	EFFINI
326	John shoes and bags factory aka promotionking
327	joo8277
328	jooobag
331	luxurybags06
332	Luxuryhanbags aka dennis_suppliers
333	luxurys_shoes989
335	myshoescity
337	pingping6

<b>Defendant Number</b>	<b>Defendant / Seller ID / Domain Name</b>
338	pinksugao
339	poiruyiw
340	sgyj
341	shenian
344	shoesfinder
345	shoessupplier2021
347	topdesignersneaker