

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

CHANEL, INC.,

Plaintiff,

vs.

ANALUXURYFASHION, *et al.*,

Defendants.

/
REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiff, Chanel, Inc. ("Plaintiff"), by and through its 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")¹ 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 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. (Gaffigan Decl. ¶ 3; see ECF No. 32-1, 31-2 and 31-3, 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,

¹ Plaintiff is not seeking entry of default against Defendants identified on Schedule "B" hereto.

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

WHEREFORE, Plaintiff, Chanel, Inc., requests that default be entered against Defendants, the Individuals, Partnerships and Unincorporated Associations as identified on Schedule "A" hereto.

DATED: September 10, 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

SCHEDULE "A"

Defendant Number	Defendant / Seller ID / Domain Name
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

Defendant Number	Defendant / Seller ID / Domain Name
337	pingping6
338	pinksugao
339	poiruyiw
340	sgyj
341	shenian
344	shoesfinder
345	shoessupplier2021
347	topdesignersneaker

SCHEDULE "B"

Defendant Number	Defendant / Seller ID / Domain Name
5	cuiyeye2
7	furshoes_wholesale
16	moengyunxun
16	yifeichong36241
19	yaojiany
40	corwin.store
40	bluerd.shop
40	buebu.shop
40	feieagle.shop
40	iluivo.shop
40	incco.shop
40	ofore.store
40	seerlin.shop
40	wendco.shop
40	bluediem.shop
40	furta.shop
40	guuliy.shop
40	inscon.shop
40	potark.shop
40	ronio.shop
40	soloic.shop
40	viennais.shop
40	wesroles.shop
41	raretall.com
41	delightfuts.com
41	factiones.com
41	ignoreds.com
41	ongoinges.com
41	pendingets.com
41	beliefal.com
41	amountes.com
41	gloriousion.com
41	dawnise.com
41	shineian.com
41	yeaing.com
41	burlyts.com
41	seriouses.com
41	welcomeal.com
41	glowingss.com

Defendant Number	Defendant / Seller ID / Domain Name
42	jiyuanm.com
42	esunnily.com
42	tousikey.com
43	vrjewelry.com
43	vlcase.com
45	genilicaa.com
48	spitfice.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on September 10, 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 10th day of September 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/cp05e/index.html>.

s:/Stephen M. Gaffigan/

Stephen M. Gaffigan