

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

CHANEL, INC.,

Plaintiff,

vs.

ANALUXURYFASHION, *et al.*,

Defendants.

**DECLARATION OF STEPHEN M. GAFFIGAN
IN SUPPORT OF JUDGMENT CREDITOR'S MOTION FOR ORDER
AUTHORIZING JUDGMENT CREDITOR TO INITIATE DISCOVERY IN
AID OF EXECUTION OF JUDGMENT**

I, Stephen M. Gaffigan, declare and state as follows:

1. I am counsel of record for Judgment Creditor, Chanel, Inc. ("Judgment Creditor" or "Chanel"), in the above captioned action. I submit this Declaration in support of Judgment Creditor's Motion for Order Authorizing Judgment Creditor to Initiate Discovery. I am personally knowledgeable of the matters set forth in this Declaration and, if called upon to do so, I could and would competently testify to the following facts set forth below.

2. On June 29, 2021, Judgment Creditor filed its *Ex Parte* Motion for Order Authorizing Alternate Service of Process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) ("Motion for Alternate Service of Process"), [ECF No. 7]. On July 2, 2021, the Court entered an Order granting Judgment Creditor's Motion for Alternate Service of Process, [ECF No. 10], authorizing Judgment Creditor to serve the Summonses, Complaint, and all filings in this matter upon Judgment Debtors via electronic mail ("e-mail") or via website posting by posting copies of the same on Judgment Creditor's designated serving notice website appearing at the URL <http://servingnotice.com/cp05e/index.html>.

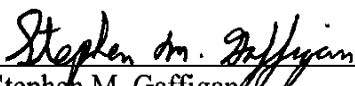
3. On July 27, 2021 and July 29, 2021, pursuant to the Court's Order authorizing alternate service, Judgment Creditor served Judgment Debtors with their respective Summons and a copy of the Complaint and Amended Complaint via e-mail and via Judgment Creditor's designated serving notice website. (See Affidavits of Service on file with the Court, [ECF No. 31].)

4. Judgment Debtors failed to answer or otherwise respond to the Amended Complaint or serve a copy of any Answer or other response in a timely manner and on September 10, 2021, and on September 13, 2021, respectively, the Clerk entered Default against the Judgment Debtors, [ECF Nos. 33, 35].

5. To date, Judgment Creditor has not recovered funds in full satisfaction of its Statutory Damages Award.

6. Judgment Creditor seeks to issue subpoenas and possibly depose third parties including PayPal, Inc., and PayPal (Europe) S.à r.l. et Cie, S.C.A.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 21st day of December, 2023, at Hollywood, Florida.


Stephen M. Gaffigan