

**UNITED STATES DISTRICT COURT**  
**SOUTHERN DISTRICT OF NEW YORK**

OMEGA SA,

Plaintiff,

v.

XIE ZHENMIN, *et al.*,

Defendants.

Civil Action No.: 12-cv-9338 (SAS)

**REQUEST FOR ENTRY OF DEFAULT**

TO: RUBY J. KRAJICK, CLERK OF COURT  
UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Plaintiff, Omega SA respectfully requests entry of default, pursuant to Fed. R. Civ. P. 55(a), against all Defendants in this lawsuit for their failure to appear or otherwise respond to the Complaint within the time specified by the Federal Rules.

On January 8, 2013, the Complaint, Summonses and all other initiating documents in this lawsuit were served on Defendants via email and publication (pursuant to Court's December 24, 2012 Order permitting alternative service). A declaration of service, certifying that the forgoing service was completed, was filed with the Court on January 18, 2013.<sup>1</sup> More than 21 days have elapsed since service was performed. The Defendants have not been granted any extension of time to respond to the Complaint. Defendants have failed to answer or otherwise respond to the Complaint, or serve any answer or other response on Plaintiff's attorney of record.

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<sup>1</sup> The declaration of service was initially filed under seal on January 18, 2013 and served on Defendants. After the seal was lifted, the declaration of service could not be located by the Court. Plaintiff re-filed, via ECF, the declaration of service on March 15, 2013 [D.E. 19].

A proposed Certificate of Default is submitted for the Court's convenience.

Respectfully submitted  
for Plaintiff,

By: s/ Jeffrey A. Lindenbaum  
Jeffrey A. Lindenbaum (JL-1971)  
Jess M. Collen (JC-2875)  
COLLEN *IP*  
The Holyoke-Manhattan Building  
80 South Highland Avenue  
Town of Ossining  
Westchester County, New York 10562  
(914) 941 5668  
(914) 941-6091 (facsimile)  
[jlindenbaum@collenip.com](mailto:jlindenbaum@collenip.com)

Dated: March 22, 2013

**CERTIFICATE OF SERVICE**

I Jeffrey A. Lindenbaum certify that on March 22, 2013 I served the foregoing Request for Entry of Default on the Defendants via email, by sending same to the emails listed in the attached schedule A, and by posting same on the website [www.notice-lawsuit.com](http://www.notice-lawsuit.com) in accordance with the Court's December 24, 2012 Order permitting service by alternative means.

s/ Jeffrey A. Lindenbaum  
Jeffrey A. Lindenbaum

Dated: March 22, 2013

## SCHEDULE A

<a href="http://www.watches-vogue.com">http://www.watches-vogue.com</a>	Xie Zhenmin / Zhenmin Xie	admin@watches-vogue.com service@watches-vogue.com yangb0593@gmail.com zhilinyang135@gmail.com
<a href="http://www.watchdear.com">http://www.watchdear.com</a>	Shenzhen Lai Wode Technology Co., Ltd. / qixi lou	admin@watchdear.com service@watch-dear.com yangliufang89@gmail.com yangliufang89@gmail.com
<a href="http://www.queenofwatches.com">http://www.queenofwatches.com</a>	EC Brother / Li Lin	qu4676923903401@domainshield.com qu4676923392004@domainshield.com queenofwatches@gmail.com noorderinfos@gmail.com marryxie1987@gmail.com yuntingchiu@hotmail.com 121641514@qq.com ecpurchasecom@hotmail.com ecshinecom@hotmail.com paynowgoods@gmail.com interact100803@hotmail.com yinhaiping0514@gmail.com yinjiping1@gmail.com
<a href="http://www.replicaup.com">http://www.replicaup.com</a>	Is shaped Design Co., Ltd. / Wang Junxi	admin@replicaup.com service@replicaup.com yangliufang78@gmail.com yangb0593@gmail.com yangb0593@gmail.com qingronguk@gmail.com kevin-wangxian@hotmail.com, aillyok1987@hotmail.com, 394773602@qq.com, 2441153645@qq.com, willacather777@hotmail.com kc Zhang63@gmail.com paymentlingerie@gmail.com yliufang1983@gmail.com zhangwh2019@gmail.com yangliufang78@gmail.com
<a href="http://www.watchmimic.com">http://www.watchmimic.com</a>	Shanghai Jing Hao Machinery Co., Ltd. / Wang, Jinglei	admin@watchmimic.com service@watchmimic.com yangliufang78@gmail.com yangb0593@gmail.com yangliufang78@gmail.com

<a href="http://www.watchkind.com">http://www.watchkind.com</a>	Guangren Wang	admin@watchkind.com
		service@watchkind.com
		yangliufang78@gmail.com
		yangb0593@gmail.com
		yjianyu1986@gmail.com
		yangliufang78@gmail.com
<a href="http://www.myfavomega.com/">http://www.myfavomega.com/</a>	PrivacyProtect.org / Domain Admin/jianxian li	contact@privacyprotect.org
		<a href="mailto:1007128333@qq.com">1007128333@qq.com</a>
		service@myfavomega.com
		<a href="mailto:lidong885@yahoo.com">lidong885@yahoo.com</a>
<a href="http://www.omegaonlineoutlet.com">http://www.omegaonlineoutlet.com</a>	PrivacyProtect.org / Domain Admin / jianxian li	contact@privacyprotect.org
		<a href="mailto:1007128333@qq.com">1007128333@qq.com</a>
		<a href="mailto:salewatchesstore@gmail.com">salewatchesstore@gmail.com</a>
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		<a href="mailto:salewatchesstore@gmail.com">salewatchesstore@gmail.com</a>
<a href="http://www.omegaonlineoutlet.net">http://www.omegaonlineoutlet.net</a>	bony huny	bhu38@yahoo.com
		<a href="mailto:salewatchesstore@gmail.com">salewatchesstore@gmail.com</a>
<a href="http://www.qualityreplica.biz">http://www.qualityreplica.biz</a>	PrivacyProtect.org / Domain Admin / jianxian liu	contact@privacyprotect.org
		service@wr48.raybangood.com
		<a href="mailto:jianxian.liu@yahoo.com">jianxian.liu@yahoo.com</a>
		omg3888@hotmail.com
<a href="http://www.qualityreplica.info/">http://www.qualityreplica.info/</a>	meng luo	Luomeng96@yahoo.com
		service@wr48.raybangood.com
<a href="http://www.qualityreplica.us">http://www.qualityreplica.us</a>	menge luony	Luomeng96@yahoo.com
		service@wr48.raybangood.com
<a href="http://www.bestreplicawatchesok.com/">http://www.bestreplicawatchesok.com/</a>	fiore paul	marvakjq@hotmail.com
<a href="http://www.swisskiss.net/">http://www.swisskiss.net/</a>	Mingqin Liu	admin@swisskiss.net
		cflong1988@gmail.com
<a href="http://www.sinohorloge.com/">http://www.sinohorloge.com/</a>	zhu yong	sinohorloge@163.com
		gloria8.kim@gmail.com
		agape789123@hotmail.com

<a href="http://www.salesswiss.com/">http://www.salesswiss.com/</a>	Xie Jun	zhengpinsale@163.com service@swisssale.net jiayinsale@gmail.com
<a href="http://watchesyes.net/">http://watchesyes.net/</a>	fan	pong2987@126.com watchesyes@126.com pong2987@126.com
<a href="http://replicavip.org/">http://replicavip.org/</a>	PrivacyProtect.org / Domain Admin / Bolelov Aleksandr Valentinovich	contact@privacyprotect.org albolelov@gmail.com
<a href="http://www.watchc.com/">http://www.watchc.com/</a>	Li guangping	swisseta@qq.com zhuaxiao222@gmail.com pcopal@gmail.com hongshengmachine@gmail.com, hongshengmachine.@gmail.com ptjoinhello@gmail.com johnzhao911@gmail.com meimery3@gmail.com trustytimes@gmail.com
<a href="http://www.watchespay.net/">http://www.watchespay.net/</a>	Guangzhou Shouai Trading Co., Ltd / zhang shunliang	zhangxian108@163.com service@watchespay.net zhangxian108@163.com
<a href="http://www.replicabuy.net/">http://www.replicabuy.net/</a>	Optical Automation Instrument Co., Ltd. / Zhan Lixiong	admin@replicabuy.net service@replicabuy.net shunhe1987@gmail.com zgwan1982@gmail.com zmqiong1970@gmail.com
<a href="http://www.watch7750.com/">http://www.watch7750.com/</a>	lai shuang	hongfeida2008@163.com sales@watch7750.com domain@abcde.cn
<a href="http://www.swisssale.net">http://www.swisssale.net</a>	Xiaojie Ma	admin@swisssale.net service@swisssale.net
<a href="http://www.replicafind.net/">http://www.replicafind.net/</a>	Li Yuanming	admin@replicafind.net service@replicafind.net

<a href="http://www.salesreplicas.com/">http://www.salesreplicas.com/</a>	weichengwang	salesreplicas@yeah.net
<a href="http://www.replicawalker.com/">http://www.replicawalker.com/</a>	yang, baoling	ebuys000000@21cn.com bigexporters@gmail.com bigexporters@gmail.com
<a href="http://replicaprice.com/">http://replicaprice.com/</a>	Intellectual Property Agency Ltd. / Jie Xu	admin@replicaprice.com nameshoufeng@163.com replicaprice2011@gmail.com zhilinyang135@gmail.com service@replicasold.com yangliufang67@gmail.com hellopt2001@gmail.com xiaozhenzhang23@gmail.com shunliang301@gmail.com zhiboyang12@gmail.com xiuying1968@gmail.com cxiao1995@gmail.com guowan5@gmail.com yangliufang67@gmail.com
<a href="http://www.watchesfull.com">http://www.watchesfull.com</a>	Zhi Technology Co., Ltd. / Yukun Cui	admin@watchesfull.com service@watchesfull.com cxiao2015@gmail.com fengj2018@gmail.com zhonggw2012@gmail.com xiuying1968@gmail.com

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v.

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Defendants.

Civil Action No.: 12-cv-9338 (SAS)

**CERTIFICATE OF DEFAULT**

I, Ruby J. Krajick, Clerk of the Court of the United States District Court for the Southern District of New York, do hereby certify that the Defendants have failed to Respond to or Answer the Complaint, or otherwise appear in this action. A certificate of default is hereby entered against all named Defendants, pursuant to Fed. R. Civ. P. 55(a).

Dated: \_\_\_\_\_, 2013  
New York, NY

Ruby J. Krajick  
Clerk of Court

\_\_\_\_\_  
Deputy Clerk