

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED IN  
SCHEDULE “A” HERETO,

Defendants.

**Case No. 1:24-cv-02809-JCD**

**HONORABLE JEREMY C. DANIEL  
MAGISTRATE MARIA VALDEZ**

Hearing Date: January 16, 2025

Hearing Time: 9:30 AM

Courtroom: 1419

**PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT PURSUANT TO FRCP 56  
AGAINST THE IDENTIFIED SCHEDULE “A” DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”) hereby moves for entry of summary judgment pursuant to Federal Rule of Civil Procedure 56 (“Rule 56”) against the identified Schedule “A” Defendants (the “Defendants”), which have been separately listed in paragraph 3 to the accompanying Declaration of Shawn A. Mangano, Esq. (the “Mangano Decl.”). Plaintiff’s Motion is made and based upon the supporting Memorandum of Law, the Mangano Declaration, the papers and pleadings on file in this action, and any argument of counsel the Court may entertain.

DATED: January 10, 2025

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (IL Bar No. 6299408)

**BAYRAMOGLU LAW OFFICES LLC**

1540 West Warm Springs Road Ste. 100

Henderson, NV 89014

Tel: (702) 462-5973 | Fax: (702) 553-3404

shawnmangano@bayramoglu-legal.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of January 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing (the “ECF”) system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third party, AliExpress.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (IL Bar No. 6299408)  
**BAYRAMOGLU LAW OFFICES, LLC**

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**PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION FOR  
SUMMARY JUDGMENT PURSUANT TO FRCP 56 AGAINST  
THE IDENTIFIED SCHEDULE “A” DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”) submits the following memorandum of law in support of its request for entry of summary judgment (the “Motion”) pursuant to Federal Rule of Civil Procedure 56 (“Rule 56”) against the identified Schedule “A” Defendants (the “Defendants”), which are listed in paragraph 3 to the accompanying Declaration of Shawn A. Mangano, Esq. (the “Mangano Decl.”).

Plaintiff’s Motion is made and based upon the pleadings and papers on file in this action, the Mangano Decl., the papers and pleadings on file in this action, and any argument of counsel the Court may entertain.

**I. INTRODUCTION**

Through the Motion, Plaintiff requests entry of summary judgment against the Defendants on the company’s copyright infringement and for violation of the Illinois Uniform Deceptive Trade Practices Act (“Deceptive Trade Practices Act”). Plaintiff’s request for entry of summary judgment

against the Defendants is based on their collective failure to timely respond to the company's requests for admission propounded pursuant to Rule 36 of the Federal Rules of Civil Procedure ("Rule 36"), as well as other propounded written discovery requests. (Mangano Decl. 6, Ex. A, 7.) Defendants' failure to respond to Plaintiff's requests for admission conclusively establishes the facts requested to be admitted or denied therein. *See United States v. Kasuboski*, 834 F.2d 1345, 1350 (7th Cir. 2012) *accord* Fed.R.Civ.P. 56(a)(3).

Given the Defendants' failure to respond to Plaintiff's requests for admission, the company is entitled to entry of summary judgment on its copyright infringement claim for relief. Dkt. No. 1 at 8-12. Specifically, Plaintiff asserts that the Defendants' failure to respond to the company's requests for admission conclusively establishes their unauthorized use of the federal copyright protected image reflected in the registered copyright asserted in this action - VA0002379894 (the "Copyright Protected Image") in connection with offering, and selling, counterfeit Rotita brand products on the Aliexpress online sales platform (the "Platform"). Dkt. No. 1, Ex. 1 to Complaint. Plaintiff requests an award of statutory damages, enhanced for willful infringement, entry of a permanent injunction, and an award of attorneys' fees and costs through entry of summary judgment on its copyright infringement claim for relief. *See* 17 U.S.C. 502(a) (permanent injunctive relief) 17 U.S.C. 504(c)(1) (statutory damages) 17 U.S.C. 504(c)(2) (enhanced statutory damages for willful infringement) 17 U.S.C. 505 (an award of attorneys' fees and costs).

In the event the Court denies Plaintiff's request for entry of permanent injunctive relief and an award of attorneys' fees is not granted under its copyright infringement claim, then such relief should be granted through entry of summary judgment on its violation of the Deceptive Trade

Practices Act claim as asserted in the company's Complaint.<sup>1</sup> Dkt. No. 1 at 13. Such relief is authorized under 815 ILCS 510/3.

As argued below, Plaintiff is entitled to entry of summary judgment pursuant to Rule 56 on its copyright infringement and its violation of the Deceptive Trade Practices Act claims for relief. This result is compelled by the Defendants' failure to respond to Plaintiff's requests for admission, which conclusively establish their liability for these claims for relief based on their failure to respond as required under Rule 36.

## **II. APPLICABLE LEGAL STANDARDS**

Summary judgment is proper if the "pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." Fed.R.Civ.P. 56(c) *see also Celotex Corp. v. Catrett*, 477 U.S. 317, 322-33 (1986). A genuine issue of material fact exists when there is evidence on the basis of which a reasonable jury could find in the plaintiff's favor, allowing for all reasonable inferences drawn in a light most favorable to the plaintiff. *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 255 (1986). Once the moving party presents a *prima facie* case showing that it is entitled to judgment as a matter of law, the non-moving party may not rest upon the mere allegations or denials in its pleading but must set forth specific facts showing that a genuine issue for trial exists. *Id.* at 256-57.

"Admissions made under Rule 36, even default admissions, can serve as the factual predicate for summary judgment." *Kasuboski*, 834 F.2d at 1350 (citation omitted). "Rule 36(b)

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<sup>1</sup> In requesting entry of summary judgment, Plaintiff is not seeking any relief through the False Designation of Origin claim for relief asserted in its Complaint as such relief would be duplicative of that sought through its copyright infringement and Deceptive Trade Practices Act claims for relief.

provides that a matter admitted is conclusively established.” *Id.* (citing Fed.R.Civ.P. 36(b)). Moreover, “ s ection (c) of Rule 56 provides:

The judgment sought shall be rendered forthwith if the pleadings, depositions, answer to interrogatories, and *admissions on file*, together with the affidavits, show that there is no genuine issue as to any material fact and that the moving party is entitled to judgment as a matter of law.

*Id.* (citing Fed.R.Civ.P. 56(c), emphasis in original). Requests for admission are deemed admitted if a response is untimely or no response is provided within thirty (30) days after service unless otherwise extended through the agreement of counsel. Fed.R.Civ.P. 36(a)(3).

Here, Plaintiff asserts that it is entitled to entry of summary judgment because the Defendants have failed to, among other things, timely respond to propounded requests for admission. (Mangano Decl. 6-7 10, Ex. A.) As such, Plaintiff has “conclusively established” the Defendants’ liability for the asserted copyright infringement claim, as well as its Deceptive Trade Practices claim, in this case. (*See id.* 6, Ex. A at 6-8.) Accordingly, entry of summary judgment against the Defendants is appropriate under Rule 56.

### **III. ARGUMENT**

#### **A. JURISDICTION AND VENUE ARE PROPER IN THIS COURT.**

This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Copyright Act, 17 U.S.C. 101, et seq., 28 U.S.C. 1338(a) (b) and 28 U.S.C. 1331. Dkt. No. 1 at 2-3, 11 at 2-3. Venue is proper in this Court pursuant to 28 U.S.C. 1391, and this Court may properly exercise personal jurisdiction over the Defendants since each of them directly targets business activities toward consumers in Illinois and causes harm to Plaintiff’s business within this judicial district. Dkt. Nos. 1 at 2-3, 11 at 2-3 *see also uBID, Inc. v. GoDaddy Grp., Inc.*, 623 F.3d 421, 423-24 (7th Cir. 2010) (without benefit of an evidentiary hearing, plaintiff bears only the burden of making a prima facie case for personal jurisdiction all

of plaintiff's asserted facts should be accepted as true and any factual determinations should be resolved in its favor). In fact, based on their failure to respond to Plaintiff's requests for admission, the Defendants have admitted that personal jurisdiction can be properly exercised against them based on direct sales to the State of Illinois through the display of the Copyright Protected Images without authorization to do so. (*See* Mangano Decl. 6, Ex. A at 6-7, 14-15.)

In addition to the foregoing, the Court has determined that it can properly exercise specific personal jurisdiction over the Schedule "A" Defendants, which includes doing so over the Defendants, in issuing the TRO requested by Plaintiff on July 17, 2024 Dkt. No. 23 and in issuing a preliminary injunction on August 14, 2024. Dkt. No. 33. Accordingly, it is unquestionable that the Court can properly exercise personal jurisdiction over Defendants in this action.

**B. PLAINTIFF IS ENTITLED TO SUMMARY JUDGMENT AGAINST THE DEFENDANTS UNDER RULE 56.**

Under Rule 56, summary judgment is proper if the "pleadings, depositions, answers to interrogatories, and admissions on file, together with the affidavits, if any, show that there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." Fed.R.Civ.P. 56(c) *see also Celotex Corp.*, 477 U.S. at 322-33. A genuine issue of material fact exists when there is evidence on the basis of which a reasonable jury could find in the non-moving party's favor, allowing for all reasonable inferences drawn in a light most favorable to that party. *Anderson*, 477 U.S. at 255.

Plaintiff is entitled to entry of summary judgment under Rule 56 for its copyright infringement and violation of the Deceptive Trade Practices Act claims for relief based because no genuine issues of material fact exist as to the Defendants' liability for these claims based on their collectively failure to respond to requests for admission as required by Rule 36. Stated directly, the Defendants' failure to respond to Plaintiff's requests for admission conclusively

establishes the matters deemed admitted therein. *See Kasuboski*, 834 F.2d at 1350 (citing Fed.R.Civ.P. 36(b)). Since the Defendants’ deemed admission for failing to respond to the propounded requests for admission include genuine issues of material fact establishing their liability for copyright infringement and violation of the Deceptive Trade Practices Act, Plaintiff is entitled to summary judgment on these claims for relief. Moreover, should summary judgment be entered against the Defendants, this case should be closed as all claims asserted against the named Schedule “A” Defendants will have been fully and finally adjudicated.

**1. *Plaintiff is Entitled to Entry of Summary Judgment for Copyright Infringement.***

Turning first to Plaintiff’s entitlement to entry of summary judgment on its copyright infringement claim based on the Defendants’ failure to respond to the company’s requests for admission as required by Rule 36. As noted above, “a dmissions made under Rule 36, even default admissions, can serve as the factual predicate for summary judgment.” *Kasuboski*, 834 F.2d at 1350 (citation omitted). “Rule 36(b) provides that a matter admitted is conclusively established.” *Id.* (citing Fed.R.Civ.P. 36(b)). This is precisely the facts presented to the Court and upon which Plaintiff’s request for entry of summary judgment is based.

Specifically, Plaintiff served the Defendants with written discovery requests, which included requests for admission, on October 23, 2024. (Mangano Decl. 6, Ex. A.) On November 25, 2024, when the propounded written discovery requests were due, no response was received by any of the Defendants. (*Id.* 7.) In fact, as of the filing of this Motion, none of the Defendants have responded to Plaintiff’s propounded requests for admission or requests for production of documents. (*Id.*) Moreover, absolutely no communications have been received from the Defendants concerning Plaintiff’s written discovery requests. (*Id.*) As such, the factual matters set forth in Plaintiff’s requests for admission are deemed to have “conclusively established” against



the Defendants. *See Kasuboski*, 834 F.2d at 1350 (citing Fed.R.Civ.P. 36(b)). Quite simply, Defendants have apparently elected to hide behind the shield of the Platform, which has routinely refused to produce sales information, challenged the merits of this Court's TRO and preliminary injunction, and that is well-known to refuse enforcement of default judgment orders entered by United States Federal District Courts. (Mangano Decl. 7.)

To prove copyright infringement, a plaintiff must show: "(1) ownership of a valid copyright and (2) copying of constituent elements of the work that are original." *JWC Invs., Inc. v. Novelty, Inc.*, 482 F.3d 910, 914 (7th Cir. 2007). A certificate of copyright registration provides a *prima facie* presumption of validity. *Mid. American Title Co. v. Kirk*, 59 F.3d 719, 721 (7th Cir. 1995). Here, Plaintiff has alleged its ownership of the asserted Copyright Protected Image in its Complaint Dkt. No. 1 at 9 and has supplied the Court with a summary of the registration issued by the United States Copyright Office Dkt. No. 1-1 .

In addition to the above, the unanswered requests for admission served on the Defendants further demonstrate Plaintiff's entitlement to entry of summary judgment on its copyright infringement claim for relief. (Mangano Decl. 6-7, Ex. A.) Specifically, Plaintiff's propounded requests for admission have asked each of the Defendants to admit, at least, the following facts: (1) that Plaintiff is the owner of the Copyright Protected Image asserted in this action (2) that they have solicited and obtained purchases from the public through the unauthorized display of Plaintiff's Copyright Protected Image on the Platform (3) that they copied or obtained Plaintiff's Copyright Protected Image directly from the company's website or through an unlicensed, unauthorized third party and (4) that they performed no investigation as to whether the Copyright Protected Image were subject to any federal copyright registrations prior to being displayed on their online storefronts maintained on the Platform. (*See* Mangano Decl. 6, Ex A at 6-9, 13-24.)

The foregoing factual admissions, which are deemed conclusively established, demonstrate Plaintiff's ownership of the asserted Copyright Protected Image, and the Defendants' unauthorized display of same in offering products for sale through their online storefronts maintained on the Platform. As such, the Defendants' liability for infringement of Plaintiff's Copyright Protected Image is clearly and indisputably established. *See JWC Invs., Inc.*, 482 F.3d at 914. Accordingly, Plaintiff is entitled to entry of summary judgment pursuant to Rule 56 on its copyright infringement claim for relief asserted against the Defendants.

**a. *Plaintiff is entitled to entry of a permanent injunction.***

Based on the Defendants' established infringement of Plaintiff's Copyright Protected Image, as argued above, the company is entitled to entry of a permanent injunction pursuant to 17 U.S.C. 502(a). Plaintiff has previously demonstrated its entitlement to entry of temporary and preliminary injunctive relief in this action. Dkt. Nos. 23, 33. The Defendants' failure to respond to Plaintiff's requests for admission serve to only further solidify the Court's prior determinations and conclusively establishes the company's entitlement to permanent injunctive relief against these entities under 17 U.S.C. 502(a). Accordingly, Plaintiff is entitled to entry of a permanent injunction against the Defendants based on their infringement of the Copyright Protected Image pursuant to Rule 56.

**. *Plaintiff is Entitled to Recover Statutory Damages.***

Next, Plaintiff asserts that it is entitled to recover statutory damages against the Defendants under 17 U.S.C. 504(c)(1) for copyright infringement. As a threshold matter, this is an election of remedies granted to the plaintiff in a copyright infringement action. *See* 17 U.S.C. 504(c)(1).

Here, Plaintiff elects to seek an award of statutory damages in the amount of 5,000 per infringed Copyright Protected Image by the Defendants. This requested statutory damage award

is justified by the reasonable settlement amounts agreed to by Plaintiff in multiple copyright infringement actions commenced in this judicial district and the statutory damage awards authorized by other Courts in this judicial district. (Mangano Decl. 8.) The requested statutory damage award is also consistent with Plaintiff having conclusively established the Defendants' infringement of its Copyright Protected Image.

Finally, the Defendants' failure to respond to any of Plaintiff's propounded written discovery has deprived the company of its ability to meaningfully analyze its right to recover actual damages in this action, which further demonstrates its entitlement to recover statutory damages. *See White v. Marshall*, 771 F.Supp.2d 952, 956 (E.D. Wis. 2011) *see also Wondie v. Mekuria*, 742 F.Supp.2d 118, 124-25 (D.D.C. 2010) *Lifted Research Grp., Inc. v. Behdad, Inc.*, 591 F.Supp.2d 3, 8 (D.D.C. 2008). Simply put, under these circumstances, Plaintiff is essentially placed in the position of a party seeking entry of a default judgment without the benefit of meaningful infringing sales discovery. *Ibid.* Accordingly, Plaintiff respectfully requests an award of 5,000 per infringement of the Copyright Protected Image as statutory damages against the Defendants pursuant to 17 U.S.C. 504(c)(1). (Mangano Decl. 8, Ex. B, which is a table summarizing the statutory damages sought against the Defendants on a 5,000 per infringement of each Copyright Protected Image by each Defendant.)

**c. *Plaintiff is entitled to enhanced damages for willful infringement.***

Plaintiff additionally maintains that it is entitled to enhanced statutory damages against the Defendants based on their willful infringement of the Copyright Protected Image. In this regard, the Defendants' failure to respond to Plaintiff's propounded requests for admission establish the company's entitlement to such relief under 17 U.S.C. 504(c)(2).

Specifically, the Defendants' failure to respond to the propounded requests for admission has conclusively established the following facts: (1) that they displayed the Copyright Protected Image without authorization to do so in offering products for sale on their online storefronts maintained with the Platform (2) that they did so without performing any investigation as to the right to display the Copyright Protected Image and (3) that they have been accused of other acts of copyright infringement, trademark infringement, and unfair competition on the Platform and otherwise. (*See* Mangano Decl. 6, Ex. A at 13.)

These facts demonstrate a willful and intentional disregard for Plaintiff's federally registered rights in and to the Copyright Protected Image. Based on these circumstances, Plaintiff asks that the issued statutory damage award be trebled based on the Defendants' willful infringement of the Copyright Protected Image. Accordingly, Plaintiff requests the Court award enhanced damages of 15,000 per infringement of each of the Copyright Protected Image by each Defendant. (Mangano Decl. 8, Ex. B, which is a table summarizing the statutory damages sought against the Defendants on a 5,000 per infringement of each Copyright Protected Image together with the treble enhanced damages sought against each said Defendant for willful infringement.)

**2. *Plaintiff is Entitled to Entry of Summary Judgment for its Deceptive Trade Practices Claim.***

Based on the foregoing admissions that have been conclusively established by the Defendants' failure to respond to Plaintiff's requests for admission, the Defendants are equally liable for violation of the Deceptive Trade Practices Act. Dkt. No. 1 at 13. Simply put, the Defendants should be found to have willfully violated Plaintiff's federally protected rights to exclusively display the Copyright Protected Image. Moreover, the Defendants have done so to promote the sale of knockoff and/or counterfeit goods to consumers in the State of Illinois by representing, through the unauthorized display of the Copyright Protected Image, that their

products were authentic. Accordingly, the Defendants have conclusively committed acts that constitute a violation of the Deceptive Trade Practices Act, thereby entitling Plaintiff to entry of a permanent injunction and an award of attorneys' fees and costs under 815 ILCS 510/3.

Granted, Plaintiff's Deceptive Trade Practices Act claim for relief is mostly duplicative if the Court grants summary judgment on its copyright infringement claim, enters permanent injunctive relief, and awards statutory damages against the Defendants. Nevertheless, the circumstances, at a minimum, warrant granting issuance of permanent injunctive relief and an award of attorneys' fees and costs for willful violation of the Deceptive Trade Practices Act under 815 ILCS 510/3 as alternative grounds for such relief. Accordingly, the Court should enter summary judgment in Plaintiff's favor and against the Defendants on its Deceptive Trade Practices Act claim for relief.

#### IV. CONCLUSION

Based on the foregoing, Plaintiff respectfully requests the Court grant summary judgment in its favor and against the Defendants on its copyright infringement and Deceptive Trade Practices claims for relief in addition to granting such other relief as it deems just and appropriate.

DATED: January 10, 2025

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (IL Bar No. 6299408)

**BAYRAMOGLU LAW OFFICES LLC**

1540 West Warm Springs Road Ste. 100

Henderson, NV 89014

Tel: (702) 462-5973 | Fax: (702) 553-3404

shawnmangano@bayramoglu-legal.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of January 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing (the “ECF”) system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third party, AliExpress.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (IL Bar No. 6299408)  
**BAYRAMOGLU LAW OFFICES, LLC**

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MAGISTRATE MARIA VALDEZ**

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**PLAINTIFF’S STATEMENT OF UNDISPUTED FACTS**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”), hereby submits the following Statement of Undisputed Facts and Conclusions of Law in Support of its Motion for Summary Judgment (the “Motion”), which is supported by the accompanying Declaration of Shawn A. Mangano, Esq. (the “Mangano Decl.”) submitting in connection with Plaintiff’s Motion:

1. There are no genuine issues of material fact that Plaintiff is the owner of the asserted Copyright Protected Images
2. There are no genuine issues of material fact that the Court has specific personal jurisdiction over the Defendants
3. There are no genuine issues of material fact that the Defendants have displayed the Copyrighted Protected Images without authorization in connection with the solicitation of purchases by the consuming public

4. There are no genuine issues of material fact that the Defendants copied or obtained Plaintiff's Copyright Protected Images directly from the company's website or through an unlicensed, unauthorized third party and

5. There are no genuine issues of material fact that the Defendants' infringement was committed without an investigation as to rights held by any other third parties, thereby warranting a finding of willful infringement of the asserted Copyright Protected Images.

<b>Undisputed Fact No.</b>	<b>Description of Undisputed Fact</b>	<b>Evidentiary Support</b>
1	Plaintiff is the owner of the asserted Copyright Protected Images	<i>See, e.g.</i> , Mangano Decl. 6, Ex. A at 6-7, 14-15 Dkt. No. 1-1, Ex. 1 Dkt. No. 23 Dkt. No. 33.
2	The Court has specific personal jurisdiction over the Defendants	Mangano Decl. 6, Ex. A at 6-7, 14-15 Dkt. No. 23 Dkt. 33.
3	Defendants have displayed the Copyright Protected Images without authorization in connection with the solicitation of purchases by the consuming public	<i>See, e.g.</i> , Mangano Decl. 6, Ex. A at 6-9, 13-14, Dkt. No. 23 Dkt. No. 33.
4	Defendants copied or obtained Plaintiff's Copyright Protected Images directly from the company's website or through an unlicensed, unauthorized third party	<i>See, e.g.</i> , Mangano Decl. 6, Ex. A at 6-9, 13-14.
5	The Defendants' infringement was committed without an investigation as to rights held by any other third parties	<i>See, e.g.</i> , Mangano Decl. 6, Ex. A at 6-9, 13-14.



DATED: January 10, 2025

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (IL Bar No. 6299408)

**BAYRAMOGLU LAW OFFICES LLC**

1540 West Warm Springs Road Ste. 100

Henderson, NV 89014

Tel: (702) 462-5973 | Fax: (702) 553-3404

shawnmangano@bayramoglu-legal.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of January 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing (the “ECF”) system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third party, AliExpress.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (IL Bar No. 6299408)  
**BAYRAMOGLU LAW OFFICES, LLC**

**IN THE UNITED STATES DISTRICT COURT  
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**HONORABLE JEREMY C. DANIEL  
MAGISTRATE MARIA VALDEZ**

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**DECLARATION OF SHAWN A. MANGANO IN SUPPORT OF  
MOTION FOR SUMMARY JUDGMENT**

I, Shawn A. Mangano, of the City of Las Vegas, in the State of Nevada, declare as follows:

1. I am over the age of 18 years. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am lead counsel for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own knowledge unless stated otherwise.

2. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

3. I make this declaration in support of Plaintiff's Motion for Summary Judgment (the "Motion"), against the following Defendants:

<b>DEFENDANT NO</b>	<b>NAME</b>
1	ALAM Store Shenzhen Fashion Point E-commerce LTD.
2	001 Factory Store
3	003 Factory Store
4	01 Small Fish Store
5	A Promise Clothes Store
6	Abandon Red Store Shenzhen Shengxing Fei Technology Co.
7	ABC BIKINI Store Putian City Valerian Yao Trading Co. Ltd.
8	Active Fitness Outdoors
9	Adent Store
10	Ali May Store
11	AliClothes Store
12	AOMEI Global Store Zhongshan Nuoshang Clothing Co. Ltd.
14	Aring Dropshipping Store SHENZHEN OMEDA HOME CO., LTD
15	Art Life drop shipping Store
16	bang boom Store
17	Beach Fun Swimsuit Store
18	Beautiful 7 Store
19	Belleyoo Store
20	BELOVING Cloths Store

<b>DEFENDANT NO</b>	<b>NAME</b>
21	Bertas FashionClothesFactory Store Fuzhou Betas Trading Co., Ltd.
22	Bling Star Store Guangzhou Beianzhi Trading Co., Ltd
23	Bluelans Fashion Clothes Store Shenzhen Hengdaqi Network Technology Co., Ltd.
24	Brown CBC Store
25	Buy happiness Store
26	B G Girl Store
27	Chacs Store
28	Chamliforve Africa Clothes Store
29	Cheerful Kids Life Toy City Store
30	Chic Beauties
31	Chunchen DropShipping Store Hefei Chunchen Network Technology Co., Ltd.
32	Classic Outfit Store
33	CLOTHE YOUR LIFE Store Shenzhen Huitai San Trading Co., Ltd.
34	Cure Drop Shipping Store
35	Divine- Store
36	DressFashionFactory Store
37	Dropshipping Choice Store
38	Dropshipping Shenzhen China Clothes Store
39	DropshippingY2K Store

DEFENDANT NO	NAME
40	Duo Le i Duo Duo Store
41	DUTRIEU Sexy Store Kunming Stone Attribution Thousand Trading Co., Ltd.
42	Easier for Life Store
43	Ebuy dropshipping Store
44	Ebuying online
45	Ele-choices Store
46	Elegant Store
47	Engine City Store
48	Eternal Esther Store
49	Everything Possible Store
50	FAIRY SEASON Store
51	Fanbety Apparel Store
52	Fanbety Store
53	Fancy Clothing Store
54	Fascination Beauty Store
55	Fashion ueen Love Store
56	Fashion Women Garment
57	Fashion Women Garment Store
58	Fashionable Clothes Code Store

DEFENDANT NO	NAME
59	Faxion Store
60	fei Store
61	Flashe Store
62	freestlye Store
63	F CHAO Store
64	Gluehwein Clothes Store
65	GUO SWIMSUIT Store uanzhou Yunou Trading Co., Ltd.
66	Heavy Discount Clothes Store
67	HI RENAISSANCE Store
68	Hi Sexy Girl Store
69	HIAVAVA Store ingcheng ianyu Garment Factory
70	HUAJUANER DISCOUNT Store Zhenping Huajuan Trading Co., Ltd.
71	IMDVC Official Store
72	JomooC Store Shenzhen Songmei Lian Technology Co., Ltd.
73	JUCLEO Official Store
74	Kawaii Clothes Wholesale Store
75	KongClothes Store
76	Ladifasin Store Twenty-three (Shenzhen) Electronic Commerce Co., Ltd.
77	Lily Cheap Clothing Store

DEFENDANT NO	NAME
78	Lipswag Store New Situ Technology (Shenzhen) Co., Ltd.
79	lipswag Swimwear Store
80	LLYY beach Store
81	Loive Store
82	Loving secret store
83	LS-fullhouse Store
84	Lslaica women s Store
85	Luckys Sports Store
86	lucylady Store
87	LUO IAO HEI Store
88	MAFIRRY Sexy Store
89	Mandy Mandy Store
90	Mandylandy Apparel Store
91	Mandylandy Trend Store Store
92	Margotladys Store
93	Men s Shirt Hoodie Store Store
94	Mi Mi Store
95	MICAH2FIRST Store
96	Minimalist kk Store



<b>DEFENDANT NO</b>	<b>NAME</b>
97	Missyou Muses Store
98	Mr.22 Store
99	MSLL Store
100	MUSBEMA Store
101	My clothes Store
102	Ocsplus Boutique Store
103	OFS 49 Store Shangrao Ofei Shang Technology Co., Ltd.
104	One And Only Fishion Store
105	Oufisun 55 Store
107	Personalization Clothing
108	PETROVIC Ali-fashion
109	PLSIF Official Store
110	PLUS SIZE BIKINI Store
111	Pretty Clothes Store
112	Princess Of Butterfly Store
113	Rachel s Clothes Store
114	Rainbowlike2021 Store
115	RE Wearing Store
116	Rose Apparel Store

DEFENDANT NO	NAME
117	RyansJewelry Store
118	RyansWatch Store
119	SEABBBOT Store
120	See you 99 Store
121	sexy barbie Store
122	SE Y SWIMSUIT SHOP Store
123	Shop1102089618 Store
124	Shop1102112377 Store
125	Shop1102372800 Store
126	Shop1102474073 Store
127	Shop1102602785 Store
128	Shop1102694969 Store
129	Shop1102802496 Store
130	Shop1102856073 Store
131	Shop1102951053 Store
132	Shop1102964364 Store
133	Shop1102994011 Store
134	Shop1103009240 Store
135	Shop1103199553 Store

<b>DEFENDANT NO</b>	<b>NAME</b>
136	Shop1103207479 Store
137	Shop1103276252 Store
138	Shop1103304670 Store
139	Shop1103322979 Store
140	Shop1103326345 Store
141	Shop1103471271 Store
142	Shop110--ljl-yy1 Store
143	Shop4808172 Store
144	Shop4923029 Store
145	Shop5790089 Store
146	Shop5800592 Store
147	Shop5886157 Store Ouyas (Shenzhen) Industrial Co., Ltd.
148	Shop900254458 Store
149	Shop911251404 Store
150	Showyer Clothes Store
151	Sicilian girl Store
152	SIMOVIA Official Store
153	Simptoo Store
154	Soochic Store

DEFENDANT NO	NAME
155	sssochic Store
156	StyleDesign Women Store
157	Sukienki Official Store
158	Sumi Lavi Apparel Store
159	Sumilavi Dropshipping Store
160	Sunfree Store
161	Swallow Women Store
162	TMALE Store Shenzhen Doha Forest Technology Co., Ltd
163	To Be Male Universe
164	To Be Male Universe Clothing Store
165	To Be The First Store Shenzhen in Core Network Technology Co., Ltd.
166	Tsukimi003 Store Wuhan Zhuzhi Mei Trading Co., Ltd
167	Two Per Thousand Official
168	Two Per Thousand Official Store
169	Urban Women Store
170	VACATION BIKINI Store
171	Valya s Store Shenzhen Yousheng Technology Co.
172	VAZN Sexy Club Two Store Zhangzhou Longwen District Yuncheng Trading Co., Ltd.
173	Venus Love Store

<b>DEFENDANT NO</b>	<b>NAME</b>
174	Veryou Store
175	VG TOWN Large Size Tankini
176	VIEUNSTA Apparels Store
178	whatapp Store
179	Womaiil Store
180	Women Home Store
181	WOWKA Store Shenzhen Yiyoubao Network Technology Co., Ltd.
182	Y2K Woman Clothing Store
183	YAOOERER Store
184	YAOOERYAO Store Guanzhou Guigerian Trading Co., Ltd.
185	YeEr Store
186	YILESS Store
187	YinglingGuo Store
188	You Different Store
189	Your Swimsuit Shop Store
190	YouShow Store Shenzhen Arke Technology Co., Ltd.
191	YouYo Store SHENZHEN JIKA IANG COMPUTER TECHNOLOGY CO., LTD
192	Yueyue Hong 888 Store
193	YUNDONG Store

DEFENDANT NO	NAME
194	ZHAI Store
195	Zhang iuling Store Wuhan game Ying collar Garment Co., Ltd
196	ZJAS MS Clothes Official Store
197	ZJFZML Store Jinyun Chenyu Commodity Co., Ltd.
198	ZYLL Store
199	ZZFASHION Store Fuzhou Wuchu Network Technology Co., Ltd.

(collectively referred to as the “Defendants”).

4. I hereby certify that Plaintiff’s asserted claims for relief in this action involve the intentional, willful infringement for the following federally registered copyright protected image(s) - VA0002379894 (the “Copyright Protected Image”).

5. As alleged in the Complaint, the Defendants have displayed, without authorization, the Copyright Protected Images on the Aliexpress.com online sales platform (the “Platform”) to market and sell knockoff, counterfeit products resembling Plaintiff’s authentic Rotita brand products through their online stores (the “Online Stores”), thereby deceiving public consumers as to the quality, nature, and source of goods being purchased.

6. On October 23, 2024, Plaintiff served the Defendants with its First Set of Requests for Admissions pursuant to Rule 36 of the Federal Rules of Civil Procedure (the “Requests for Admission”). Also included with Plaintiff’s service of the Requests for Admission were Requests for Production of Documents pursuant to Rule 34 of the Federal Rules of Civil Procedure (the “Requests for Production”). A true and correct copy of Plaintiff’s counsel’s service email on

October 23, 2024, which includes copies of the Requests for Admission but has omitted copies of the Requests for Production to streamline this submission, is attached as E A.

7. The Defendants' responses were due on or before November 25, 2024. Defendants failed to respond to Plaintiff's Requests for Admission and its Requests for Production as required. In fact, as of the filing of this Motion, none of the Defendants have responded to Plaintiff's propounded requests for admission or requests for production of documents. Moreover, absolutely no communications have been received from the Defendants concerning Plaintiff's written discovery requests. As such, the Defendants are deemed to have admitted each of the Requests for Admission. *See* Fed.R.Civ.P. 36(a)(3). Quite simply, Defendants have apparently elected to hide behind the shield of the Platform, which has routinely refused to produce sales information, challenged the merits of this Court's TRO and preliminary injunction, and that is well-known to refuse enforcement of default judgment orders entered by United States Federal District Courts

8. Plaintiff elects to seek an award of statutory damages in the amount of \$5,000 per infringed Copyright Protected Image by the Defendants. This requested statutory damage award is justified by the reasonable settlement amounts agreed to by Plaintiff in multiple copyright infringement actions commenced in this judicial district and the statutory damage awards authorized by other Courts in this judicial district, which currently includes those issued by Judge Matthew F. Kennelly (Case No. 1:24-cv-02939, Dkt. No. 154), Judge Jeremy C. Daniel (Case No. 1:24-cv-01652, Dkt. No. 75), Judge Martha M. Pacold (Case No. 1:24-cv-03210, Dkt. No. 100), Judge Kendall (Case No. 1:24-cv-01807, Dkt. No. 93 and Case No. 1:24-cv-03191, Dkt No. 50), and Judge Jenkins (Case No. 1:24-cv-07702, Dkt. No. 41). Plaintiff additionally requests that the award of \$5,000 per infringed Copyright Protected Image be trebled to \$15,000 for each such infringement based on the Defendants admitted willful infringement of said Copyright Protected

Images, which is confirmed and established based upon the Defendants' admitted responses to the Requests for Admission propounded by Plaintiff to which no responses were received. Attached as **E** **B** is a table summarizing the statutory damages sought against the Defendants on a 5,000 per infringement of each Copyright Protected Image with treble enhanced damages sought against each said Defendant for willful infringement.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: January 10, 2025

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (ARDC No. 6299408)

**BAYRAMOGLU LAW OFFICES LLC**

1540 West Warm Springs Road Ste. 100

Henderson, NV 89014

Tel: (702) 462-5973 | Fax: (702) 553-3404

shawnmangano@bayramoglu-legal.com

*Attorneys for Plaintiff*



**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th day of January 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing (the “ECF”) system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third party, AliExpress.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (IL Bar No. 6299408)  
**BAYRAMOGLU LAW OFFICES, LLC**

# **EXHIBIT A**



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**E-SERVICE DISCOVERY REQUESTS: Case No. 1:24-cv-02809; XYZ Corp. v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule "A" Hereto**

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From Elizabeth Cummings <elizabeth@bayramoglu-legal.com>

Date Wed 10/23/2024 7:31 PM

To BLO copyright <copyrightR@bayramoglu-legal.com>

Cc Litigation <litigation@bayramoglu-legal.com>

 2 attachments (770 KB)

20241023 Plaintiff's First Set of RFPs to Defendants [ALIEX2].pdf; 20241023 Plaintiff's First Set of RFAs to Defendants [ALIEX2].pdf;

TO WHOM IT MAY CONCERN:

We represent Plaintiff in the above-referenced case filed in the United States District Court for the Northern District of Illinois, Eastern Division. We are writing because you have been named as a Defendant in this case.

**PLEASE TAKE NOTICE** that you are hereby electronically served Plaintiff's First Set of Requests for Admissions and Plaintiff's First Set of Requests for Production of Documents. **PLEASE TAKE FURTHER NOTICE** that your response to these requests are *due in thirty days*, on or before **November 22, 2024**. FAILURE TO RESPOND may result in the Requests being deemed admitted.

You may also find case related documents at the following [LINK](#).

***Please contact our office at [copyrightR@bayramoglu-legal.com](mailto:copyrightR@bayramoglu-legal.com) immediately to discuss settlement terms and conditions.***

Very truly yours,  
Elizabeth

ELIZABETH  
CUMMINGS, CP

Certified Paralegal

Qualified by the National Association of Legal Assistants to  
provide CP® (certified paralegal) services

1540 West Warm Springs Road, Suite 100,  
Henderson, NV 89014  
(702) 462-5973

[www.bayramoglu-legal.com](http://www.bayramoglu-legal.com)

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Bayramoglu Law

EVERY PERSON WHO  
WALKS THROUGH  
OUR DOOR IS  
IMPORTANT TO US

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED IN SCHEDULE  
“A” HERETO,

Defendants.

Case No.: 1:24-cv-02809-JCD-MV

**PLAINTIFF HONG KONG LEYUZHEN  
TECHNOLOGY CO. LIMITED’S FIRST  
SET OF REQUESTS FOR ADMISSIONS  
TO DEFENDANTS**

Honorable Jeremy C. Daniel  
Magistrate Judge Maria Valdez

Pursuant to Federal Rules of Civil Procedure 36, Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“Plaintiff”), by and through its counsel, Bayramoglu Law Offices LLC, hereby request that Defendants (“Defendants”) in the above-captioned matter admit or deny the information set forth in the following Requests for Admission (the “Requests”). Defendant must respond to these Requests within thirty (30) days after service. Defendant is required to respond individually and separately admit or deny every Request for Admission by serving its responses to Bayramoglu Law Offices, LLC, 1540 West Warm Springs Road, Suite 100, Henderson, Nevada 89014, with a courtesy copy via email to Shawn Mangano at shawnmangano@bayramoglu-legal.com and a courtesy copy to litigation@bayramoglu-legal.com or another location agreed to by the parties. When responding to the Requests, please refer to the Definitions and Instructions that follow:

### **DEFINITIONS**

1. “Action” shall mean Case No. 1:24-cv-02809-JCD-MV pending before the United States District Court for the Northern District of Illinois, Eastern Division.
2. “Communication” means the transmission of information in any form, between two or more persons, including, without limitation, written, oral, or electronic transmissions.
3. “Defendant”, “You”, and/or “Your” shall mean the Schedule “A” Defendant, whether operating through a corporate entity, partnership, association, individually, or otherwise.
4. The “Work” or “Works” shall mean the copyright protected image or images covered by the following Registration Number(s): VA0002379894.
5. “Storefront” shall mean the online storefront or storefronts operated by You on the Alibaba online sales platform.
6. The “Platform” shall mean the Aliexpress online sales platform on which the Storefront was being operated.
7. “Referring to”, “Refer”, “Relate” or “Relating to” means consisting of, referring to, reflecting, concerning, or being in any way logically or factually connected with the matter discussed.
8. “Sales Information” shall mean all sales data relating to any product sold by You that displayed one or more Works on the Storefront, which shall expressly include sales data for all colors, patterns, sizes, and sales identification numbers such as SKUs and ASINs.
9. “TRO” shall mean the Temporary Restraining Order entered in this Action on July 17, 2024 Dkt. No. 23 .
10. These Requests require You to admit or deny based on all information within You knowledge, custody, or control or within the knowledge, custody, or control of Your employees,

predecessors, successors, parents, subsidiaries, divisions, affiliates, partners, joint ventures, brokers, accountants, financial advisors, representatives, and agents or other persons acting on Your behalf, without regard to the physical location of those Document(s).

11. These Requests are continuing in nature. *See* Fed. R. Civ. P. 26(e). With respect to any of the following Requests or portions that Defendant, after answering, acquires additional knowledge or information, Defendant must serve upon Plaintiff amended or supplemental responses.

12. Pursuant to the Federal Rules of Civil Procedure and related, controlling case law, You must preserve or cause to be preserved, all records, Documents, and Electronically Stored Information (including, but not limited to, computer data) related to this Action.

**RE UESTS FOR ADMISSION**

**RE UEST FOR ADMISSION NO. 1:**

Admit that You are not the sole owner of the Storefront.

**RESPONSE NO. 1:**

**RE UEST FOR ADMISSION NO. 2:**

Admit that the Storefront is owned by You.

**RESPONSE NO. 2:**

**RE UEST FOR ADMISSION NO. \_:**

Admit that there are no other owners of the Storefront.

**RESPONSE NO. \_:**

**REQUEST FOR ADMISSION NO. 4:**

Admit that You only operate one Storefront on the Platform.

**RESPONSE NO. 4:**

**REQUEST FOR ADMISSION NO. 5:**

Admit that You acquired a Work owned by Plaintiff without authorization to do so.

**RESPONSE NO. 5:**

**REQUEST FOR ADMISSION NO. 6:**

Admit that You acquired a Work owned by Plaintiff without authorization to do so.

**RESPONSE NO. 6:**

**REQUEST FOR ADMISSION NO. 7:**

Admit the Storefront acquired the Work owned by Plaintiff without authorization to do so.

**RESPONSE NO. 7:**

**REQUEST FOR ADMISSION NO. 8:**

Admit that You do not have a license from Plaintiff to display the Work.

**RESPONSE NO. 8:**

**REQUEST FOR ADMISSION NO. 9:**

Admit the Storefront does not have a license from Plaintiff to display the Work.

**RESPONSE NO. 9:**

**RE UEST FOR ADMISSION NO. 10:**

Admit that You displayed a Work owned by Plaintiff without authorization to do so.

**RESPONSE NO. 10:**

**RE UEST FOR ADMISSION NO. 11:**

Admit the Storefront displayed the Work owned by Plaintiff without authorization to do so.

**RESPONSE NO. 11:**

**RE UEST FOR ADMISSION NO. 12:**

Admit that You displayed a Work owned by Plaintiff without authorization to do so on the Storefront.

**RESPONSE NO. 12:**

**RE UEST FOR ADMISSION NO. 1 :**

Admit that You solicited purchases of certain products associated with the Storefront from members of the public.

**RESPONSE NO. 1 :**

**RE UEST FOR ADMISSION NO. 14:**

Admit that You solicited purchases of certain products associated with the Storefront from members of the public by displaying a Work owned by Plaintiff without authorization to do so.

**RESPONSE NO. 14:**



**RE UEST FOR ADMISSION NO. 15:**

Admit that You secured purchases of certain products associated with the Storefront from members of the public.

**RESPONSE NO. 15:**

**RE UEST FOR ADMISSION NO. 16:**

Admit that You secured purchases of certain products associated with the Storefront from members of the public by displaying a Work owned by Plaintiff without authorization to do so.

**RESPONSE NO. 16:**

**RE UEST FOR ADMISSION NO. 1 :**

Admit You have shipped products to the United States

**RESPONSE NO. 1 :**

**RE UEST FOR ADMISSION NO. 18:**

Admit You have shipped products to the United States that were purchased from the Storefront.

**RESPONSE NO. 18:**

**RE UEST FOR ADMISSION NO. 19:**

Admit that You have shipped products to the United States that were purchases from the Storefront using the unauthorized display of a Work owned by Plaintiff.

**RESPONSE NO. 19:**

**REQUEST FOR ADMISSION NO. 20:**

Admit that You copied the Work from Plaintiff's Website without authorization to do so.

**RESPONSE NO. 20:**

**REQUEST FOR ADMISSION NO. 21:**

Admit that You copied the Work from Plaintiff's Website without a license to do so.

**RESPONSE NO. 21:**

**REQUEST FOR ADMISSION NO. 22:**

Admit that You obtained a copy of the Work from a third-party.

**RESPONSE NO. 22:**

**REQUEST FOR ADMISSION NO. 23:**

Admit that You obtained a copy of the Work from a third-party not authorized by Plaintiff to do so.

**RESPONSE NO. 23:**

**REQUEST FOR ADMISSION NO. 24:**

Admit that You obtained a copy of the Work from a third-party not granted a license by Plaintiff to do so.

**RESPONSE NO. 24:**

**RE UEST FOR ADMISSION NO. 25:**

Admit that You did not inquire whether any third-party providing the Work to You was authorized by Plaintiff to do so.

**RESPONSE NO. 25:**

**RE UEST FOR ADMISSION NO. 26:**

Admit that You did not inquire whether any third-party providing the Work to you was licensed by Plaintiff to do so.

**RESPONSE NO. 26:**

**RE UEST FOR ADMISSION NO. 2 :**

Admit Plaintiff is the owner of the Work.

**RESPONSE NO. 2 :**

**RE UEST FOR ADMISSION NO. 28:**

Admit Plaintiff is the registered owner of the Work with the United States Copyright Office.

**RESPONSE NO. 28:**

**RE UEST FOR ADMISSION NO. 29:**

Admit the Work is the subject of a federal copyright registration by the United States Copyright Office.

**RESPONSE NO. 29:**

**REQUEST FOR ADMISSION NO. 0:**

Admit that You have been accused of other acts of copyright infringement.

**RESPONSE NO. 0:**

**REQUEST FOR ADMISSION NO. 1:**

Admit that You have been accused of other acts of trademark infringement.

**RESPONSE NO. 1:**

**REQUEST FOR ADMISSION NO. 2:**

Admit that You have been Accused of other unfair competition.

**RESPONSE NO. 2:**

**REQUEST FOR ADMISSION NO. 3:**

Admit the Storefront has been accused of other acts of copyright infringement.

**RESPONSE NO. 3:**

**REQUEST FOR ADMISSION NO. 4:**

Admit the Storefront has been accused of other acts of trademark infringement.

**RESPONSE NO. 4:**

**REQUEST FOR ADMISSION NO. 5:**

Admit the Storefront has been accused of other acts of unfair competition.

**RESPONSE NO. 5:**

**RE UEST FOR ADMISSION NO. 6:**

Admit You have been the subject of at least one complaint filed with the Platform aside from this Action.

**RESPONSE NO. 6:**

**RE UEST FOR ADMISSION NO. 7:**

Admit You have been the subject of at least one complaint filed with the Platform for copyright infringement aside from this Action.

**RESPONSE NO. 7:**

**RE UEST FOR ADMISSION NO. 8:**

Admit You have been the subject of at least one complaint filed with the Platform for trademark infringement aside from this Action.

**RESPONSE NO. 8:**

**RE UEST FOR ADMISSION NO. 9:**

Admit You have been the subject of at least one complaint filed with the Platform for unfair competition aside from this Action.

**RESPONSE NO. 9:**

**RE UEST FOR ADMISSION NO. 40:**

Admit that You include the term “Rotita” in the Search Engine Optimization criteria with the Platform for the Storefront.

**RESPONSE NO. 40:**

**RE UEST FOR ADMISSION NO. 41:**

Admit that You include the term “Rotita” in the Search Engine Optimization criteria with the Platform for the Storefront funnel potential customers to the Storefront.

**RESPONSE NO. 41:**

**RE UEST FOR ADMISSION NO. 42:**

Admit that You do not hold any license rights granted by Plaintiff.

**RESPONSE NO. 42:**

**RE UEST FOR ADMISSION NO4 :**

Admit that You have not been granted any authorization by Plaintiff concerning any copyright protected Work owned by Plaintiff.

**RESPONSE NO. 4 :**

**RE UEST FOR ADMISSION NO. 44:**

Admit the Storefront does not hold any license rights granted by Plaintiff.

**RESPONSE NO. 44:**

**RE UEST FOR ADMISSION NO. 45:**

Admit the Storefront has not been granted any authorization by Plaintiff concerning any copyright protected Work owned by Plaintiff.

**RESPONSE NO. 45:**

**RE UEST FOR ADMISSION NO. 46:**

Admit that You did not investigate whether any third-party held any intellectual property rights related to the Work before displaying it on the Storefront.

**RESPONSE NO. 46:**

**RE UEST FOR ADMISSION NO. 4 :**

Admit that You have acted in concert with one or more of the other named Schedule “A” Defendants in this Action to secure one or more digital image that is a Work or Work owned by Plaintiff.

**RESPONSE NO. 4 :**

**RE UEST FOR ADMISSION NO. 48:**

Admit that You have acted in concert with one or more of the other named Schedule “A” Defendants in this Action to sell products on the Platform using one or more digital image that is a Work or Work owned by Plaintiff.

**RESPONSE NO. 48:**

**RE UEST FOR ADMISSION NO. 49:**

Admit that You have acted in concert with the one or more of the other named Schedule “A” Defendants in this Action.

**RESPONSE NO. 49:**

**RE UEST FOR ADMISSION NO. 50:**

Admit that You did not investigate whether any third-party held any federal copyrights registration issued by the United States Copyright Office related to the Work before displaying it on the Storefront.

**RESPONSE NO. 50:**

**RE UEST FOR ADMISSION NO. 51:**

Admit that You did not investigate whether any third-party held any federal trademark registrations issued by the United States Patent and Trademark Office related to the Work before displaying it on the Storefront.

**RESPONSE NO. 51:**

**RE UEST FOR ADMISSION NO. 52:**

Admit that You have sold products through the Storefront to the State of Illinois

**RESPONSE NO. 52:**



**REQUEST FOR ADMISSION NO. 5 :**

Admit that You have sold products through the Storefront using a Work owned by Plaintiff to the State of Illinois.

**RESPONSE NO. 5 :**

Date: October 23, 2024

Respectfully submitted,

By: Shawn A. Mangano  
Shawn A. Mangano, Esq.  
shawnmangano@bayramoglu-legal.com  
**Ba ra o La O ces LLC**  
1540 West Warm Springs Road Ste. 100  
Henderson, NV 89104  
Tel: (702) 462-5973  
Fax: (702) 553-3404  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I, hereby certify that on October 23, 2024, I served the foregoing **PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS TO DEFENDANTS** via electronic mail as provided by the e-commerce platform AliExpress.

By: /s/ Shawn A. Mangano

SHAWN A. MANGANO, ESQ.  
BAYRAMOGLU LAW OFFICES

# **EXHIBIT B**

## I T E T I A A D I F I F I G E M E T F C I G H T A

		A d r E I r	E d r I r T d
1	ALAM Store Shenzhen Fashion Point E-commerce LTD.	\$5,000.00	Total: \$15,000.00
2	001 Factory Store	\$5,000.00	Total: \$15,000.00
3	003 Factory Store	\$5,000.00	Total: \$15,000.00
4	01 Small Fish Store	\$5,000.00	Total: \$15,000.00
5	A Promise Clothes Store	\$5,000.00	Total: \$15,000.00
6	Abandon Red Store Shenzhen Shengxing Fei Technology Co.	\$5,000.00	Total: \$15,000.00
7	ABC BIKINI Store Putian City Valerian Yao Trading Co. Ltd.	\$5,000.00	Total: \$15,000.00
8	Active Fitness Outdoors	\$5,000.00	Total: \$15,000.00
9	Adent Store	\$5,000.00	Total: \$15,000.00
10	Ali May Store	\$5,000.00	Total: \$15,000.00
11	AliClothes Store	\$5,000.00	Total: \$15,000.00
12	AOMEI Global Store Zhongshan Nuoshang Clothing Co. Ltd.	\$5,000.00	Total: \$15,000.00
14	Aring Dropshipping Store SHENZHEN OMEDA HOME CO., LTD	\$5,000.00	Total: \$15,000.00
15	Art Life drop shipping Store	\$5,000.00	Total: \$15,000.00
16	bang boom Store	\$5,000.00	Total: \$15,000.00
17	Beach Fun Swimsuit Store	\$5,000.00	Total: \$15,000.00
18	Beautiful 7 Store	\$5,000.00	Total: \$15,000.00
19	Belleyoo Store	\$5,000.00	Total: \$15,000.00

## I T E M A A D I F I F I G E M E T F C I G H T A

		A d r E I r	E d r I r T d
20	BELOVING Cloths Store	\$5,000.00	Total: \$15,000.00
21	Bertas FashionClothesFactory Store Fuzhou Betas Trading Co., Ltd.	\$5,000.00	Total: \$15,000.00
22	Bling Star Store Guangzhou Beianzhi Trading Co., Ltd	\$5,000.00	Total: \$15,000.00
23	Bluelans Fashion Clothes Store Shenzhen Hengdaqi Network Technology Co., Ltd.	\$5,000.00	Total: \$15,000.00
24	Brown CBC Store	\$5,000.00	Total: \$15,000.00
25	Buy happiness Store	\$5,000.00	Total: \$15,000.00
26	BXG Girl Store	\$5,000.00	Total: \$15,000.00
27	Chacs Store	\$5,000.00	Total: \$15,000.00
28	Chamliforve Africa Clothes Store	\$5,000.00	Total: \$15,000.00
29	Cheerful Kids Life Toy City Store	\$5,000.00	Total: \$15,000.00
30	Chic Beauties	\$5,000.00	Total: \$15,000.00
31	Chunchen DropShipping Store Hefei Chunchen Network Technology Co., Ltd.	\$5,000.00	Total: \$15,000.00
32	Classic Outfit Store	\$5,000.00	Total: \$15,000.00
33	CLOTHE YOUR LIFE Store Shenzhen Huitai San Trading Co., Ltd.	\$5,000.00	Total: \$15,000.00
34	Cure Drop Shipping Store	\$5,000.00	Total: \$15,000.00
35	Divine- Store	\$5,000.00	Total: \$15,000.00
36	DressFashionFactory Store	\$5,000.00	Total: \$15,000.00

## I T E M A A D I F I F I G E M E T F C I G H T A

		A d r E I r	E d r I r T d
37	Dropshipping Choice Store	\$5,000.00	Total: \$15,000.00
38	Dropshipping Shenzhen China Clothes Store	\$5,000.00	Total: \$15,000.00
39	Dropshipping Y2K Store	\$5,000.00	Total: \$15,000.00
40	Duo Le Xi Duo Duo Store	\$5,000.00	Total: \$15,000.00
41	DUTRIEUX Sexy Store Kunming Stone Attribution Thousand Trading Co., Ltd.	\$5,000.00	Total: \$15,000.00
42	Easier for Life Store	\$5,000.00	Total: \$15,000.00
43	Ebuy dropshipping Store	\$5,000.00	Total: \$15,000.00
44	Ebuying online	\$5,000.00	Total: \$15,000.00
45	Ele-choices Store	\$5,000.00	Total: \$15,000.00
46	Elegant Store	\$5,000.00	Total: \$15,000.00
47	Engine City Store	\$5,000.00	Total: \$15,000.00
48	Eternal Esther Store	\$5,000.00	Total: \$15,000.00
49	Everything Possible Store	\$5,000.00	Total: \$15,000.00
50	FAIRY SEASON Store	\$5,000.00	Total: \$15,000.00
51	Fanbety Apparel Store	\$5,000.00	Total: \$15,000.00
52	Fanbety Store	\$5,000.00	Total: \$15,000.00
53	Fancy Clothing Store	\$5,000.00	Total: \$15,000.00
54	Fascination Beauty Store	\$5,000.00	Total: \$15,000.00

## I T E T I A A D I F I F I G E M E T F C I G H T A

		A d r E I r	E d r I r T d
55	Fashion Queen Love Store	\$5,000.00	Total: \$15,000.00
56	Fashion Women Garment	\$5,000.00	Total: \$15,000.00
57	Fashion Women Garment Store	\$5,000.00	Total: \$15,000.00
58	Fashionable Clothes Code Store	\$5,000.00	Total: \$15,000.00
59	Faxion Store	\$5,000.00	Total: \$15,000.00
60	fei Store	\$5,000.00	Total: \$15,000.00
61	Flashe Store	\$5,000.00	Total: \$15,000.00
62	freestlye Store	\$5,000.00	Total: \$15,000.00
63	FX CHAO Store	\$5,000.00	Total: \$15,000.00
64	Gluehwein Clothes Store	\$5,000.00	Total: \$15,000.00
65	GUO SWIMSUIT Store Quanzhou Yunou Trading Co., Ltd.	\$5,000.00	Total: \$15,000.00
66	Heavy Discount Clothes Store	\$5,000.00	Total: \$15,000.00
67	HI RENAISSANCE Store	\$5,000.00	Total: \$15,000.00
68	Hi Sexy Girl Store	\$5,000.00	Total: \$15,000.00
69	HIAVAVA Store Xingcheng Qianyu Garment Factory	\$5,000.00	Total: \$15,000.00
70	HUAJUANER DISCOUNT Store Zhenping Huajuan Trading Co., Ltd.	\$5,000.00	Total: \$15,000.00
71	IMDVC Official Store	\$5,000.00	Total: \$15,000.00

## I T E T I A A D I F I F I G E M E T F C I G H T A

		A d r E I r	E d r I r T d
72	JomooC Store Shenzhen Songmei Lian Technology Co., Ltd.	\$5,000.00	Total: \$15,000.00
73	JUCLEO Official Store	\$5,000.00	Total: \$15,000.00
74	Kawaii Clothes Wholesale Store	\$5,000.00	Total: \$15,000.00
75	KongClothes Store	\$5,000.00	Total: \$15,000.00
76	Ladifasin Store Twenty-three (Shenzhen) Electronic Commerce Co., Ltd.	\$5,000.00	Total: \$15,000.00
77	Lily Cheap Clothing Store	\$5,000.00	Total: \$15,000.00
78	Lipswag Store New Situ Technology (Shenzhen) Co., Ltd.	\$5,000.00	Total: \$15,000.00
79	lipswag Swimwear Store	\$5,000.00	Total: \$15,000.00
80	LLYY beach Store	\$5,000.00	Total: \$15,000.00
81	Loive Store	\$5,000.00	Total: \$15,000.00
82	Loving secret store	\$5,000.00	Total: \$15,000.00
83	LS-fullhouse Store	\$5,000.00	Total: \$15,000.00
84	Lslaica women's Store	\$5,000.00	Total: \$15,000.00
85	Luckys Sports Store	\$5,000.00	Total: \$15,000.00
86	lucylady Store	\$5,000.00	Total: \$15,000.00
87	LUO XIAO HEI Store	\$5,000.00	Total: \$15,000.00
88	MAFIRRY Sexy Store	\$5,000.00	Total: \$15,000.00
89	Mandy Mandy Store	\$5,000.00	Total: \$15,000.00



## I T E T I A A D I F I F I G E M E T F C I G H T A

		A d r E I r	E d r I r T d
90	Mandylandy Apparel Store	\$5,000.00	Total: \$15,000.00
91	Mandylandy Trend Store Store	\$5,000.00	Total: \$15,000.00
92	Margotladys Store	\$5,000.00	Total: \$15,000.00
93	Men s Shirt Hoodie Store Store	\$5,000.00	Total: \$15,000.00
94	Mi Mi Store	\$5,000.00	Total: \$15,000.00
95	MICAH2FIRST Store	\$5,000.00	Total: \$15,000.00
96	Minimalist kk Store	\$5,000.00	Total: \$15,000.00
97	Missyou Muses Store	\$5,000.00	Total: \$15,000.00
98	Mr.22 Store	\$5,000.00	Total: \$15,000.00
99	MSLL Store	\$5,000.00	Total: \$15,000.00
100	MUSBEMA Store	\$5,000.00	Total: \$15,000.00
101	My clothes Store	\$5,000.00	Total: \$15,000.00
102	Ocsplus Boutique Store	\$5,000.00	Total: \$15,000.00
103	OFS 49 Store Shangrao Ofei Shang Technology Co., Ltd.	\$5,000.00	Total: \$15,000.00
104	One And Only Fishion Store	\$5,000.00	Total: \$15,000.00
105	Oufisun 55 Store	\$5,000.00	Total: \$15,000.00
107	Personalization Clothing	\$5,000.00	Total: \$15,000.00
108	PETROVIC Ali-fashion	\$5,000.00	Total: \$15,000.00

**I T E M A A D I F I F I G E M E T F C I G H T A**

		<b>A d r E I r</b>	<b>E d r I r T d</b>
109	PLSIF Official Store	\$5,000.00	Total: \$15,000.00
110	PLUS SIZE BIKINI Store	\$5,000.00	Total: \$15,000.00
111	Pretty Clothes Store	\$5,000.00	Total: \$15,000.00
112	Princess Of Butterfly Store	\$5,000.00	Total: \$15,000.00
113	Rachel's Clothes Store	\$5,000.00	Total: \$15,000.00
114	Rainbowlike2021 Store	\$5,000.00	Total: \$15,000.00
115	RE Wearing Store	\$5,000.00	Total: \$15,000.00
116	Rose Apparel Store	\$5,000.00	Total: \$15,000.00
117	RyansJewelry Store	\$5,000.00	Total: \$15,000.00
118	RyansWatch Store	\$5,000.00	Total: \$15,000.00
119	SEABBBOT Store	\$5,000.00	Total: \$15,000.00
120	See you 99 Store	\$5,000.00	Total: \$15,000.00
121	sexy barbie Store	\$5,000.00	Total: \$15,000.00
122	SEXY SWIMSUIT SHOP Store	\$5,000.00	Total: \$15,000.00
123	Shop1102089618 Store	\$5,000.00	Total: \$15,000.00
124	Shop1102112377 Store	\$5,000.00	Total: \$15,000.00
125	Shop1102372800 Store	\$5,000.00	Total: \$15,000.00
126	Shop1102474073 Store	\$5,000.00	Total: \$15,000.00

**I T E M A A D I F I F I G E M E T F C I G H T A**

		<b>A d r E I r</b>	<b>E d r I r T d</b>
127	Shop1102602785 Store	\$5,000.00	Total: \$15,000.00
128	Shop1102694969 Store	\$5,000.00	Total: \$15,000.00
129	Shop1102802496 Store	\$5,000.00	Total: \$15,000.00
130	Shop1102856073 Store	\$5,000.00	Total: \$15,000.00
131	Shop1102951053 Store	\$5,000.00	Total: \$15,000.00
132	Shop1102964364 Store	\$5,000.00	Total: \$15,000.00
133	Shop1102994011 Store	\$5,000.00	Total: \$15,000.00
134	Shop1103009240 Store	\$5,000.00	Total: \$15,000.00
135	Shop1103199553 Store	\$5,000.00	Total: \$15,000.00
136	Shop1103207479 Store	\$5,000.00	Total: \$15,000.00
137	Shop1103276252 Store	\$5,000.00	Total: \$15,000.00
138	Shop1103304670 Store	\$5,000.00	Total: \$15,000.00
139	Shop1103322979 Store	\$5,000.00	Total: \$15,000.00
140	Shop1103326345 Store	\$5,000.00	Total: \$15,000.00
141	Shop1103471271 Store	\$5,000.00	Total: \$15,000.00
142	Shop110--ljl-yy1 Store	\$5,000.00	Total: \$15,000.00
143	Shop4808172 Store	\$5,000.00	Total: \$15,000.00
144	Shop4923029 Store	\$5,000.00	Total: \$15,000.00

## I T E T I A A D I F I F I G E M E T F C I G H T A

		A d r E I r	E d r I r T d
145	Shop5790089 Store	\$5,000.00	Total: \$15,000.00
146	Shop5800592 Store	\$5,000.00	Total: \$15,000.00
147	Shop5886157 Store Ouyas (Shenzhen) Industrial Co., Ltd.	\$5,000.00	Total: \$15,000.00
148	Shop900254458 Store	\$5,000.00	Total: \$15,000.00
149	Shop911251404 Store	\$5,000.00	Total: \$15,000.00
150	Showyer Clothes Store	\$5,000.00	Total: \$15,000.00
151	Sicilian girl Store	\$5,000.00	Total: \$15,000.00
152	SIMOVIA Official Store	\$5,000.00	Total: \$15,000.00
153	Simptoo Store	\$5,000.00	Total: \$15,000.00
154	Soochic Store	\$5,000.00	Total: \$15,000.00
155	sssochic Store	\$5,000.00	Total: \$15,000.00
156	StyleDesign Women Store	\$5,000.00	Total: \$15,000.00
157	Sukienki Official Store	\$5,000.00	Total: \$15,000.00
158	Sumi Lavi Apparel Store	\$5,000.00	Total: \$15,000.00
159	Sumilavi Dropshipping Store	\$5,000.00	Total: \$15,000.00
160	Sunfree Store	\$5,000.00	Total: \$15,000.00
161	Swallow Women Store	\$5,000.00	Total: \$15,000.00
162	TMALE Store Shenzhen Doha Forest Technology Co., Ltd	\$5,000.00	Total: \$15,000.00

## I T E M A A D I F I F I G E M E T F C I G H T A

		A d r E I r	E d r I r T d
163	To Be Male Universe	\$5,000.00	Total: \$15,000.00
164	To Be Male Universe Clothing Store	\$5,000.00	Total: \$15,000.00
165	To Be The First Store Shenzhen Xin Core Network Technology Co., Ltd.	\$5,000.00	Total: \$15,000.00
166	Tsukimi003 Store Wuhan Zhuzhi Mei Trading Co., Ltd	\$5,000.00	Total: \$15,000.00
167	Two Per Thousand Official	\$5,000.00	Total: \$15,000.00
168	Two Per Thousand Official Store	\$5,000.00	Total: \$15,000.00
169	Urban Women Store	\$5,000.00	Total: \$15,000.00
170	VACATION BIKINI Store	\$5,000.00	Total: \$15,000.00
171	Valya's Store Shenzhen Yousheng Technology Co.	\$5,000.00	Total: \$15,000.00
172	VAZN Sexy Club Two Store Zhangzhou Longwen District Yuncheng Trading Co., Ltd.	\$5,000.00	Total: \$15,000.00
173	Venus Love Store	\$5,000.00	Total: \$15,000.00
174	Veryou Store	\$5,000.00	Total: \$15,000.00
175	VG TOWN Large Size Tankini	\$5,000.00	Total: \$15,000.00
176	VIEUNSTA Apparels Store	\$5,000.00	Total: \$15,000.00
178	whatapp Store	\$5,000.00	Total: \$15,000.00
179	Womaill Store	\$5,000.00	Total: \$15,000.00
180	Women Home Store	\$5,000.00	Total: \$15,000.00

**I T E M A A D I F I F I G E M E T F C I G H T A**

		<b>A d r E s s</b>	<b>E s t i m a t e d</b>
181	WOWKA Store Shenzhen Yiyoubao Network Technology Co., Ltd.	\$5,000.00	Total: \$15,000.00
182	Y2K Woman Clothing Store	\$5,000.00	Total: \$15,000.00
183	YAOOERER Store	\$5,000.00	Total: \$15,000.00
184	YAOOERYAO Store Guangzhou Guigerian Trading Co., Ltd.	\$5,000.00	Total: \$15,000.00
185	YeEr Store	\$5,000.00	Total: \$15,000.00
186	YILESS Store	\$5,000.00	Total: \$15,000.00
187	YinglingGuo Store	\$5,000.00	Total: \$15,000.00
188	You Different Store	\$5,000.00	Total: \$15,000.00
189	Your Swimsuit Shop Store	\$5,000.00	Total: \$15,000.00
190	YouShow Store Shenzhen Arke Technology Co., Ltd.	\$5,000.00	Total: \$15,000.00
191	YouYo Store SHENZHEN JIKAXIANG COMPUTER TECHNOLOGY CO., LTD	\$5,000.00	Total: \$15,000.00
192	Yueyue Hong 888 Store	\$5,000.00	Total: \$15,000.00
193	YUNDONG Store	\$5,000.00	Total: \$15,000.00
194	ZHAI Store	\$5,000.00	Total: \$15,000.00
195	Zhang Xiuling Store Wuhan game Ying collar Garment Co., Ltd	\$5,000.00	Total: \$15,000.00
196	ZJASXMS Clothes Official Store	\$5,000.00	Total: \$15,000.00
197	ZJFZML Store Jinyun Chenyu Commodity Co., Ltd.	\$5,000.00	Total: \$15,000.00

**I T E M   A A D D I T I O N A L   I F I G U R E   T O   F O L L O W   I G H T   A**

		<b>A d d i t i o n a l</b>	<b>E x p e n d i t u r e</b>
198	ZYLL Store	\$5,000.00	Total: \$15,000.00
199	ZZFASHION Store Fuzhou Wuchu Network Technology Co., Ltd.	\$5,000.00	Total: \$15,000.00
		<b>T O T A L</b>	