

**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-01807-VMK-GAF

Honorable Virginia M. Kendall

Magistrate Gabriel A. Fuentes

**PLAINTIFF’S MOTION FOR ENTRY OF CLERK’S DEFAULT AGAINST THE NON-
APPEARING DEFENDANTS IDENTIFIED IN SCHEDULE “A”**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“Plaintiff”) hereby moves for entry of clerk’s default pursuant to Federal Rule of Civil Procedure 55(a) (the “Motion”) against certain non-appearing, through the filing of an answer or otherwise responsive pleading, (the “Defaulting Defendants”) identified in Schedule “A”. Plaintiff has specifically excluded from its request for entry of default those Defendants that have settled the claims asserted against them and those Defendants that have formally appeared through counsel of record in this action. A listing of non-appearing Schedule “A” Defendants subject to Plaintiff’s request for entry of default, together with those Schedule “A” Defendants that are excluded from this request, is attached as Exhibit “1” to the supporting Declaration of Shawn A. Mangano (the “Mangano Decl.”) submitted concurrently with this Motion.

DATED: June 24, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano
Shawn A. Mangano (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 24th day of June 2024, 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 system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email and by posting the filing on a URL contained on our website <https://blointernetenforcement.com/>, and distributed to ecommerce platform, Alibaba.com.

By: /s/ Shawn A. Mangano
Shawn A. Mangano (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

**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-01807-VMK-GAF

Honorable Virginia M. Kendall

Magistrate Gabriel A. Fuentes

**PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT AGAINST THE NON-APPEARING
DEFENDANTS IDENTIFIED IN SCHEDULE “A”**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”) submits the following memorandum in support of its request for entry of default (the “Motion”) pursuant to Federal Rule of Civil Procedure 55(a) (“Rule 55(a)”) against certain non-appearing, through the filing of an answer or otherwise responsive pleading, (the “Defaulting Defendants”) identified in Schedule “A”. Plaintiff has specifically excluded from its request for entry of default those Defendants that have settled the claims asserted against them and those Defendants that have formally appeared through counsel of record in this action. A listing of non-appearing Schedule “A” Defendants subject to Plaintiff’s request for entry of default, together with those Schedule “A” Defendants that are excluded from this request, is attached as Exhibit “1” to the supporting Declaration of Shawn A. Mangano (the “Mangano Decl.”) submitted concurrently with this Motion.

I. INTRODUCTION

Plaintiff's request for entry of default is straightforward, the Court authorized electronic service of process on the named Schedule "A" Defendants via email as part of issuing a Temporary Restraining Order (the "TRO") in this matter on March 25, 2024. [Dkt. No. 15.] Plaintiff promptly effectuated service on all named Schedule "A" Defendants and a Return of Service was filed attesting to service having been completed on April 28, 2024. [Dkt. No. 32 at 2.]

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A) ("Rule 12(a)(1)(A)"), the Defaulting Defendants had twenty-one (21) days to answer or otherwise respond to Plaintiff's Complaint in this action. As of the filing of this Motion, fifty (50) days have expired since electronic service was effectuated on the Schedule "A" Defendants, which includes the Defaulting Defendants that are the subject of Plaintiff's Motion. (Mangano Decl. ¶ 5.) To date, none of the Defaulting Defendants have answered or otherwise responded to Plaintiff's Complaint. (*Id.*) Accordingly, the Clerk of the Court is compelled to enter default pursuant to Rule 55(a) against the Defaulting Defendants.

II. 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 Defendants since each of the Defendants 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 addition to the foregoing, the Court has determined that it can properly exercise specific personal jurisdiction over the Schedule "A" Defendants, which includes the Defaulting Defendants, in issuing the TRO requested by Plaintiff on March 25, 2024. [Dkt. No. 15.] Accordingly, it is unquestionable that the Defaulting Defendants are subject to personal jurisdiction in this action.

B. PLAINTIFF HAS MET THE REQUIREMENTS FOR ENTRY OF DEFAULT UNDER RULE 55(a)

Pursuant to Rule 55(a), "when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default." Fed. R. Civ. P. 55(a). Plaintiff clearly meets these requirements.

On March 4, 2024, Plaintiff filed its Complaint in this action. [Dkt. Nos. 1, 11.] The Defendants were properly served on April 28, 2024. [Dkt. No. 32 at 2.] As such, the Defaulting Defendants had twenty-one (21) days to answer or otherwise respond to Plaintiff's complaint pursuant to Rule 12(a)(1)(A). As of the filing of this Motion, fifty (50) days have expired since electronic service was effectuated on the Schedule "A" Defendants, which includes the Defaulting Defendants that are the subject of Plaintiff's Motion. (Mangano Decl. ¶ 5.) To date, none of the Defaulting Defendants have answered or otherwise responded to Plaintiff's Complaint. (*Id.*) Accordingly, the Clerk of the Court is compelled to enter default pursuant to Rule 55(a) against the Defaulting Defendants.

III. CONCLUSION

Based on the foregoing, Plaintiff respectfully requests that the Clerk of the Court enter default against each of the Defaulting Defendants pursuant to Rule 55(a).

DATED: June 24, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano
Shawn A. Mangano (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 24th day of June 2024, 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 system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email and by posting the filing on a URL contained on our website <https://blointernetenforcement.com/>, and distributed to ecommerce platform, Alibaba.com.

By: /s/ Shawn A. Mangano
Shawn A. Mangano (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

**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-01807-VMK

Honorable Virginia M. Kendall

Magistrate Gabriel A. Fuentes

**DECLARATION OF SHAWN A. MANGANO IN SUPPORT OF PLAINTIFF'S MOTION
FOR ENTRY OF DEFAULT AGAINST NON-APPEARING DEFENDANTS IDENTIFIED
IN SCHEDULE "A"**

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

1. 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.

2. I make this declaration in support of Plaintiff's Motion for Entry of Clerk's Default against the Defendants Identified in Schedule "A" (the "Motion"). The Motion seeks entry of default against those named Defendants that have neither appeared in this action nor reached a settlement with Plaintiff over the company's asserted claims for relief (the "Defaulting Defendants"). According, the Defaulting Defendants do not include named Schedule "A" Defendants that have settled with Plaintiff or Defendants that have entered formal appearances through counsel in this

case. Attached hereto as Exhibit “1” is a true and correct copy of a list of the Defaulting Defendants and the excluded other Defendants not subject to Plaintiff’s request for entry of default.

3. 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 one of the attorneys for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”). I make this declaration from my matters within my own knowledge unless stated otherwise.

4. I hereby certify that the Defaulting Defendants have failed to file an answer or other responsive pleading within twenty-one (21) days after being served with the Summons and Complaint in this action as required by Federal Rule of Civil Procedure 12(a)(1)(A).

5. Specifically, all Schedule “A” Defendants were served with copies of the Summons and Complaint via electronic service authorized by the Court on April 28, 2024, which is reflected in the Return of Summons filed in this case. [Dkt. No. 32 at 2.] As of the filing of this Motion, fifty (50) days have expired since electronic service was effectuated on the Schedule “A” Defendants, which includes the Defaulting Defendants that are the subject of Plaintiff’s Motion. None of the Defaulting Defendants have answered or otherwise responded to Plaintiff’s Complaint in this action.

6. My office investigated the infringing activities of the Defaulting Defendants, including attempting to identify their contact information. Our investigation confirmed that the Defaulting Defendants are primarily domiciled in Asia and, more particularly, in either the People's Republic of China or territory under that government's control. As such, I am informed and believe that none of the Defaulting Defendants are active-duty members of any branch of the United States armed services.

I declare under penalty of perjury under the laws of the United States of America the foregoing is true and correct.

Executed on June 24, 2024, in Las Vegas, Nevada.

By: /s/ Shawn A. Mangano
SHAWN A. MANGANO, ESQ.

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of June 2024, 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 system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email and by posting the filing on a URL contained on our website <https://blointernetenforcement.com/>, and distributed to ecommerce platform, Alibaba.com.

By: /s/ Shawn A. Mangano
Shawn A. Mangano (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

EXHIBIT 1

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
1	Guangzhou Baiyun District Ka Ya Te Garment Factory
2	alibaba (zhongguo)wangluojishuyouxiangongsi
3	All Things International Trade (Guangzhou) Co., Ltd.
5	Beijing Boningsai Trading Co., Ltd.
6	Changsha Ox Arts & Crafts Co., Ltd.
7	Changsha Zhezhe Clothing Co., Ltd.
9	Changzhou Swimshark Garments Co., Ltd.
11	Chongqing Gooney Information Technology Co.,ltd.
12	Chongqing Xuesheng Clothing Ltd., Company
13	Dadao Gonghe (Shenzhen) Garment Co., Ltd.
14	Dalian Tianzige Dress Design Co., Ltd.
16	Dongguan Boxiang Garment Co., Ltd.
18	Dongguan Chengwang Trading Co., Ltd.
19	Dongguan Chuangdian Garment Co., Ltd.
21	Dongguan City Jingyu Apparel Co., Ltd.
22	Dongguan Dafeng Garment Co., Ltd.
23	Dongguan Dalang Muzhifeng Trade Department
24	Dongguan Dali Clothing Co., Ltd.
25	Dongguan Feitong Garment Co., Ltd.
26	Dongguan Fnjia Knitwear Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
27	DONGGUAN FUXING KNITTING GARMENTS CO.,LTD
28	Dongguan Gina Import & Export Co., Ltd
29	Dongguan Ginwen Garment Co., Ltd
30	Dongguan Gongying Garment Co., Ltd.
33	Dongguan Humen As Fashion Factory
34	Dongguan Humen Limenglang Garment Factory
35	Dongguan Humen Three Brothers Fashion Factory
36	Dongguan Humen Yihao Clothing Co., Ltd.
38	Dongguan Jinghong Foreign Trade Clothing Co., Ltd.
39	Dongguan Jzj Garment Co., Ltd.
40	Dongguan Kaqi Garment Co., Ltd.
41	Dongguan Lancai Garment Co., Ltd.
42	Dongguan Liziyuan Clothing Co., Ltd.
43	Dongguan Manni Dress Co., Ltd.
44	Dongguan Meiya Apparel Co., Ltd.
45	Dongguan Miao Sheng Clothing Co., Ltd.
46	Dongguan Mingge Knitting Garment Co., Ltd.
47	Dongguan Qian Yong Clothing Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
48	Dongguan Qianxi Technology Co., Ltd.
49	Dongguan Qishun Clothing Co., Ltd.
50	Dongguan Ruichi Fashion Co., Ltd.
51	Dongguan Sanniu Clothing Co., Ltd
52	Dongguan Shangcai Clothing Co., Ltd.
53	Dongguan Shengde Clothing Co., Ltd.
54	Dongguan Shenjie Clothing Co., Ltd
55	Dongguan Shinny Import & Export Ltd.
56	Dongguan Sky & Star Fashion Co., Ltd.
57	Dongguan Sun Denean Clothing Co., Ltd.
58	Dongguan VF Garment Co., Ltd.
59	Dongguan Xibolin Garment Co., Ltd
60	Dongguan Xiyi Clothing Co., Ltd.
61	Dongguan Yalen Clothing Co., Ltd.
63	Dongguan Yinshang Clothing Co., Ltd.
64	Dongguan Yishang Garment Co., Ltd.
66	Dongguan YiYang Clothing Co., Ltd
68	Dongguan Yunya Fashion Co., Ltd.
69	Dongguan Zhongyi Clothing Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
70	Foshan Abelin Clothing Co.,Ltd
71	Foshan Faoumei Garment Co., Ltd
72	Foshan Mujin Clothing Co., Ltd
73	Fujian Century Yeung Pok Import And Export Co., Ltd.
74	Fujian Rosinandi E-Commerce Co., Ltd.
75	Fujian Xinhenghong Trading Co., Ltd.
76	Fushun Nxcaps Clothing Company Limited
77	Fuzhou Kuajin International Trading Co., Ltd.
78	Fuzhou Qianbeiluo Trading Co., Ltd
79	Fuzhou Reliable E-Commerce Co., Ltd.
80	Fuzhou Yiqingya E-Commerce Co., Ltd
81	Ganzhou Jianghuchuan Trade Co., Ltd.
83	Guangdong Chengxi Trade Co., Ltd.
85	Guangdong Qian Lu Garment Co., Ltd.
86	Guangxi Lingzhi Trading Co., Ltd.
87	Guangxi Pingxiang Honghai Technology Co.,ltd
88	Guangxi Xiongxiang Technology Co., Ltd

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
89	Guangzhou Aifuli Clothing Co., Ltd.
90	Guangzhou Aiyishang Clothing Co., Ltd.
91	Guangzhou Baige Clothing Co., Ltd
92	Guangzhou Baiyun District Ka Ya Te Garment Factory
93	Guangzhou Blue Star Clothing Co., Ltd.
94	Guangzhou Bluewings Technology Co., Ltd.
95	Guangzhou Chu Feiya Trade Co., Ltd.
97	Guangzhou Domin Company Limited
98	Guangzhou Duojin Clothing Co., Ltd
99	Guangzhou Elsa Clothing Co., Ltd.
100	Guangzhou Evawanna Shoes And Clothes Co., Ltd.
101	Guangzhou Feifeng Trade Co., Ltd.
102	Guangzhou Fiona Clothing Co., Ltd
103	Guangzhou Forward E-Commerce Co., Ltd.
104	Guangzhou Fugui Clothing Co., Ltd.
105	Guangzhou Gaia Garments Co., Ltd
106	Guangzhou Gaosheng Garment Co., Ltd
107	Guangzhou Gui Tong Trading Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
108	Guangzhou Guruisi Clothing Co., Ltd.
109	Guangzhou Hongyun Clothing Co., Ltd
110	Guangzhou Huiya Textile Co., Ltd.
111	Guangzhou iDesign Technology Co., Ltd
112	Guangzhou I-Feeling Clothing Co., Ltd.
113	Guangzhou Ifree Garment Co., Ltd.
115	Guangzhou Jiayan Trading Service Co., Ltd.
117	Guangzhou Joye Accessories Co., Ltd.
119	Guangzhou Junli Apparel Co., Ltd
120	Guangzhou Junli Import And Export Co., Ltd.
121	Guangzhou Lang buwan clothing Co.Ltd
122	Guangzhou Langbuwan Clothing Co., Ltd.
123	Guangzhou Lanyiqi Trading Co., Ltd.
125	Guangzhou Lianmeng Garment Co., Ltd.
126	Guangzhou Linda Garments Co., Ltd
128	Guangzhou Lixing Electronic Technology Co., Ltd.
129	Guangzhou Lusili Clothing Co., Ltd.
130	Guangzhou Meisen Garment Co., Ltd.
131	Guangzhou Mengxintong Trading Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
132	Guangzhou Milky Way Jewelry Limited
133	Guangzhou Minmin Industrial Holding Co., Ltd.
134	Guangzhou Muhaban Trading Co., Ltd.
135	Guangzhou New Apparel Trade Company Limited
136	Guangzhou Ouerman Garment Co., Ltd
137	Guangzhou Outpace Sportswear Co., Ltd.
139	Guangzhou Prettysteps Garment Co., Ltd.
140	Guangzhou Pzf Garment Co., Ltd.
141	Guangzhou Qiaoyi Clothing Co., Ltd
142	Guangzhou Qintai Garment Company Ltd.
143	Guangzhou Ri Gong Yi Zu Information Technology Co., Ltd.
144	Guangzhou Rongdi Clothing Co., Ltd.
146	Guangzhou Samwestart Technology Co., Ltd.
147	Guangzhou Sehe Apparel Co., Ltd
148	Guangzhou Shangsi Fashion Co., Ltd.
150	Guangzhou Shiwai Foreign Trade Clothing Co., Ltd
151	Guangzhou Starry Clothing Ltd

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
152	Guangzhou Suwo Trading Co., Ltd.
153	Guangzhou Taoyan Trading Co., Ltd.
154	Guangzhou Twoway Fashion Industry Co., Ltd.
155	Guangzhou Van Yit Garment Co., Ltd.
156	Guangzhou Vegas Clothing Co., Ltd
157	Guangzhou Vigour International Trade Co., Ltd.
158	Guangzhou Wintex Apparel Co., Ltd.
159	Guangzhou Xinchu Trading Co., Ltd.
160	Guangzhou Xinlilai Apparel Industry Co., Ltd.
161	Guangzhou Yifany Technology Co., Ltd.
162	Guangzhou Yilisha Garment Co., Ltd.
163	Guangzhou Yingjiaqi Clothing Co.,Ltd
164	Guangzhou Yinshi Apprael Co., Ltd.
165	Guangzhou Yixin Trading Co., Ltd.
166	Guangzhou Youqi Trading Co., Ltd
168	Guangzhou Yue Lu En Trading Co., Ltd.
169	Guangzhou Zhanhui International Supply Chain Management Co., Ltd.
170	Guangzhou Zhuo Fanming Trading Co., Ltd.
172	Guangzhou Zhuoya Clothing Firm
173	Guangzhou Zichen Clothing Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
174	Guangzhou Ziqi International Trading Ltd
175	Guangzhou Ziya Network Technology Co., Ltd.
176	Guigang Tengguan Clothing Co., Ltd.
177	Hainan Abgirl Industrial Co., Ltd.
179	Hangzhou Fashion Oxygen Trade Co., Limited
180	Hangzhou Huanwei Trading Co., Ltd.
181	Hangzhou Jiuxing Clothing Co., Ltd.
182	Hangzhou Manbu Clothing Co., Ltd
183	Hangzhou Yongyuan Technology Co., Ltd
185	Hebei Ji Mi Clothing Co., Ltd.
186	Hebei Kang Sheng Yuan Sports Goods Co., Ltd
187	Hefei Fengsida Trading Co., Ltd
188	Hefei Yaohai Zeyo Garment&accessory Firm
189	Henan Huanwei E-Business Co., Ltd.
190	Henan Songkun Import And Export Ltd
191	Henan Songzhi Import And Export Co., Ltd.
192	Henan Xiaokangning Import And Export Co., Ltd.
193	Huizhou Qian Qian Industrial Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
194	Huizhou Xinmeisheng Trading Co., Ltd. No link
195	Hunan Chuanglan Supply Chain Management Co., Ltd.
196	Hunan Saiqun Network Co., Ltd.
197	Huzhou Jindou Network Technology Co., Ltd
198	iMike Mart Supply (Huizhou) Co., Ltd
199	Jianghua May F.m. Garment Co., Ltd.
200	Jiangxi Zhaoye International Trade Co., Ltd.
201	Jiangxi Zhilin Imp&Exp Co., Ltd.
202	Jiangyin GET Garments Co., Ltd.
203	Jiangyin Polman Knitting Garment Co., Ltd.
204	Jiaxing Coolsun Garment Co., Ltd.
205	Jinhua Agata Trading Co., Ltd..
206	Jinhua Taijun Household Products Co., Ltd.
207	Jinhua Younamei Trading Co., Ltd.
208	Jinjiang Liuming Trading Co., Ltd.
211	KIMSHEIN LIMITED.
212	Lanzhou Limanying Trading Co., Ltd.
213	Lianze (guangzhou) Foreign Trade Clothing Co. Ltd.
214	Liaoning Yituo Garment Co., Ltd

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
215	Licheng District Wangyao Trade Firm
216	Longyan Yuqixuan Garments Co., Ltd.
217	Love Double Apparel (Guangdong) Co., Ltd.
218	Luze (shenzhen) Trading Co., Ltd.
219	Maqvob Apparel Group Ltd.
220	MGOO GARMENT MANUFACTURING COMPANY LIMITED
221	Nanchang Zhongdianhong Trading Co., Ltd.
222	Nantong Loyalty Import And Export Co., Ltd
223	Nanyang Ruitao Trading Co., Ltd.
224	Nc Isa Industry And Trade Company
225	NINGBO C.CLOTHING IMPORT & EXPORT CO., LTD.
226	Ningbo Xingqi Import And Export Co., Ltd.
227	No.8 Shop (beijing) International Trade Co., Ltd.
228	Number One Industrial Co., Ltd.
229	One Dollar International Import & Export (Guangzhou) Co., Ltd.
230	Pingdingshan Sunn Technology Co., Ltd.
231	Qingdao Baohuiyang International Trade Co., Ltd.
232	Quanzhou Aorui Trading Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
233	Quanzhou Chengzheng Trading Co., Ltd
234	Quanzhou Fangcheng Trading Co., Ltd,
235	Quanzhou Fotron Trading Co., Ltd.
236	Quanzhou Global Lover Garments Co., Ltd.
237	Quanzhou Huasong Information Technology Co., Ltd
238	Quanzhou Jessica Clothing Co., Ltd.
239	Quanzhou Jinglimei Trading Co., Ltd.
242	Quanzhou Mengbaozi Clothing Co., Ltd.
243	Quanzhou Mengmao Trading Co., Ltd.
244	Quanzhou Minshan Import & Export Trading Co.
245	Quanzhou Minshan Import And Export Trading Co., Ltd.
246	Quanzhou Minzhen Clothing Co., Ltd.
247	Quanzhou No Resistance Trading Co., Ltd.
248	Quanzhou Onen Ecommerce Co., Ltd
249	Quanzhou Qingsong Trading Co., Ltd.
250	Quanzhou Ruimeixin Trading Co., Ltd.
251	Quanzhou Shanshan Trading Co., Ltd

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
252	Quanzhou Stamgon Trading Co., Ltd.
253	Quanzhou Sunwear Enterprise Co., Ltd.
254	Quanzhou Tianyi Clothing Co., Ltd
255	Quanzhou Walson Imp & Exp Co., Ltd
256	Quanzhou Wensidi Trading Co., Ltd
257	Quanzhou Xuyou Technology Co., Ltd
258	Quanzhou Yetai Trading Co., Ltd.
259	Quanzhou Yibiao Sexy Lingerie Co., Ltd.
260	Quanzhou Yingyi Trade Company Limited
261	Quanzhou Zhukuanghong Garments Co., Ltd
262	Quanzhou Zichen Clothing Co., Ltd.
263	Shaanxi Huiyi Core Goods Industry Co., Ltd.
265	Shanghai Powertec Industry Co., Ltd.
266	Shanghai Qianyi Trading Co., Ltd.
267	Shanghai Rejie Industrial Co., Ltd.
268	Shanghai Rosefinch Trading Co., Ltd.
269	Shanghai Yixixi Industry Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
270	Shanghai Youti Clothing Co., Ltd.
271	Shanghai Yubin Trading Co., Ltd.
272	Shangrao Oufeishan Technology Co., Ltd.
273	Shantou Chaorong Clothing Co., Ltd.
274	Shantou Chaoyang District Guiyu Pengxing Knitting Factory
276	Shantou Hongli Clothing Co., Ltd.
277	Shantou Linsee Knitwear Co., Ltd.
278	Shanxi Ashley Bio-Tech Co., Ltd.
279	Shanxi Jingbiao E-Commerce Co., Ltd.
280	Shanxi Titan Biotechnology Co., Ltd.
281	Sharee (shenzhen) Trading Co., Ltd
282	Sheng Zhou Huijia Garment Co., Ltd.
283	Shenglong Swimming (huludao) Garment Trading Co., Ltd.
284	Shenyang Wayboth Network Technology Co., Ltd.
285	Shenyang Willian Network Technology Co., Ltd.
287	Shenzhen Changyuan Electronic Commerce Co., Ltd.
288	Shenzhen Chunyu Electronic Technology Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
289	Shenzhen Fendi Jewelry Co., Ltd.
290	Shenzhen Hongxia Technology Co., Ltd.
291	Shenzhen Innoview Technology Co., Ltd.
292	Shenzhen Jie Shi Ni Industrial Co., Ltd
294	Shenzhen Longgang District Qixuan Baby Underwear Factory (individual Business)
295	Shenzhen Lucky Top Garments Co., Ltd
296	Shenzhen Messa Garments Co., Ltd.
297	Shenzhen Miumiu Jewelry Co., Ltd.
298	Shenzhen Momeishi Clothing Co., Ltd.
299	Shenzhen Msg Technology Co., Ltd.
300	Shenzhen New Greatwall Technology Co., Ltd.
301	Shenzhen Ou Fashion Imp. & Exp. Co., Ltd.
302	Shenzhen Pinchen Technology Co., Ltd.
303	Shenzhen Qiu Tai International Media Co., Ltd.
304	Shenzhen Siweiming Garment Trading Co., Ltd.
305	Shenzhen Tengwei Clothing Co., Ltd
306	Shenzhen Wallis E-Commerce Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
307	Shenzhen Yannifashion Commerce Co., Ltd
308	Shenzhen Yuanzheng Energy Technology Co., Ltd.
309	Shenzhen ZFK Trade Co., Ltd.
310	Shishi Baishiwei Garment Trading Co., Ltd.
311	Shishi Shiaiying Garment Co., Ltd
312	Sichuan Eco Garments Co., Ltd
313	Sichuan Ronghui Jiuzhou Trading Co., Ltd.
314	Suizhou Huaxi Trade Co., Ltd.
315	Suzhou Qianxin Trade Co., Ltd
316	Tg Cup Industry Technology (hangzhou) Co., Ltd.
317	VIOLETA INVESTMENTS CO., LIMITED
318	Weihai Grand Legend Garment Co., Ltd.
319	Wuhan UYI Feng Technology Co., LTD
320	Xiamen Aicai Apparel Co., Ltd.
321	Xiamen Aimeee Garment Co., Ltd.
322	Xiamen Aiyiyang Trading Co., Ltd.
323	Xiamen Bristter Sports Products Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
324	Xiamen Cenxing Import And Export Co., Ltd.
325	Xiamen Chaofeyang Trading Co., Ltd
326	Xiamen Chuangyijia Trading Co., Ltd.
327	Xiamen Duosheng Trading Co., Ltd
328	Xiamen Fengway Imp. & Exp. Co., Ltd.
329	Xiamen Gifter Import And Export Co., Ltd.
330	Xiamen Golden Bays Industrial Co., Limited
331	Xiamen Honore Supply Chain Management Co., Ltd.
332	Xiamen Jianyi Xinhong Trading Co., Ltd.
333	Xiamen Jiyuxiang Garment Co., Ltd.
334	Xiamen Little Yumi Trade Co., Ltd.
335	Xiamen M S G Garment Co., Ltd.
336	Xiamen Meibile Import And Export Co., Ltd.
337	Xiamen Moen Global Trading Co., Ltd.
338	Xiamen Moglovers Technology Co., Ltd.
339	Xiamen New Trend Trading Co., Ltd.
340	Xiamen Ningning Qi E-Commerce Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
341	Xiamen OCS Trade Co., Ltd
342	Xiamen Pop Gloria International Trade Co., Ltd
343	Xiamen Qinchang Apparel Co., Ltd.
344	Xiamen Simian E-Business Co., Ltd.
345	Xiamen Sipaisi Trading Co., Ltd
346	Xiamen Sky Pigeon Network Technology Co., Ltd.
347	Xiamen Sourceman Import And Export Co., Ltd.
348	Xiamen Starlights Supply Chain Co., Ltd.
350	Xiamen Tongsiyuan Trading Co., Ltd.
351	Xiamen Unique Pretty Textile Clothing Co.,Ltd
352	Xiamen Weimiduo Industrial Co., Ltd.
353	Xiamen Xinyi Import And Export Co., Ltd.
354	Xiamen Yangfan Trading Co., Ltd
355	Xiamen Yingleihong Electronic Commerce Co., Ltd.
356	Xingcheng Besali Sporting Goods Co., Ltd.
357	Xinxiang Jues Department Store Co., Ltd
358	Xingcheng Dongshengda Garment Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
359	Xinxiang Shiyuan Trading Co., Ltd.
360	Xinxing County Adana Clothing Co., Ltd
361	Yamon (hangzhou) International Trade Co., Ltd
362	Yiwu Beiwo Trading Co., Ltd.
363	Yiwu Changjie Trading Co., Ltd.
364	Yiwu Chenxia E-Commerce Firm
365	Yiwu Chenyan Jewelry Co., Ltd
366	Yiwu City Chaoqi Garment Co., Ltd.
367	Yiwu City Chenhao Trading Co., Ltd.
368	Yiwu City Domy Garment Co., Ltd.
369	Yiwu Dajie Import And Export Co., Ltd.
370	Yiwu Dingxin E-Commerce Co.,ltd.
371	Yiwu Duoniu Import And Export Co., Ltd
373	Yiwu Fengyao Garment Co., Ltd.
375	Yiwu Huanhuan Garments Co., Ltd
377	Yiwu Huiyu E-Commerce Firm
378	Yiwu Kaiding Electronic Commerce Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
379	Yiwu Kejia Import And Export Co., Ltd.
380	Yiwu Lizhiyi Apparel Co., Ltd.
382	Yiwu Lucheng E-Commerce Co., Lt
383	Yiwu Maining Trading Co., Ltd.
384	Yiwu Mingchang Fashion Co., Ltd.
385	Yiwu Mingqi Trading Co., Ltd.
386	Yiwu Moco Import & Export Co., Ltd.
387	Yiwu Motty Garment Co., Ltd.
388	Yiwu Mozi Trade Company Limited
389	Yiwu Nuoyi Imp & Exp Co., Ltd
390	Yiwu Om Import And Export Co., Ltd.
391	Yiwu Orange Sui Import And Export Company Limited
392	Yiwu Peng Rui Jewelry Accessories Co., Ltd
393	Yiwu Pengrun Apparel Co., Ltd
394	Yiwu Qiji Trading Co., Ltd
395	Yiwu Ruiyi Home Supplies Co., Ltd
396	Yiwu S&y Trading Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
397	Yiwu Saichen Import And Export Co., Ltd.
398	Yiwu Sangor Import And Export Co., Ltd.
399	Yiwu Sangtu Import And Export Co., Ltd.
400	Yiwu Sili Import And Export Co., Ltd.
401	Yiwu Tixu E-Business Firm
402	Yiwu Wenshuo Import And Export Co., Ltd
403	Yiwu Xiangjia Clothing Co., Ltd.
404	Yiwu Xiaokan Electronic Commerce Firm
406	Yiwu Xinxin Import And Export Co., Ltd.
407	Yiwu Xinyu Garment Co., Ltd
408	Yiwu Xuanxin Trading Co., Ltd.
409	Yiwu Yahe E-Commerce Ltd.
410	Yiwu Yayan Trading Co., Ltd.
411	Yiwu Yili Trading Firm
412	Yiwu Yinglei Trading Co., Ltd.
413	Yiwu Yinpeng Healthy&Sport Article Co., Ltd.
414	Yiwu Yize Clothing Co., Ltd.

Non-appearing Schedule A Defendants

Defendant No.	Seller's Name
415	Yiwu Youlike Electronic Commerce Co., Ltd.
416	Yuanhong Garment Accessory Co., Ltd.
417	Yuanyang County Hengsen Department Store Co., Ltd.
418	Yulin Luchuan Yisui Clothing Co., Ltd.
419	Zhangzhou Daimeng Clothing Co., Ltd.
420	Zhaoqing City Gaoyao District Tianyi Clothing Sales Co., Ltd.
421	Zhejiang Bsofter Textile Co., Ltd
422	Zhejiang G Top Clothing Co., Ltd.
423	Zhengzhou Senyo Trading Co., Ltd.
424	Zhongshan Coolswim Garment Co., Ltd.
425	Zhongshan Nuoshang Garment Co., Ltd.

Plaintiff does not seek an entry of clerk's default against the following defendants at this time.

Defendant No.	Seller's Name	Defendant Status
8	Changzhou Melee Trading Co., Ltd.	DISMISSED
17	Dongguan Chaoyuan Clothing Co., Ltd	DISMISSED
32	Dongguan Haohoo Clothing Co., Ltd	DISMISSED
65	Dongguan Yisheng Knitting Clothing Co., Ltd.	DISMISSED
96	Guangzhou Derun Trade Limited	DISMISSED
116	Guangzhou Jiuyuan Clothing Co., Ltd	DISMISSED
118	Guangzhou Joyord Sportswear Co., Ltd.	DISMISSED

Non-appearing Schedule A Defendants

127	Guangzhou Liule Garments Co., Ltd.	DISMISSED
145	Guangzhou Ruixi Clothing Design Co., Ltd	DISMISSED
171	Guangzhou Zhuosi Clothing Co., Ltd	DISMISSED
374	Yiwu Hankai Import And Export Co., Ltd	DISMISSED
138	Guangzhou Pretty Fashion Ltd.	In Discussions
149	Guangzhou Shining Clothing Co., Ltd.	In Discussions
4	Anhui Spring Trade Co., Ltd	Appeared through Counsel
10	Chengdu Jingdianmei Clothing Co., Ltd.	Appeared through Counsel
15	Dongguan Aotu Trading Co., Ltd.	Appeared through Counsel
20	Dongguan Chuangyu Knitting Co., Ltd.	Appeared through Counsel
31	Dongguan Han Deng Long Garment Co., Ltd.	Appeared through Counsel
37	Dongguan Jieli Apparel Co., Ltd.	Appeared through Counsel
62	Dongguan Yijinxiu Clothing Co., Ltd.	Appeared through Counsel
67	Dongguan YSYS Original Design Fashion Co., Ltd.	Appeared through Counsel
82	Gelin Garment(Shijiazhuang) Corp.,Ltd.	Appeared through Counsel
84	Guangdong Lianyi Textile Co., Ltd.	Appeared through Counsel
114	Guangzhou J Shen Clothing Co., Ltd.	Appeared through Counsel
124	Guangzhou Le Yong Sports Goods Co., Ltd	Appeared through Counsel
167	Guangzhou Yuanfeng Textile Technology Co., Ltd.	Appeared through Counsel
178	Hangzhou Fanou Jewelry Co., Ltd.	Appeared through Counsel
184	HC International Trade (chengdu) Co., Ltd.	Appeared through Counsel
209	Jinjiang Qicaihu Garments Weaving Co., Ltd.	Appeared through Counsel
240	Quanzhou Langhong Trading Co., Ltd.	Appeared through Counsel
241	Quanzhou Licheng District Huachuang Clothing Firm	Appeared through Counsel
264	Shanghai Luyuan Industrial Co., Ltd.	Appeared through Counsel
275	Shantou City Xupeng Clothing Industrial Co., Ltd.	Appeared through Counsel
286	Shenzhen Baiyicai Fashion Co., Ltd	Appeared through Counsel
293	Shenzhen Lin Ge Lei Clothing Co., Ltd.	Appeared through Counsel
349	Xiamen Tengqiao Clothes Co., Ltd.	Appeared through Counsel
372	Yiwu Fangxin Trading Co., Ltd.	Appeared through Counsel
376	Yiwu Huiyi Trade Co., Ltd	Appeared through Counsel
381	Yiwu Lucai Trading Co., Ltd	Appeared through Counsel
405	Yiwu Xingzhong Trading Company Limited	Appeared through Counsel
426	Guangzhou Mixinni Clothing Co., Ltd.	Appeared through Counsel
427	Shantou Chenghai District Yimei Garment Factory	Appeared through Counsel