

**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-01547-ARW-JC**

**Honorable Judge Andrea R. Wood**

**Magistrate Jeffrey Cole**

**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: December 11, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Bar No. 6299408)

**BAYRAMOGLU LAW OFFICES LLC**

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Henderson, NV 89014

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shawnmangano@bayramoglu-legal.com

*Attorneys for Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of December 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, eBay.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (Bar No. 6299408)  
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*Attorneys for Plaintiff*

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Defendants.

**Case No. 1:24-cv-01547-ARW-JC**

**Honorable Judge Andrea R. Wood**

**Magistrate Jeffrey Cole**

**PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF  
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, 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, which expressly includes those Defendants that have sought or been granted extension of time to response to the operative Complaint (the “Defaulting Defendants”). A listing of non-appearing Schedule “A” Defaulting 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.”).

## **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 July 31, 2024. [Dkt. No. 29.] Plaintiff promptly effectuated service on all named Schedule “A” Defendants and a Return of Service was filed attesting to service having been completed on August 13, 2024. [Dkt. No. 32.] As set forth in the docket entry for the Return of Service, a response to Plaintiff’s operative Complaint was due on or before September 3, 2024. [*Id.*]

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, approximately one hundred twenty (120) 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. 23 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. No. 23 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 on July 31, 2024. [Dkt. No. 29.] Moreover, the Court additionally issued a Preliminary Injunction on August 28, 2024, further solidifying this determination. [Dkt. No. 41.] 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 June 28, 2024, Plaintiff filed its First Amended Complaint (the "Operative Complaint") in this action. [Dkt. No. 23.] The Defendants were properly served with the Operative Complaint, TRO, all supporting documents via electronic service on August 13, 2024. [Dkt. No. 32] 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, over one hundred twenty (120) 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: December 11, 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*

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PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED IN  
SCHEDULE "A" HERETO,

Defendants.

**Case No.: 1:24-cv-01547-ARW**

**Honorable Andrea R. Wood**

**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 August 13, 2024, which is reflected in the Return of Summons filed in this case. [Dkt. No. 32.] As of the filing of this Motion, one hundred twenty (120) 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 identified 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 December 11, 2024, in Las Vegas, Nevada.

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

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of December 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, eBay.

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*Attorneys for Plaintiff*

# Exhibit 1

**HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED v.**  
**The Partnerships and Unincorporated Associations Identified on Schedule "A" -1547**

<b>Plaintiff Requests Clerk's Default Against the Following 148 Non-appearing Defendants</b>	
<b>Δ No.</b>	<b>Seller's Name</b>
1	applaudmissView profile
2	areaquite
3	arearoman
4	arewere-37
5	babyzeal
6	beautyrose-uk
8	chang-9711
9	Clothes Dreamland aka Godvehicle
11	day9330
13	dingxi5
14	drea6677
15	dreamyhouse888
17	eagover22rk
18	eingtill27rk
21	fivestarshopping
22	foreverhome88
23	Fqz7zonkx
24	frdroadd
25	frirising
28	Generalfox Official
29	GM07
32	HSymmind
33	huashixin
34	in.marry
35	jakobautobest
38	junhu-1910
39	junesock3js
41	King-9527

**HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED v.**  
**The Partnerships and Unincorporated Associations Identified on Schedule "A" -1547**

<b>Plaintiff Requests Clerk's Default Against the Following 148 Non-appearing Defendants</b>	
<b>Δ No.</b>	<b>Seller's Name</b>
42	koodyy
43	Lanm Tool
45	lilia_3329
47	lintao
48	lly_7419
49	longgu_45
51	lyshu81
54	maoming8
56	Minke23mk
61	Nttasty12nt
62	nvvictory12nv
63	ochgoodway
64	Paieasy Official
65	PLUM73PRO
66	questeasy
67	quickyoun
68	ratidee
70	salessgoods
71	samess07rk
72	sevencolorslife
74	shunbor
75	summer432
76	sus-136064
77	Takemetoyou
79	thel5045

**HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED v.**  
**The Partnerships and Unincorporated Associations Identified on Schedule "A" -1547**

<b>Plaintiff Requests Clerk's Default Against the Following 148 Non-appearing Defendants</b>	
<b>Δ No.</b>	<b>Seller's Name</b>
<b>80</b>	weyiqi
<b>81</b>	worldicon
<b>82</b>	xixu88y
<b>83</b>	xyli-007
<b>86</b>	yes244
<b>87</b>	yie-25
<b>90</b>	znustore
<b>91</b>	ZZhug520
<b>92</b>	adafaa
<b>93</b>	Allen s-stone
<b>94</b>	angulzhe
<b>95</b>	ayuniu658
<b>96</b>	bownes111
<b>97</b>	changlan5
<b>98</b>	cil_169
<b>99</b>	colsew
<b>100</b>	DD.DIY.BEADS
<b>101</b>	dzdl_31
<b>102</b>	EDC world store/zhaoyi9572
<b>103</b>	fefeaas2 shop
<b>106</b>	fufu8873
<b>107</b>	gclleahis
<b>108</b>	hanhe654
<b>109</b>	hanyanye shop

**HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED v.**  
**The Partnerships and Unincorporated Associations Identified on Schedule "A" -1547**

<b>Plaintiff Requests Clerk's Default Against the Following 148 Non-appearing Defendants</b>	
<b>Δ No.</b>	<b>Seller's Name</b>
<b>110</b>	hello20200928 shop
<b>111</b>	if-you-need-DIY
<b>112</b>	if-you-need-watch
<b>113</b>	James-and-Smith
<b>114</b>	jellycabin
<b>115</b>	jewelery_home888
<b>116</b>	jianbiaastore
<b>118</b>	jngunlai
<b>119</b>	kaai776
<b>120</b>	kevinlee468 shop
<b>123</b>	lb2020lbnb shop
<b>125</b>	Linda-and-Betty
<b>126</b>	llk212 shop
<b>127</b>	luck-time
<b>128</b>	mmaylay
<b>130</b>	msmsmsd
<b>131</b>	mwangg3k
<b>132</b>	mwangky9
<b>133</b>	ninieed
<b>134</b>	pinch_2341
<b>135</b>	poiumn
<b>136</b>	qzhouruihan
<b>137</b>	ralumm
<b>138</b>	robinett1234



**HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED v.**  
**The Partnerships and Unincorporated Associations Identified on Schedule "A" -1547**

<b>Plaintiff Requests Clerk's Default Against the Following 148 Non-appearing Defendants</b>	
<b>Δ No.</b>	<b>Seller's Name</b>
139	s8665s shop
142	shijie2023
145	swtinf-47
146	tolili7
147	ttyttes shop
148	vk55825 shop
149	waxxcd
150	welcome_to_order shop
151	wernette123
153	wujiwsw shop
156	xgad335
157	xiao1xiao1 shop
158	xiaoj4302
159	xiaoxiaobai288 shop
160	xiaozhi2020 shop
161	xinshop
162	xlz895
163	xxdxx2 shop
164	yandee
165	yidihi
166	yiqp33
167	yngdgg

**HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED v.**  
**The Partnerships and Unincorporated Associations Identified on Schedule "A" -1547**

<b>Plaintiff Requests Clerk's Default Against the Following 148 Non-appearing Defendants</b>	
<b>Δ No.</b>	<b>Seller's Name</b>
168	zhaokp18
169	zhongbiaoltd shop
170	zhongbiaomaoyi.ltd shop
174	mifitu
175	newlife1848
176	qazxc6
177	rebern
178	shwa520109
180	wuying130
181	yananlssqian
183	ainnee35
184	cryptall
188	givend
190	huanliu369
191	kafeng66
193	lovesh159
194	lvllan1989
195	mingsun123
196	ochilight
201	serret8888
203	Summer2020
204	sunny278311
206	Yoloday
207	zhan8432
208	zjz145

**HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED v.**  
**The Partnerships and Unincorporated Associations Identified on Schedule "A" -1547**

<b>28 Defendants Currently Excluded from Plaintiff's Request for Clerk's Default</b>		
<b>No.</b>	<b>Seller's Name</b>	<b>Appeared though Counsel or Pro se</b>
7	boxue_68	Appeared through Counsel Christopher Keleher
10	cnstore88	Appeared through Counsel Christopher Keleher
16	dumin-88	Appeared through Counsel Christopher Keleher
19	fantastic good shop	Appeared through Counsel Christopher Keleher
20	Fashionclothing88	Appeared through Counsel Christopher Keleher
26	fuh_11	Appeared through Counsel Christopher Keleher
27	fuh-40	Appeared through Counsel Christopher Keleher
30	guiq45	Appeared through Counsel Christopher Keleher
31	hequ6-13	Appeared through Counsel Christopher Keleher
36	jiaozhu_0	Appeared through Counsel Christopher Keleher
40	kelu 4663	Appeared through Counsel Christopher Keleher
44	Large discount Shop	Appeared through Counsel Christopher Keleher
46	liming_438	Appeared through Counsel Christopher Keleher
50	luoshu-6296	Appeared through Counsel Christopher Keleher
52	maisonvetement	Appeared through Counsel Christopher Keleher
53	maiyata-23	Appeared through Counsel Christopher Keleher
55	mengd_27	Appeared through Counsel Christopher Keleher
57	money fighting	Appeared through Counsel Christopher Keleher
58	moshang_11	Appeared through Counsel Christopher Keleher
59	muguan-1383View profile	Appeared through Counsel Christopher Keleher
60	nangua233	Appeared through Counsel Christopher Keleher
69	richer-w-29	Appeared through Counsel Christopher Keleher
73	sho3988	Appeared through Counsel Christopher Keleher
84	yaduan-98	Appeared through Counsel Christopher Keleher
85	yuxiao_8095	Appeared through Counsel Christopher Keleher
88	yuxin-77	Appeared through Counsel Christopher Keleher
89	zhawa_73	Appeared through Counsel Christopher Keleher
173	jiny_4924	Appeared through Counsel Christopher Keleher