

**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**

**Honorable Jeremy C. Daniel  
Magistrate Maria Valdez**

**PLAINTIFF’S STATEMENT OF NON-OPPOSITION TO  
MOTION FOR SUMMARY JUDGMENT**

COMES NOW, Plaintiff Hong Kong Leyuzhen Technology Co., Ltd., (“Plaintiff”) by and through its attorney of record, Bayramoglu Law Offices LLC, and submits a statement of non-opposition to Plaintiff’s Motion for Summary Judgment Pursuant to FRCP 56 against the identified Schedule “A” Defendants (the “Defendants”) (the “Motion”).

On December 12, 2024, this Court entered a minute order stating: “Plaintiff’s dispositive motion is due on or before 1/10/2025; responses are due on or before 1/24/2025; any reply is due on or before 1/31/2025. Court will rule by mail.” [Dkt. 40]. On January 10, 2025, Plaintiff timely filed its Motion for Summary Judgment [Dkt. 42]. Consequently, Defendants did not file any response on or before January 24, 2025, nor by the time of this filing. Based on the lack of response by any of the Defendants, Plaintiff submits this statement of non-opposition to its Motion for Summary Judgment.

DATED: January 31, 2025

Respectfully submitted,

By: /s/ Joseph W. Droter

Joseph W. Droter (ARDC 6329630)

**BAYRAMOGLU LAW OFFICES LLC**

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31st 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 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 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.

DATED: January 31, 2025

Respectfully submitted,

By: /s/ Joseph W. Droter  
Joseph W. Droter (ARDC 6329630)  
**BAYRAMOGLU LAW OFFICES LLC**