

**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-03210-MMP-SMF

Honorable Martha M. Pacold

Magistrate Sheila M. Finnegan

**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: August 21, 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 21st day of August 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 blointernetenforcement.com, and distributed to ecommerce platform, Amazon.

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**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 May 8, 2024. [Dkt. No. 20]. Plaintiff promptly effectuated service on all named Schedule "A" Defendants and a Return of Service was filed attesting to service having been completed on May 17, 2024. [Dkt. No. 25].

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, ninety-six (96) 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, 8 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, 8 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 May 8, 2024. [Dkt. No. 20]. 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 April 22, 2024, Plaintiff filed its Complaint in this action. [Dkt. Nos. 1 and 8.] The Defendants were properly served on May 17, 2024. [Dkt. No. 25] 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, ninety-six (96) 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: August 21, 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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IDENTIFIED IN SCHEDULE "A" HERETO,

Defendants.

Case No.: 1:24-cv-03210-MMP-SMF

Honorable Martha M. Pacold

Magistrate Sheila M. Finnegan

**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). Served on May 17, 2024 and Answer was due June 7, 2024.

5. Specifically, all Schedule “A” Defendants were served with copies of the Summons and Complaint via electronic service authorized by the Court on May 17, 2024, which is reflected in the Return of Summons filed in this case. [Dkt. No. 25]. As of the filing of this Motion, ninety-six (96) 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 remaining forty-two (42) 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 August 21, 2024, in Las Vegas, Nevada.

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

CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of August 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, Amazon.

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shawnmangano@bayramoglu-legal.com
Attorneys for Plaintiff

EXHIBIT 1

42 Non-appearing Defendants Listed on Schedule A

Defendant No.	Seller's Name
1	Akivide SueJonan
2	Bewellan Wuzhens
4	DIOB huanxingkuajing
5	Dninmim Shuang.L
6	DONGCY ZhuangHuangWuZ
7	ECDAHICC yuchang-e
8	FloHua  Made in China and 7-14 Days Delivery.Women's Bikini Sets
10	Generic Aihuah
12	Generic Lingli-S
19	Generic QINGMEN 7-15 Tage kommen an
22	GILIOS anyanghangzhenshangm
25	HCJKDU
26	HXSZWJJ
28	Lewey LEWISH
29	LOMDEM fantasone
30	Lsydnfow Captain Direct
32	N/P taianxianhongxiufuzhuangdian
35	Onsoyours Sungood Fashion

42 Non-appearing Defendants Listed on Schedule A

Defendant No.	Seller's Name
38	SCOMIN taiandejukejiyouxiang
39	SIUBICH anruioo
48	HUITKMM
55	ColorYan guangzhoushiwushengpijuyou xiangongsi
59	eczipvz eczipvz warehouse clearance
60	FABROX shileduoshengwuk
68	GREEVC SPLENDID SHINE
78	Oudemi Danswen
80	RCJOLLZ 高新区岭川商贸部
81	Ruixinxue huixin Fashion
83	SHOWONSKY
85	STKOOBQ Smilvy
89	VSERETLOON lingliufushijingpindian
94	Bebiullo bebiullo-Apparel
95	Beverly Store Etily
98	CDZL shihongrong shop shihongrong
99	DUOBEY ZJDDDDJQZ-US
113	OLEMEK QingYU

42 Non-appearing Defendants Listed on Schedule A

Defendant No.	Seller's Name
116	Pretifulce Xiart-5-15 Days Standard Shipping
117	Qiribati Guohe Store
118	RYTEJFES-Store Piobiou52 Versand 7-15 Tage
122	TIAFORD MyLifeGetingbest
123	TRENIS Wenmuriyongpinbaihuo
127	ViYW Kexdaaf

All Defendants that have appeared in this case have resolved all underlying claims with Plaintiff.

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Magistrate Sheila M. Finnegan

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DEFENDANTS IDENTIFIED IN SCHEDULE “A”**

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I. INTRODUCTION

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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, ninety-six (96) 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, 8 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, 8 at 2-3]; *see also*

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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 April 22, 2024, Plaintiff filed its Complaint in this action. [Dkt. Nos. 1 and 8.] The Defendants were properly served on May 17, 2024. [Dkt. No. 25] 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, ninety-six (96) 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: August 21, 2024

Respectfully submitted,

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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). Served on May 17, 2024 and Answer was due June 7, 2024.

5. Specifically, all Schedule “A” Defendants were served with copies of the Summons and Complaint via electronic service authorized by the Court on May 17, 2024, which is reflected in the Return of Summons filed in this case. [Dkt. No. 25]. As of the filing of this Motion, ninety-six (96) 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 remaining forty-two (42) 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 August 21, 2024, in Las Vegas, Nevada.

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

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Attorneys for Plaintiff

EXHIBIT 1

42 Non-appearing Defendants Listed on Schedule A

Defendant No.	Seller's Name
1	Akivide SueJonan
2	Bewellan Wuzhens
4	DIOB huanxingkuajing
5	Dninmim Shuang.L
6	DONGCY ZhuangHuangWuZ
7	ECDAHICC yuchang-e
8	FloHua  Made in China and 7-14 Days Delivery.Women's Bikini Sets
10	Generic Aihuah
12	Generic Lingli-S
19	Generic QINGMEN 7-15 Tage kommen an
22	GILIOS anyanghangzhenshangm
25	HCJKDU
26	HXSZWJJ
28	Lewey LEWISH
29	LOMDEM fantasone
30	Lsydnfow Captain Direct
32	N/P taianxianhongxiufuzhuangdian
35	Onsoyours Sungood Fashion

42 Non-appearing Defendants Listed on Schedule A

Defendant No.	Seller's Name
38	SCOMIN taiandejukejiyouxiang
39	SIUBICH anruioo
48	HUITKMM
55	ColorYan guangzhoushiwushengpijuyou xiangongsi
59	eczipvz eczipvz warehouse clearance
60	FABROX shileduoshengwuk
68	GREEVC SPLENDID SHINE
78	Oudemi Danswen
80	RCJOLLZ 高新区岭川商贸部
81	Ruixinxue huixin Fashion
83	SHOWONSKY
85	STKOOBQ Smilvy
89	VSERETLOON lingliufushijingpindian
94	Bebiullo bebiullo-Apparel
95	Beverly Store Etily
98	CDZL shihongrong shop shihongrong
99	DUOBEY ZJDDDDJQZ-US
113	OLEMEK QingYU

42 Non-appearing Defendants Listed on Schedule A

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116	Pretifulce Xiart-5-15 Days Standard Shipping
117	Qiribati Guohe Store
118	RYTEJFES-Store Piobiou52 Versand 7-15 Tage
122	TIAFORD MyLifeGetingbest
123	TRENIS Wenmuriyongpinbaihuo
127	ViYW Kexdaaf

All Defendants that have appeared in this case have resolved all underlying claims with Plaintiff.