

**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-02825-EEB

**HONORABLE ELAINE E. BUCKLO**

HEARING DATE: December 12, 2024

HEARING TIME: 9:45 AM CT

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AGAINST  
THE NON-APPEARING DEFENDANTS IDENTIFIED IN SCHEDULE "A"**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff") hereby moves for entry of 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 5, 2024

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 5th 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 each of the Defaulting Defendants’ websites.

By: /s/ Shawn A. Mangano

Shawn A. Mangano (ARDC 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  
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-02825-EEB

**HONORABLE ELAINE E. BUCKLO**

HEARING DATE: December 12, 2024  
HEARING TIME: 9:45 AM CT

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF’S MOTION  
FOR ENTRY OF CLERK’S 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 July 18, 2024. [Dkt. No. 21.] Plaintiff effectuated service on all named Schedule "A" Defendants and a Return of Service was filed attesting to service having been completed on August 6, 2024. [Dkt. No. 31 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. Specifically, the Defaulting Defendants had until August 27, 2024 to answer or otherwise respond to Plaintiff's Complaint. [Dkt. No. 31.] As of the filing of this Motion, one hundred and twenty-one (121) 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. 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 8, 2024, Plaintiff filed its Complaint in this action. [Dkt. No. 1.] The Defendants were properly served on August 6, 2024. [Dkt. No. 31 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), which expired on August 27, 2024. [Dkt. No. 31.] As of the filing of this Motion, one hundred and twenty-one (121) 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 5, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (ARDC 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 5th 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 each of the Defaulting Defendants’ independent websites.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (ARDC 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](mailto:shawnmangano@bayramoglu-legal.com)

*Attorneys for Plaintiff*

**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-02825-EEB**

**HONORABLE ELAINE E. BUCKLO**

HEARING DATE: December 12, 2024

HEARING TIME: 9:45 AM CT

**DECLARATION OF SHAWN A. MANGANO IN SUPPORT OF PLAINTIFF'S  
MOTION FOR ENTRY OF CLERK'S 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 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"). Accordingly, 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 6, 2024, which is reflected in the Return of Summons filed in this case. [Dkt. No. 31 at 2.] As of the filing of this Motion, one hundred and twenty-one (121) 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 December 5, 2024, in Las Vegas, Nevada.

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



**CERTIFICATE OF SERVICE**

I hereby certify that on the 5th 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 each of the Defaulting Defendants’ independent websites.

By: /s/ Shawn A. Mangano

Shawn A. Mangano (ARDC 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](mailto:shawnmangano@bayramoglu-legal.com)

*Attorneys for Plaintiff*

# **EXHIBIT 1**

**[13] NON-APPEARING DEFENDANTS LISTED ON SCHEDULE A**

<b>Defendant No.</b>	<b>Seller's Name Link Seller's Website</b>
5	<a href="https://www.shopemeryrose.com">https://www.shopemeryrose.com</a>
14	<a href="https://www.ncocon.com">https://www.ncocon.com</a>
17	<a href="https://shopsampeel.com">https://shopsampeel.com</a>
19	<a href="http://www.justfashionnow.com">www.justfashionnow.com</a>
21	<a href="https://www.bellelily.com">https://www.bellelily.com</a>
29	<a href="https://www.alelly.net">https://www.alelly.net</a>
35	<a href="https://www.gracequeens.com">https://www.gracequeens.com</a>
36	<a href="https://www.yuluosha.com">https://www.yuluosha.com</a>
37	<a href="https://www.chictrendy.co.uk">https://www.chictrendy.co.uk</a>
49	<a href="https://uquid.com">https://uquid.com</a> [England]
51	<a href="https://amaioofficial.com">https://amaioofficial.com</a>
81	<a href="https://papsou.ht">https://papsou.ht</a>
82	<a href="https://marimarshop.com">https://marimarshop.com</a>