

**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-03191-VMK-GAF**

Honorable Chief Judge Virginia M. Kendall  
Magistrate Gabriel A. Fuentes

HEARING DATE: January 14, 2025  
HEARING TIME: 9:30 A.M.  
COURTROOM: 2541

**MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST THE IDENTIFIED  
DEFAULTED SCHEDULE “A” DEFENDANTS PURSUANT TO FRCP 55(b)(2)**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”) hereby moves for entry of Default Judgment (the “Motion”) pursuant to Federal Rule of Civil Procedure 55(b)(2) (“Rule 55(b)(2)”) against the identified one hundred and sixty-two (162) Schedule “A” Defendants (the “Defaulted Defendants”), which have been separately listed in Exhibit “1” to the accompanying Declaration of Shawn A. Mangano, Esq. (the “Mangano Decl.”). Plaintiff’s Motion is made and based upon the supporting Memorandum of Law, the Mangano Declaration, the Declaration of Liangjie Li (the “Li Decl.”), the papers and pleadings on file in this action, and any argument of counsel the Court may entertain.

DATED: January 6, 2025

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (IL Bar No. 6299408)

**BAYRAMOGLU LAW OFFICES LLC**

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th 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. 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.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (Il Bar No. 6299408)

No.	Seller	Seller's Contact Information
1	<b>AiClothes Store</b> <b>Fuzhou Huijia Real Estate Agency Co., Ltd.</b> Member ID: cn1543412942ncdm Shop ID: 1101854726	n18559789751@163.com
2	<b>AILSIN Store and Shop910458077 Store</b> <b>Shenzhen Aoersheng Technology Co., Ltd</b> Member ID: cn1530005853nmvf Shop ID: 1101522401	597543925@qq.com
3	<b>Aprmhisyl Girl Store and Aprmhisyl Official Store</b> <b>Hefei Yan Yao Trading ZCo., Ltd</b> Member ID: cn1520072688xpyc Shop ID: 1101241718 Member ID: cn1524128933deyb Shop ID: 1101419628	3559744802@qq.com 2163845712@qq.com
4	<b>ASHIOFU Official Store</b> <b>Chengdu wedding clothes guest Technology Co., LTD</b> Member ID: cn1529950953vgjk Shop ID: 1101370208	vip@zandina.com
5	<b>AWM Store</b> <b>Shenzhen Haoyixin Technology Co., Ltd.</b> Member ID: cn1527900631imgx Shop ID: 1101326530	smthaoyixin1@sina.com
6	<b>Bessmini Apparel Store</b>	xuwang50178@aliyun.com

No.	Seller	Seller's Contact Information
	<b>Guangzhou Dehengtong Electronic Commerce Co., Ltd.</b> Member ID: cn1538978251jzix Shop ID: 1101777405	
10	<b>BX Groceries Store and July Loving Store and June Balala Store</b> <b>Shenzhen Qianhai Haiyi Industrial Co., Ltd.</b> Member ID: cn1529031398uuhz Shop ID: 1101350434 Member ID: cn1529013995yimh Shop ID: 1101349081 Member ID: cn1529030855bjqv Shop ID: 1101349763	smtqhhysy37@163.com smtqhhysy23@163.com smtqhhysy27@163.com
11	<b>COIN 78 Store</b> <b>Qianshan County Changheng Electronic Commerce Co., Ltd.</b> Member ID: cn1077795006cczae Shop ID: 1103318221	changxinfo006@163.com
13	<b>Day To Day shopping</b> <b>Shenzhen Arke Technology Co., Ltd.</b> Member ID: cn1513954205 Shop ID: 1101091564	suhongxia201516@163.com
14	<b>DilaFashion Store</b> <b>Shenzhen Yousheng Technology Co.</b> Member ID: cn1540504355iehc Shop ID: 1101648024	smtysjsyxgs6@163.com
15	<b>Doge Watches &amp; Clothes Store</b> <b>Shenzhen upper string Trading Co Ltd</b> Member ID: cn1513528805 Shop ID: 1101061720	lilanlilll3@163.com
16	<b>doitgood Store</b> <b>Shenzhen Liansheng Hong Trading Co., Ltd.</b> Member ID: cn1527411160fsac Shop ID: 1101319551	womencl886@163.com
17	<b>Dopamine clothing Store</b> <b>Changsha Ran Jiuju Trading Co., Ltd.</b> Member ID: cn1075680480mkoae Shop ID: 1102878165	smtjiuplvbya1@163.com
18	<b>Doremo Sexy Club Store</b> <b>Yiwu fishing fire Trade Co., LTD</b> Member ID: cn1520296810lldc Shop ID: 1101407384	yuhuomaoyi5@163.com
19	<b>EbadiahChoice Store and MalachiApparel Store</b> <b>Shenzhen Strauss Garment Co., Ltd</b>	ebadiahchoice@163.com

No.	Seller	Seller's Contact Information
	Member ID: cn1541372252jbu Shop ID: 1101742232 Member ID: cn1535885235bvwi Shop ID: 1101564390	malachi20000603@aliyun.com
20	<b>EFG Clothes Store</b> <b>Guangzhou Lian Nashuo Trading Co., Ltd.</b> Member ID: cn1544918611evvr Shop ID: 1101924830	smtlnssmyxgs3@163.com
21	<b>Enjoy Dream Store and FAIRY SEASON Official Store</b> <b>Shenzhen Haicheng Electronic Commerce Co., Ltd</b> Member ID: cn1064208199zwqae Shop ID: 1102133998 Member ID: cn1001997391zvuae Shop ID: 1102040457	Preoccupy@21cn.com DeepBlueSea@21cn.com
22	<b>facyuny Store and MORCH Store</b> <b>Fuzhou Yichuang Times Network Technology Co., Ltd.</b> Member ID: cn1540500882kmyc Shop ID: 1101652264 Member ID: cn1063057757fqrae Shop ID: 1102062859	baodan8880618@163.com joom888666@163.com
23	<b>Fashion Sexy Girl Store</b> <b>Dongshan Shijun Electric Appliance Store, Maitreya City</b> Member ID: cn1533892129mqqq Shop ID: 1101540256	smy18810380811@163.com
24	<b>Felyn Boutique 2 Store and Felyn Boutique Store</b> <b>Shop5584234 Store</b> <b>Zhangzhou Longwen District Yino Trading Co., Ltd.</b> Member ID: cn1531556843bjxs Shop ID: 1101763766	yunuomaoyi2020@hotmail.com
26	<b>Hotsell Factory Store, HaiN 99 Store and Shop5115029</b> <b>Store Dongguan Seabird Electronic Commerce Co., Ltd.</b> Member ID: cn1528816449omjr Shop ID: 1101343172 Member ID: cn1520928329apkj Shop ID: 1101262262	810515526@qq.com
27	<b>HWSTLE Store</b> <b>Quanzhou Lanxin Electronic Commerce Co., Ltd.</b> Member ID: cn1077075111rcfae Shop ID: 1103068335	lanxmy@163.com
29	<b>ICC Clothes Store</b> <b>Shenzhen Feijian Industrial Development Co., Ltd</b> Member ID: cn1535231137vkpo	szfeijian1904@163.com

No.	Seller	Seller's Contact Information
	Shop ID: 1101615559	
30	<b>Insvery Store</b> <b>Guangzhou Suxiao Network Technology Co., Ltd.</b> Member ID: cn1541602737mhqd Shop ID: 1101767016	suxiao7864@163.com
31	<b>Kliiou Store Twenty-three (Shenzhen) Electronic Commerce Co., Ltd.</b> Member ID: cn1541886798tksl Shop ID: 1101773598	2251667102@qq.com
33	<b>LDLC Store and WELOVE GOOD Store</b> <b>Changsha Dianao Trading Co., Ltd.</b> Member ID: cn1069272665tplae Shop ID: 1102277721 Member ID: cn1069272653pvmae Shop ID: 1102279642	smtdnsmyxgs2@163.com smtdnsmyxgs1@163.com
35	<b>Lucy Garment Factory Store</b> <b>Shenzhen Tianyu Technology Co., Ltd.</b> Member ID: cn1541524184cslx Shop ID: 1101752524	smttyhkjyxgs1@163.com
36	<b>Matteobenni Store and MatteobenniFly Store</b> <b>Guangzhou Meiwa Electronic Commerce Co., Ltd.</b> Member ID: cn1516574079ipng Shop ID: 1101192231 Member ID: cn1520074147bqih Shop ID: 1101241995	smt99178@sina.com matteobenni888@sina.com
39	<b>Men and women clothes Store</b> <b>Shenzhen Shenmeida Clothing Co., Ltd.</b> Member ID: cn1539366224upkn Shop ID: 1101610359	smtshenmeida1@163.com
40	<b>Milo Girl Store Qianshan County Xiubei Electronic Commerce Co., Ltd.</b> Member ID: cn1521664151rdak Shop ID: 1101274283	flovebei99@126.com
42	<b>Mo Rou Ni Store</b> <b>Jinjiang Lingyuan Ke Qingbiao Clothing Store</b> Member ID: cn1540824425oqol Shop ID: 1101710995	3321946889@qq.com
43	<b>MOOCLUND Store</b> <b>Changzhou Guomu Clothing Co., Ltd.</b> Member ID: cn1523766504lvrh Shop ID: 1101418771	1334569135@qq.com

No.	Seller	Seller's Contact Information
44	<b>My friend ya Store</b> <b>Shenzhen Meihoujia Electronic Commerce Co., Ltd.</b> Member ID: cn1520251155eqah Shop ID: 1101248419	stijuys@sina.com
45	<b>Niwaaa StoreLuofei Rain Department Store, Nanhai District, Foshan City</b> Member ID: cn1542312995mnda Shop ID: 1101794042	geojier14@163.com
46	<b>Nothing to Lose Dropshipping Store</b> <b>Shenzhen Hongba Yi Electronic Information Co., Ltd.</b> Member ID: cn1540636293tpxs Shop ID: 1101708263	smthbydzyxgs5@163.com
47	<b>RETURN SELF Store SHENZHEN YE TRADING TECHNOLOGY CO., LTD</b> Member ID: cn1539055143rfgn Shop ID: 1101608356	smtuyuyemaoyi5@163.com
49	<b>Safty Life Store Shenzhen Jihuahe Electronic Commerce Co., Ltd.</b> Member ID: cn1541319779nxzz Shop ID: 1101987071	xiongdal1122@163.com
50	<b>Shop1100087213 Store</b> <b>Guangzhou Xiaojun Trading Co., Ltd</b> Member ID: cn1529022288xkaw Shop ID: 1101985003	x6iaojunmaoyi@outlook.com
51	<b>Shop1102858077 Store and Women Fashion Clothes Putian Jiequan Information Technology Co., Ltd.</b> Member ID: cn1075704106kigae Shop ID: 1102861017 Member ID: cn1075274470azdae Shop ID: 1102853933	kcuai6@163.com jiwoguai19640816@163.com
53	<b>Shop45692467 Store</b> <b>Guangzhou Jiansui Rui Trading Co., Ltd.</b> Member ID: cn1543890080nkby Shop ID: 1101940315	zijunstore1@163.com
54	<b>Shop911128014 Store</b> <b>SHENZHEN FU HENG ELECTRONICS CO., LTD</b> Member ID: cn1533859812fick Shop ID: 1101577502	qimengstore5@163.com
55	<b>Shop911750699 Store</b> <b>Shenzhen Mijia Technology Co., Ltd</b> Member ID: cn1541050838gcmo Shop ID: 1101693682	elijah2one@163.com

No.	Seller	Seller's Contact Information
56	<b>Suancai Store</b> <b>Hefei Xiaohan Electronic Commerce Co., Ltd.</b> Member ID: cn1542242644cbpj Shop ID: 1101785790	lidandan_20202021@163.com
57	<b>Sweet Life Store</b> <b>Xiamen city fire gull Trading Co Ltd</b> Member ID: cn1072275936pdcae Shop ID: 1102546365	huangjg1994@163.com
58	<b>Tao Tao Yi Store</b> <b>Guangzhou Guigerian Trading Co., Ltd.</b> Member ID: cn1544902763emws Shop ID: 1101924815	smtgglsmyxgs1@163.com
59	<b>Toplle Store</b> <b>Qianhao Electronic Commerce (Shenzhen) Co., Ltd.</b> Member ID: cn1543058094pfap Shop ID: 1101841879	1251243716@qq.com
61	<b>Unique Frost Store</b> <b>Guangzhou Feirui Fan Trading Co., Ltd.</b> Member ID: cn1544748101xacc Shop ID: 1101913315	smtfyfsmyxgs5@163.com
62	<b>Variety girl-Store Guangzhou Darwin Cross-border E-Commerce Co., Ltd.</b> Member ID: cn1538918611lddm Shop ID: 1101599870	s18810380811@163.com
63	<b>Wenclothes Store</b> <b>Quanzhou Changge Trading Co., Ltd.</b> Member ID: cn1542486763fmmh Shop ID: 1101827052	y18650115940@163.com
65	<b>Xinceng Store</b> <b>Dongguan Kangya Electronic Technology Co., Ltd.</b> Member ID: cn1537258503skgg Shop ID: 1101564200	405121607@qq.com
66	<b>YangYang Baby Store</b> <b>Shenzhen Yiping Garment Co., Ltd</b> Member ID: cn1521331244rovx Shop ID: 1101322668	drakeyy@163.com
67	<b>YESSS Store</b> <b>Shenzhen Baoan District Guozhier Clothing Firm</b> Member ID: cn1538477194dhrr Shop ID: 1101599098	geojier2020@163.com
68	<b>Yezekiel2First Store</b> <b>Shenzhen Dianyu Garment Co., Ltd</b> Member ID: cn1070907803yykae Shop ID: 1102346242	yezekiel2first@163.com

No.	Seller	Seller's Contact Information
70	<b>yizhanggui Store</b> <b>Shangrao Yufei Clothing Management Co., Ltd.</b> Member ID: cn1540495219ejeh Shop ID: 1101659656	fujawei0818@sina.com
71	<b>YoulikeAll Store</b> <b>LIUZHOU MANAGER TRADING CO., LTD</b> Member ID: cn1533630128lxhv Shop ID: 1101510896	liumange665@163.com
75	<b>YY Beautiful Clothes Store</b> <b>Maitrya City Department Store Yesterday</b> Member ID: cn1544917454gnmg Shop ID: 1102773847	U18810380811@163.com
78	<b>ZZ-Clothing Store</b> Member ID: cn1542432070wlxk Shop ID: 1101794249	e18810380811@163.com
79	<b>7-A girl Store</b> Luohe 24 o'clock Electronic Commerce Co., Ltd Member ID: cn1521761482rhir Shop ID: 1101415574	970438769@qq.com
80	<b>A Lin Clothing Store A Lin Clothing Store in Zhongyuan District of Zhengzhou City</b> Member ID: cn1073280039jrwa Shop ID: 1102666101	alin519611@gmail.com
81	<b>A woman's Wardrobe Qianshan County Yiyang Electronic Commerce Co., Ltd.</b> Member ID: cn1077434989puuae Shop ID: 1103307249	254383704@qq.com
82	<b>AEY168 Store</b> <b>Yiwu Yan Can Trading Co., Ltd.</b> Member ID: cn1545324980hmln Shop ID: 1101940077	luoan1688@gmail.com
83	<b>Affya women Store</b> <b>Shanghai zucan tree Trading Co Ltd</b> Member ID: cn1532967531vtdz Shop ID: 1101403944	1542431466@qq.com
84	<b>Aicoinsan889 Store Shenzhen Xinhui Chengxin Information technology Co., Ltd.</b> Member ID: cn1521728826rhex Shop ID: 1101298752	aicoinsan@163.com
85	<b>angelaufu Store</b> <b>Shishi City Fumin Longhe Trading Co., Ltd.</b> Member ID: cn1513955527 Shop ID: 1101471076	cgf520lyl@163.com



No.	Seller	Seller's Contact Information
87	<b>Baby AToys Store</b> <b>Wuhan Yuchengwei Electronic Commerce Co., Ltd.</b> Member ID: cn1539954907bcbp Shop ID: 1101953151	yuchwei06@163.com
88	<b>Beautiful day Dropshipping Store</b> <b>Shenzhen Kaifa Chang Export Trade Co., Ltd.</b> Member ID: cn1540803054ggkz Shop ID: 1101703425	smtkfckyxgs2@163.com
89	<b>Besley &amp; Halpert Store</b> <b>Shenzhen Linlang Jiapin Trading Co., Ltd.</b> Member ID: cn1523985140slhl Shop ID: 1101423754	smllmorrl05@163.com
90	<b>Black cat shop Store</b> <b>Shantou city success Logistics Co Ltd</b> Member ID: cn1060586096puuae Shop ID: 1102023052	909151124@qq.com
91	<b>Botvotee Chic Store</b> <b>Dongguan Humen Dahai Clothing Store</b> Member ID: cn1003173676dboae Shop ID: 1102033768	dahaifushi06@163.com
92	<b>CharmingFashion Store</b> <b>Xiamen Ousikai ElectronicS Technology Co., Ltd.</b> Member ID: cn1531759050uyet Shop ID: 1101397501	xmosk122@163.com
93	<b>Cozok Girl Store</b> <b>Shenzhen China Hesheng Trading Co., Ltd.</b> Member ID: cn1074961474jkgae Shop ID: 1102724219	leofeng1112@163.com
94	<b>Cynthia-Goddess Store</b> <b>Guangzhou Anresen Trading Co., Ltd.</b> Member ID: cn1547023898czil Shop ID: 1101951560	smtalssmyxgs3@163.com
95	<b>Dazzling Styles Store</b> <b>Shenzhen Sifan Electronics Co., Ltd.</b> Member ID: cn1520334167jorn Shop ID: 1101245280	ursulaai@sina.com
96	<b>Diousha Evening Dresses</b> <b>Suzhou Ziyu Butterfly Trading Co., Ltd.</b> Member ID: cn1001131184 Shop ID: 1100505994	875035922@qq.com
97	<b>dropclothes Store</b> <b>Shenzhen Gesheng Technology Co., Ltd</b> Member ID: cn1536277685uijq Shop ID: 1101555759	qq601838264@126.com

No.	Seller	Seller's Contact Information
98	<b>Duzeala Store</b> <b>Suzhou Yixiu Trading Co., Ltd.</b> Member ID: cn1521700119ehbr Shop ID: 1101274820	dwy0210@163.com
99	<b>Elegant Evening Dress Store</b> <b>Hefei Baohe District Quasi Clothing Store</b> Member ID: cn1541031538qfrq Shop ID: 1101757499	tyh1556218638@163.com
100	<b>Evan Co. Ltd</b> <b>Shangrao Haobo Trading Co., Ltd.</b> Member ID: cn1511075620 Shop ID: 1100858376	xuzihao1019@163.com
101	<b>Fabulous Femme Store</b> <b>Hainan Linghe Trading Co Ltd</b> Member ID: cn1074816481xpoae Shop ID: 1102816281	lm18502010391@163.com
102	<b>Girl clothes factory shop Store and HE LIANG SHENG Clothing Store Store</b> Xiamen He Yun He Technology Co., Ltd. Member ID: cn1544965478shvx Shop ID: 1101910575	2671962050@qq.com
103	<b>Gugoods StoreSuzhou preferred good things fElectronic Commerce Co., Ltd.</b> Member ID: cn1524361155ubqm Shop ID: 1101793904	747139370@qq.com
104	<b>Halloween Factory Store</b> <b>Quanzhou Wanen Electronic Commerce Co., Ltd</b> Member ID: cn117597085 Shop ID: 1100828464	instyleswear@gmail.com
105	<b>HAO YUN Store</b> <b>Shangrao Qingzi Clothing Co., Ltd.</b> Member ID: cn1068747969jrtae Shop ID: 1103104074	13353397079@189.cn
106	<b>HGSH Women Garment Store Qingdao Hengguan Senhe Electronic Commerce Co., Ltd.</b> Member ID: cn1074002067vxhae Shop ID: 1102789494	192355680@qq.com
107	<b>Hi 8899 Store Store Dongshan Shijun Electric Appliance Store, Maitreya City</b> Member ID: cn1533834973dewq Shop ID: 1101875706	sxy18810380811@163.com
109	<b>HJ-Wedding Prom Dress</b> <b>Suzhou Heijiao Network Technology Co., Ltd.</b> Member ID: cn1073858433thgae	heijiaokeyi04@163.com

No.	Seller	Seller's Contact Information
	Shop ID: 1102786081	
110	<b>Hopeshow Store</b> <b>Taijiang District Glory Real Estate Agency</b> Member ID: cn1531664180sdum Shop ID: 1101578170	tjqryfc225@163.com
111	<b>huangshi Store</b> <b>Nanyang Zhengtong Electronic Commerce Co., Ltd.</b> Member ID: cn1542441370pdod Shop ID: 1101867402	uder5333@21cn.com
112	<b>huashang Maxi Store</b> <b>Shenzhen beautiful clothing trade Co., LTD</b> Member ID: cn1520848917xcet Shop ID: 1101260685	3076686340@qq.com
113	<b>JinFashionClothesFactory Store</b> <b>Fuzhou Huijia Real Estate Agency Co., Ltd.</b> Member ID: cn1543414861ilen Shop ID: 1101856223	aiyoujin11@sina.com
114	<b>JISSAYES Store</b> <b>Shenzhen TianDebao Technology Co., Ltd.</b> Member ID: cn1078034135peeae Shop ID: 1103441040	3062969689@qq.com
115	<b>Kalenmos Dropshipping Store and Kalenmos World Apparel Store</b> <b>Yiwu Youyun Network Technology Co., Ltd.</b> Member ID: cn1533487559epge Shop ID: 1101494205 Member ID: cn1529195598hvba Shop ID: 1101355860	yywlnetwork3@163.com kalenmos@163.com
116	<b>Le Ning Shang Store</b> <b>Qianshan County Le Ning Shang Clothing Co., Ltd.</b> Member ID: cn1074337110pdiae Shop ID: 1102658390	1298241674@qq.com
117	<b>LULU Women Store</b> <b>Guangshui Kangli Trading Co., Ltd.</b> Member ID: cn1541480313ycap Shop ID: 1101745803	bsrsmt002@163.com
118	<b>Mifafa Store</b> <b>Wuhan Gull Wing Information Consulting Co., Ltd.</b> Member ID: cn1064979414rfiae Shop ID: 1102115793	minglangkeji82@163.com
119	<b>MM Stylish Clothes Store</b> <b>Yiwu ertong e-commerce firm</b>	yimoast@163.com

No.	Seller	Seller's Contact Information
	Member ID: cn1541447384mroe Shop ID: 1101748623	
120	<b>My Naughty Girl Store Ying Ying Department Store, Nanhai District, Foshan City</b> Member ID: cn1070497359sllae Shop ID: 1102127961	caiyingxin02@126.com
121	<b>New Experience Store</b> <b>Quanzhou Yingwei Network Technology Co., Ltd.</b> Member ID: cn1537639538uxsp Shop ID: 1101570904	yingweisumaitong4@163.com
122	<b>QXKJ-1 Store LEDP QX-CTO Whsel Store</b> <b>Wuxi Qingxin Technology Co., Ltd.</b> Member ID: cn1072680886kiyae Shop ID: 1102634347	472747871@qq.com
123	<b>RyansDress Store</b> <b>Guangzhou Nashuo Trading Co., Ltd.</b> Member ID: cn1544985506yhee Shop ID: 1101923522	smtlnssmyxgs6@163.com
124	<b>SASAMINI Store</b> <b>Guangzhou Weituo Electronic Commerce Co., Ltd</b> Member ID: cn1529294269kybh Shop ID: 1101365449	yuanlinstore5@sina.com
125	<b>Sexy Beauty Girl StoreShop1102983689 Store</b> <b>Guangzhou Jingyuan E-Commerce Co., Ltd</b> Member ID: cn1078345144bsuae Shop ID: 1102986671	aq19124355865@163.com
126	<b>SGCHUA Store</b> <b>Xingcheng Pengrong Garment Factory</b> Member ID: cn1529853468lzff Shop ID: 1101367470	sgchua2020@126.com
127	<b>Sheiny Store</b> <b>Shenzhen Xifan Ni Trading Co., Ltd.</b> Member ID: cn1072178760garae Shop ID: 1102551046	sheiny2022@163.com
128	<b>Shop1102089173 Store</b> <b>Guangzhou thick Electronic Technology Co., LTD</b> Member ID: cn1067376224rovae Shop ID: 1102086198	469193398@qq.com
129	<b>Shop1102162304 Store</b> <b>Guangzhou barley International Trading Co Ltd</b> Member ID: cn1068698257okeae Shop ID: 1102152342	826082960@qq.com

No.	Seller	Seller's Contact Information
130	<b>Shop1102699168 Store</b> <b>Shenzhen Gao Fei Feng Trading Co. Ltd.</b> Member ID: cn1074817648pwbae Shop ID: 1102697178	cici19982020@outlook.com
131	<b>Shop1102773971 Store</b> <b>Shanghai Chengshaner Electronic Commerce Co., Ltd.</b> Member ID: cn1073546286fyfae Shop ID: 1102776533	13456975838@163.com
132	<b>Shop1102788842 Store</b> <b>Zhenping Xunkang Trading Co., Ltd.</b> Member ID: cn1074026204oggae Shop ID: 1102788843	aaa376118@sina.com
134	<b>Shop1102989099 Store</b> <b>Zhongshan Chuangxi Electronic Technology Co., Ltd</b> Member ID: cn1076736367liwae Shop ID: 1102983381	zschuangxi03@163.com
135	<b>Shop1103150556 Store</b> <b>Shangrao Tianen Electronic Commerce Co., Ltd.</b> Member ID: cn1077576675jfrae Shop ID: 1103128968	lgl18479339088@qq.com
136	<b>Shop1103183130 Store</b> <b>Zhenping County Guolin Rain Trading Co. Ltd.</b> Member ID: cn1076715480zvvae Shop ID: 1103188117	zhaoyangli20141216@163.com
137	<b>Shop1103478006 Store</b> <b>Pucheng County Bian Yixing Department Store</b> Member ID: cn1078658023hfmae Shop ID: 1103478007	yhepyso865831@163.com
138	<b>Shop2925092 Store</b> <b>Shenzhen Vision Electronic Commerce Co., Ltd.</b> Member ID: cn1520092709jvat Shop ID: 1101248331	kreenda@sina.com
140	<b>Shop4999160 Store</b> <b>Shenzhen Hailihui Electronic Commerce Co., Ltd.</b> Member ID: cn1523914189mvlb Shop ID: 1101434700	hsjdis1@sina.com
141	<b>Shop5017195 Store</b> <b>Foshan Lapa Network Technology Co., Ltd.</b> Member ID: cn1528362530qzix Shop ID: 1101438922	pylmaternity19@163.com
142	<b>Shop5246274 Store</b> <b>Yiwu Shurui Electronic Commerce Co., Ltd.</b> Member ID: cn1529050738ppdl Shop ID: 1101352713	1981327530@qq.com

No.	Seller	Seller's Contact Information
143	<b>Shop5250273 Store and Urban dresses drop (shipping store) Shenzhen Qianhai Haiyi Industrial Co., Ltd.</b> Member ID: cn1529000253wemu Shop ID: 1101351394 Member ID: cn1529030135gqon Shop ID: 1101352726	smtqhhysy36@163.com smtqhhysy29@163.com
144	<b>Shop5870638 Store Qianshan County Ruoxi Clothing Management Co., Ltd.</b> Member ID: cn1533294840jrid Shop ID: 1101504515	srrxdzsw@163.com
145	<b>Shop911345044 Store Changsha Kaijia Jewelry Co., Ltd.</b> Member ID: cn1531572688ysgm Shop ID: 1101605326	lujiangh11@126.com
146	<b>Shop912143244 Store Guangzhou Duo Pin Clothing Co., Ltd.</b> Member ID: cn1542210814cdho Shop ID: 1101787189	shangkou2021@126.com
147	<b>Sishion Retro Store Yiwu Shixun Electronic Commerce Co., Ltd.</b> Member ID: cn1513373863 Shop ID: 1101063200	larryhuang518@outlook.com
148	<b>Stephanie-Sarah Store Qingdao Erxiu Mengchuang Electronic Commerce Co., Ltd.</b> Member ID: cn1077123263cgbae Shop ID: 1103081445	705297942@qq.com
149	<b>Super Sellers Sara Guangzhou Ciran Trading Co., Ltd.</b> Member ID: cn1511782987 Shop ID: 1100953805	alilss@126.com
150	<b>Tokimai Store Shenzhen Explorer Investment Development Co., Ltd.</b> Member ID: cn1538642440bmtty Shop ID: 1101591199	tk@fumalon.com
152	<b>Truyee Accessories Co Ltd Store and Tuyee Co Ltd Store Nanchang Xianting Shiqu Electronic Commerce Co., Ltd.</b> Member ID: cn1073953295ksuae Shop ID: 1102457212 Member ID: cn1073929078fdcae Shop ID: 1102459079	xianting1202@126.com xianting1101@126.com
153	<b>Vercareless Store Guangzhou Hongling Technology Co., Ltd</b> Member ID: cn1533668430ymzt	xskjdh004@163.com

No.	Seller	Seller's Contact Information
	Shop ID: 1101683266	
154	<b>Wildcoco Store</b> <b>Beijing Star Daren Technology zCo., Ltd</b> Member ID: cn1542522772afbb Shop ID: 1101820941	kinikiss2021720@163.com
155	<b>Worldwide dropshipping factory store</b> <b>Shenzhen Samuel Trading Co., Ltd</b> Member ID: cn1541201413gjix Shop ID: 1101692894	shenzhensamuer2@126.com
156	<b>WSFEC Fashion Store Jinjiang Dongshi Liu Shaofeng</b> <b>Clothing Business Department</b> Member ID: cn1072058024iovae Shop ID: 1102460251	ab23486262@163.com
157	<b>WXM Clothes Store</b> <b>Wuhan Yaxunchi Trading Co., Ltd.</b> Member ID: cn1074819091tgiae Shop ID: 1102942557	yaxunchi01@163.com
158	<b>XINDONGYI Store</b> <b>Shenzhen Dongxin Trading Co., Ltd</b> Member ID: cn1529118664exla Shop ID: 1101355580	xindongyi123@sina.com
159	<b>Y-GEOJIEER Store</b> <b>Foshan Nanhai District Yonoi Clothing Store</b> Member ID: cn1541320443jecu Shop ID: 1101718455	geojier11@163.com
160	<b>Yi Xian Baby Store</b> <b>Shenzhen Fengqi Trading Co., Ltd.</b> Member ID: cn1510144128 Shop ID: 1100737568	sbw1387@163.com
161	<b>youly Store</b> Member ID: cn1519979332bvvd Shop ID: 1101239923	654586047@qq.com
162	<b>Your Magical Wardrobe Store</b> Member ID: cn1524355517kwel Shop ID: 1101300716	bsmisy@163.com
163	<b>YUCHENGRUNDA Garment Store and YUHRUDA</b> <b>Garment Store Store Qingdao Youcheng Runda</b> <b>Industry and Trade Co., Ltd.</b> Member ID: cn1058043757iirae Shop ID: 1102036298 Member ID: cn1058067275khzae Shop ID: 1101991348	2197149741@qq.com 2287711092@qq.com



No.	Seller	Seller's Contact Information
164	<b>Zoetuo Official Store Shop5361030 Store</b> <b>Guangzhou Xinyi Bamboo Garment Co., Ltd.</b> Member ID: cn1529019613khau Shop ID: 1101355567	xyz18027451119@163.com
165	<b>ZYBELLE Store</b> <b>Shenzhen Ligan Port Ask Technology Co., Ltd.</b> Member ID: cn1541243673yjhi Shop ID: 1101708717	smtlqgwkjyxgs5@163.com
166	<b>Zztrace 1009 Store</b> <b>Qionghai Zhusuo Trading Co., Ltd.</b> Member ID: cn1072011647ptdae Shop ID: 1102455550	huangmijiao71@163.com
167	<b>B-52Gluehwein Store</b> <b>Guangzhou feizhan dream Trading Co., LTD</b> Member ID: cn1546870751hhgi Shop ID: 1101954870	smtfzmsmyxgs6@163.com
168	<b>Dropshipping Shenzhen China Clothes Store</b> <b>Shenzhen Blue Valley Network Technology Co., Ltd.</b> Member ID: cn1542607270pkio Shop ID: 1101820629	smtlgdwlyxgs1@163.com
169	<b>Fashion Yuer Store</b> <b>Shangrao Longqiao Clothing Co., Ltd.</b> Member ID: cn1077841161szrae Shop ID: 1102907498	2621744547@qq.com
170	<b>FENGDAO Store</b> <b>Zhuzhou Elan Trading Co., Ltd.</b> Member ID: cn1528096749mmoi Shop ID: 1101436497	fengdaofa@outlook.com
171	<b>Invincible-Move forward -Never give up Store</b> <b>Shenzhen Pengpeng Square Technology Co., Ltd.</b> Member ID: cn1513837582 Shop ID: 1101098975	qiujinhaqjh214@163.com
172	<b>Naina Store</b> <b>Guangzhou Naina International Trade Co Ltd</b> Member ID: cn1542563430rrfz Shop ID: 1101808094	1971553914@qq.com
173	<b>NavOra Girl Store</b> <b>Shenzhen Qicheng Electronic Commerce Co., Ltd.</b> Member ID: cn1061160087okvae Shop ID: 1102023978	joyousehome01@126.com
174	<b>Plus Size Swimwear Store</b> <b>Guangzhou Huanshang Clothing Co., Ltd</b> Member ID: cn1001476267 Shop ID: 1102044468	429690045@qq.com



No.	Seller	Seller's Contact Information
175	<b>POSH YLSHEN Official Store</b> <b>Shenzhen Yusheng Trading Co., Ltd.</b> Member ID: cn1528098384deoq Shop ID: 1101436860	e-sales-wendy@hotmail.com
176	<b>QNPQYX Official Store</b> <b>Nanchang Qingniao Electronic Commerce Co., Ltd.</b> Member ID: cn1528936101cbvo Shop ID: 1101447008	844334940@qq.com
177	<b>Secret Swimsuit Store</b> <b>Xuchang Lewo Trading Co., Ltd.</b> Member ID: cn1519532189yuzq Shop ID: 1101226930	xuchanglewo@sina.com
178	<b>Shop1103432206 Store</b> <b>Fuzhou Yunying trading Co., Ltd.</b> Member ID: cn1080649065vriac Shop ID: 1103432207	daisy@mylacesfactory.com
179	<b>Shop5242088 Store</b> <b>Qintian Yiwu Sihai Electronic Commerce Co., Ltd.</b> Member ID: cn1527247982ntoa Shop ID: 1101348813	345awen5@sina.com
180	<b>SL-TX24 Store Jinshan Wensilong Garment Firm, Cangshan District, Fuzhou City</b> Member ID: cn1068864264loyae Shop ID: 1103331584	caiyulintx24@163.com
181	<b>They should belong to you Store</b> <b>Shenzhen Xingli Trading Co., Ltd</b> Member ID: cn1539591263imuy Shop ID: 1101618790	smtxlsmyxgs5@163.com
182	<b>VAZN Official Store</b> Member ID: cn1528967888bymo Shop ID: 1101347530	fanximaoyi2027@hotmail.com
183	<b>VogueU Store</b> <b>Jianyang Mupiao Department Store</b> Member ID: cn1539771837bzaz Shop ID: 1101631360	qingte957@163.com
184	<b>Waterarea Store</b> <b>Xiamen Mingqi Electronic Commerce Co., Ltd.</b> Member ID: cn1529216861ysdp Shop ID: 1101355198	liucm0125@163.com
185	<b>Wildgeeker Store</b> <b>Xi'an Chaogou Information Technology Co., Ltd.</b> Member ID: cn1518048534upmh Shop ID: 1101204438	alibuy@thumbaby.com

No.	Seller	Seller's Contact Information
186	<b>X Tao Store Store</b> <b>Qianshan County Le Ning Shang Clothing Co., Ltd.</b> Member ID: cn1077771220nzgae Shop ID: 1103316275	3665232783@qq.com
187	<b>XXOwen Li Store Shangrao Ouzi Thousand Clothing Management Co., Ltd.</b> Member ID: cn1541335980edus Shop ID: 1101709082	color8888@aliyun.com
188	<b>zhong qiu Store</b> <b>Shangrao Aifeng Clothing Co., Ltd.</b> Member ID: cn1542560224stzi Shop ID: 1101817512	15270383056@139.com

**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-03191-VMK-GAF**

Honorable Chief Judge Virginia M. Kendall  
Magistrate Gabriel A. Fuentes

HEARING DATE: January 14, 2025  
HEARING TIME: 9:30 A.M.  
COURTROOM: 2541

**PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR ENTRY OF  
DEFAULT JUDGMENT AGAINST THE IDENTIFIED DEFAULTED SCHEDULE “A”  
DEFENDANTS PURSUANT TO FRCP 55(b)(2)**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”) hereby submits this Memorandum of Law in support of its Motion for Entry of Default Judgment (the “Motion”) pursuant to Federal Rule of Civil Procedure 55(b)(2) (“Rule 55(b)(2)”) against the identified one hundred and sixty-two (162) Schedule “A” Defendants (the “Defaulted Defendants”), which have been separately listed in Exhibit “1” to the accompanying Declaration of Shawn A. Mangano, Esq. (the “Mangano Decl.”). Plaintiff’s Motion is made and based upon this Memorandum of Law, the Mangano Declaration, the Declaration of Liangjie Li (the “Li Decl.”), the papers and pleadings on file in this action, and any argument of counsel the Court may entertain.

**I. INTRODUCTION**

On September 10, 2024, the Court granted Plaintiff’s Motion for Entry of Clerk’s Default against the Defaulted Defendants. [Dkt. No. 41.] Pursuant to Rule 55(b)(2), Plaintiff now respectfully moves this Court for entry of a default judgment finding the Defaulted Defendants

liable on all counts asserted in Plaintiff's Complaint. [Dkt. No. 1.] These asserted counts include claims for Copyright Infringement (Count I), False Designation of Origin under 35 U.S.C. §1125(a) (Count II), and violation of the Illinois Uniform Deceptive Trade Practices Act (the "Uniform Deceptive Trade Practices Act") (Count III). [Dkt. No. 1 at 8-13.]

In connection with its asserted claims for relief, Plaintiff seeks an award of statutory damages pursuant to 17 U.S.C. § 504(c) against all Defaulted Defendants, which should be enhanced, for their willful infringement of the following three (3) federally registered copyrights asserted in this action: (1) VA0002379907; (2) VA0002379881; and (3) VA0002379893 (the "Copyright Protected Images"). (Mangano Decl. ¶ 5.) Plaintiff additionally requests the Court issue a permanent injunction against the Defaulted Defendants. *See* 17 U.S.C. § 502(a). Furthermore, Plaintiff requests an award attorneys' fees and costs for the Defaulted Defendants' willful infringement of the company's Copyright Protected Images pursuant to 17 U.S.C. § 505. Alternatively, Plaintiff requests issuance of a permanent injunction and an award of attorneys' fees and costs based on the Defaulted Defendants' willful violation of the Uniform Deceptive Trade Practices Act.

As alleged in the Complaint, the Defaulted Defendants have displayed, without authorization, the Copyright Protected Images on the AliExpress.com online sales platform (the "Platform") to market and sell knockoff, counterfeit products resembling Plaintiff's authentic Rotita brand products, thereby deceiving public consumers as to the quality, nature, and source of goods being purchased. (Mangano Decl. ¶ 6.) Moreover, the Defaulted Defendants are alleged to be operating as part of a coordinated, sophisticated counterfeit product network that utilizes a common supply chain and manufacturing source to fulfill consumer orders for knockoff Rotita brand products by displaying, without authorization, Plaintiff's Copyright Protected Images on

their online storefronts. (Mangano Decl. ¶¶ 8, 11-12.) These circumstances clearly demonstrate the Defaulted Defendants have willfully and intentionally infringed Plaintiff's Copyright Protected images, thereby supporting the company's request for enhanced statutory damages and its entitlement to an award of attorneys' fees and costs under either the Copyright Act (17 U.S.C. § 505) or the Uniform Deceptive Trade Practices Act (815 ILCS § 510/3). (*Id.*)

Procedurally, Rule 55(b)(2) provides for a court-ordered default judgment which establishes, as a matter of law, that defendants are liable to plaintiff on each cause of action alleged in the complaint. *United States v. Di Mucci*, 879 F.2d 1488, 1497 (7th Cir. 1989). When the Court determines that a defendant is in default, the factual allegations of the complaint are taken as true and may not be challenged, and the defendants are liable as a matter of law as to each cause of action alleged in the complaint. *Black v. Lane*, 22 F.3d 1395, 1399 (7th Cir. 1994). Plaintiff meets the requirements for entry of the requested default judgment under Rule 55(b)(2).

## **II. ARGUMENT**

On September 10, 2024, the Court granted Plaintiff's Motion for Entry of Clerk's Default. [Dkt. No. 41.] Thus, the Defaulted Defendants' right to appear in this action and contest Plaintiff's asserted claims for relief have been precluded. *See Black*, 22 F.3d at 1399. Given this procedural posture, the present Motion seeks to establish the Defaulted Defendants' liability for Plaintiff's asserted claims for relief against them. *See Fed.R.Civ.P. 55(b)(2)*.

Specifically, Plaintiff's Motion seeks entry of a default judgment against the Defaulted Defendants determining them liable for Copyright Infringement (Count I), False Designation of Origin under 35 U.S.C. §1125(a) (Count II), and violation of the Uniform Deceptive Trade Practices Act (Count III) as asserted in the company's Complaint. [Dkt. No. 1 at 8-13.]. As discussed below, Plaintiff is entitled to entry of a default judgment against the Defaulted

Defendants pursuant to Rule 55(b)(2) that awards the company enhanced statutory damages for willful copyright infringement, issuance of a permanent injunction for copyright infringement and/or violation of the Uniform Deceptive Trade Practices Act, and an award of attorneys' fees and costs for willful copyright infringement and/or their willful violation of the Uniform Deceptive Trade Practices Act.

**A. Plaintiff is Entitled to Entry of the Requested Default Judgment.**

Rule 55(b)(2) of the Federal Rules of Civil Procedure generally provides for entry of a court-ordered default judgment against one or more defending parties that failure to appear, answer, and/or defendant allegations asserted against them. Fed.R.Civ.P. 55(b)(2). A default judgment establishes, as a matter of law, that named, unresponsive, defendants are liable on each cause of action alleged against them in the complaint. *Di Mucci*, 879 F.2d at 1497. When a court determines that a defendant is in default, the factual allegations of the complaint are taken as true and may not be challenged, and the defendants are liable as a matter of law as to each cause of action alleged in the complaint upon entry of default judgment. *Black*, 22 F.3d at 1399.

As noted above, on September 10, 2024, the Court granted Plaintiff's Motion for Entry of Clerk's Default against the Defaulted Defendants. [Dkt. No. 41.] Thus, default has already been entered against the Defaulted Defendants. Given the Court's entry of Default, Plaintiff is entitled to entry of a default judgment pursuant to Rule 55(b)(2) against the Defaulted Defendants for copyright infringement, false designation of origin, and violation of the Uniform Deceptive Trade Practice Act as asserted in the Complaint. [Dkt. No. 1 at 8-13.]

As argued below, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the Defaulted Defendants: (1) an award of statutory damages and profits for copyright infringement under 17 U.S.C. § 504(c)(1); (2) an award of enhanced statutory

damages for willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) entry of a permanent injunction pursuant to 17 U.S.C. § 502(a); (4) alternatively, entry of a permanent injunction pursuant to 815 ILCS § 510/3; and (5) an award of attorneys' fees and costs pursuant to 17 U.S.C. § 505 for willful copyright infringement and/or for willful violation of the Uniform Deceptive Trade Practices Act pursuant to 815 ILCS § 510/3. Plaintiff does not seek any relief related to its false designation of origin claim that such relief would be duplicative of the relief requested for willful copyright infringement and for violation of the Uniform Deceptive Trade Practices Act.

**B. Plaintiff is Entitled to the Relief Requested.**

Through entry of default [Dkt. No. 41], Plaintiff has established that all Defaulted Defendants: (1) are liable for intentionally and willfully infringing the Copyright Protected Images; (2) are liable for false designation of origin; and (3) have willfully violated the Uniform Deceptive Trade Practices Act. [Dkt. No. 1 at 8-13.] As such, the only the following issues remain to be adjudicated through the Motion: (1) Plaintiff's entitlement to an award of statutory damages for infringement of the Copyright Protected Images; (2) the company's request that any statutory damage award be enhanced based on the Defaulted Defendants' willful copyright infringement; (3) the company's right to issuance of a permanent injunction against the Defaulted Defendants; and (4) the propriety of an award of attorneys' fees and costs for the Defaulted Defendants' willful infringement of the Copyright Protected Images and/or their willful violation of the Uniform Deceptive Trade Practices Act. Plaintiff asserts that it is entitled to all relief requested through its Motion.

***1. Plaintiff is entitled to statutory damages under 17 U.S.C. § 504(c)(1).***

Turning first to the request for an award of statutory damages under 17 U.S.C. § 504(c)(1) against the Defaulted Defendants. Plaintiff is entitled to such relief for the Defaulted Defendants'

infringement of the company's Copyright Protected Images, which it maintains was done willfully and intentionally. (Mangano Decl. ¶¶ 8, 11-12.)

A copyright owner is entitled to recover the actual damages suffered for infringement, and any profits of the infringer that are attributable to the infringement and are not taken into account in computing the actual damages. 17 U.S.C. § 504(b). In establishing the infringer's profits, the copyright owner is required to present proof only of the infringer's gross revenue, and the infringer is required to prove his or her deductible expenses and the elements of profit attributable to factors other than the copyrighted work. 17 U.S.C. § 504(b). "[S]tatutory damages have been held to be appropriate on a motion for default judgment because the defaulting party has the information needed to prove actual damages." *White v. Marshall*, 771 F.Supp.2d 952, 956 (E.D. Wis. 2011); *see also Wondie v. Mekuria*, 742 F.Supp.2d 118, 124-25 (D.D.C. 2010); *Lifted Research Grp., Inc. v. Behdad, Inc.*, 591 F.Supp.2d 3, 8 (D.D.C. 2008).

First, Plaintiff has asserted a viable claim for infringement of the Copyright Protected Images. To prove copyright infringement, a plaintiff must show: "(1) ownership of a valid copyright; and (2) copying of constituent elements of the work that are original." *JWC Invs., Inc. v. Novelty, Inc.*, 482 F.3d 910, 914 (7th Cir. 2007). A certificate of copyright registration provides a *prima facie* presumption of validity. *Mid. American Title Co. v. Kirk*, 59 F.3d 719, 721 (7th Cir. 1995). Here, Plaintiff has alleged its ownership of the asserted. Copyright Protected Images in its Complaint [Dkt. No. 1 at 9] and has supplied the Court with a summary of all registrations issued by the United States Copyright Office [Dkt. No. 1, Ex. 1]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulted Defendants have infringed the company's Copyright Protected Images. [Dkt. Nos. 1 at 15-34, 19-2, 22.] Accordingly, Plaintiff



has established that the Defaulted Defendants have infringed the company's Copyright Protected Images.

Next, Plaintiff is entitled to an award of statutory damages given the circumstances in this action. An award of statutory damages is appropriate because actual damages "are often virtually impossible to prove . . . ." *White*, 771 F.Supp.2d at 956. In awarding statutory damages, the court is not required to follow any rigid formula. *Id.* (citing *Chi-Boy Music v. Charlie Club, Inc.*, 930 F.2d 1224, 1229 (7th Cir. 1991)). Instead, the court enjoys wide discretion in setting a statutory damage award within the prescribed range from \$750 to \$30,000 per infringement. *Broadcast Music, Inc. v. Star Amusements, Inc.*, 44 F.3d 485, 489 (7th Cir. 1995). The court may consider such factors as the difficulty or impossibility of proving actual damages, the circumstances of the infringement, and the efficacy of the damages as a deterrent to future copyright infringement. *Chi-Boy Music*, 930 F.2d at 1229.

Plaintiff has established unquestionably viable copyright infringement claims in this case. Most notably, Plaintiff secured entry of a preliminary injunction in this case. [Dkt. No. 35.] This ruling is consistent with Judge Kennelly's issuance of preliminary injunctive relief in Plaintiff's favor against defendants engaged in identical acts of intentional copyright infringement on the same Platform in what he considered to be one of the most contested Schedule "A" cases he had encountered in recent memory. (Mangano Decl. ¶ 9.) Following Judge Kennelly's decision, defendants in other pending actions brought by Plaintiff, including the Defaulted Defendants in this action, have simply failed to appear and defend. (*Id.*) The Defaulted Defendants' refusal to appear and defend against the asserted claims, however, has deprived Plaintiff of the ability to present evidence concerning verifiable infringing sales or costs associated with such sales. (*Id.* ¶ 7.)

Specifically, Plaintiff has neither obtained, nor are the Defaulted Defendants participating in these proceedings, so that the Court can be provided with the infringers' deductible expenses related to the sale of the counterfeit products associated with the unauthorized use and display of the company's Copyright Protected Images. *See* 17 U.S.C. § 504(b). As such, there is no verifiable information concerning the Defaulted Defendants' gross infringing sales of their knockoff products or the associated deductible expenses from same. (Mangano Decl. ¶ 7.) Moreover, while Plaintiff can estimate the range of the Defaulted Defendants' net profits from their infringing sales, this estimate is highly speculative and cannot affirmatively account for the advertising expenses saved through the unauthorized use and display of the company's Copyright Protected Images for which it has created at considerable expense. (Li Decl. ¶ 11.) Accordingly, an award of statutory damages is appropriate because actual damages are "virtually impossible to prove . . ." in this case. *See White*, 771 F.Supp.2d at 956.

Given the foregoing circumstances, and the nature of the Defaulted Defendants' conduct, Plaintiff asserts that it is entitled to an award of statutory damages in the amount of \$5,000.00 per Defaulted Defendant per infringed Copyright Protected Image in this action. (Mangano Decl. ¶ 12, Ex. 1.) First, the Defaulted Defendants were provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend, which resulted in the Court ordering Entry of Clerk's Default against them. [Dkt. No. 41.] As a result of the Defaulted Defendants' intentional decision not to appear and defend this action, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual damages. (Mangano Decl. ¶ 7.) Moreover, Plaintiff has expended considerable capital in securing registration of the Copyright Protected Images and advertising its brand in the United States and in the State of Illinois. (Li Decl. ¶ 10.) This includes spending over \$80,000 to secure the company's copyright registrations

with the United States Copyright Office and spending approximately \$8,000,000 to \$12,000,000 annually to advertise and promote its Rotita brand in the United States. (Li Decl. ¶ 10.) These facts unquestionably support Plaintiff's request for an award of \$5,000.00 in statutory damages per infringed Copyright Protected Image per Defaulted Defendant.

Next, the circumstances of the Defaulted Defendants' infringement clearly support awarding the requested statutory damage award against them. It is without question that the Defaulted Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. In this regard, Plaintiff's Copyright Protected Images, often representing recent product releases, have almost instantaneously appeared on the Defaulted Defendants' online stores maintained with the Platform. (Li Decl. ¶ 7.) Moreover, the Defaulted Defendants have unquestionably been operating their online stores using the misappropriated Copyright Protected Images through a sophisticated counterfeit network utilizing a highly developed supply chain capable of supplying thousands of knockoff products featuring an array of Plaintiff's textile patterns and designs that could not otherwise be accomplished on an individual basis. (Mangano Decl. ¶¶ 8, 11.) Accordingly, the Defaulted Defendants unquestionably intentionally, and willfully, infringed Plaintiff's Copyright Protected Images to sell their knockoff products, thereby justifying an award of statutory damages.

Based on the foregoing, Plaintiff respectfully requests the Court award \$5,000.00 in statutory damages against each of the Defaulted Defendants for each infringement of the Copyright Protected Images. As set forth in Plaintiff's supporting documentation, the Defaulted Defendants in this action should be found liable for \$5,000.00 because of their infringements of the Copyright Protected Images. (Mangano Decl. ¶ 12, Ex. 1.) Accordingly, Plaintiff respectfully requests the Court an award of statutory damages for copyright infringement under 17 U.S.C. § 504(c)(1) in an

amount not less than \$5,000.00 per Defaulted Defendant per infringed Copyright Protected Image. (Mangano Decl. ¶ 12, Ex. 1)

***2. Plaintiff is entitled to enhanced statutory damages.***

Next, the circumstances of the Defaulted Defendants' infringement clearly support awarding an enhanced statutory damage award of, at least, treble damages against them. Simply put, the Defaulted Defendants' infringing conduct in this action is unquestionably willful, thereby justifying enhanced damages under 17 U.S.C. § 504(c)(2).

It is without question that the Defaulted Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. (Mangano Decl. ¶¶ 8, 11-12.) In this regard, Plaintiff's Copyright Protected Images, often representing recent product releases, have almost instantaneously appeared on the Defaulted Defendants' online stores maintained with the Platform. (Li Decl. ¶ 7.) Moreover, the Defaulted Defendants have clearly been operating their online stores using the misappropriated Copyright Protected Images through a sophisticated counterfeit network utilizing a highly developed supply chain capable of supplying thousands of knockoff products featuring an array of Plaintiff's textile patterns and designs that could not otherwise be accomplished on an individual basis. (Mangano Decl. ¶¶ 8, 11-12.)

In addition, defendants in multiple copyright enforcement actions in this judicial district, which includes the Defaulted Defendants, have been acting through their counterfeit network to actively monitor and post information on the Plaintiff's pending cases on the website [www.SellerDefense.cn](http://www.SellerDefense.cn). (Mangano Decl. ¶ 8.) This has apparently been done to advise defendants in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. (*Id.*) These circumstances reveal an overall strategy by all non-appearing defendants, including the Defaulted Defendants, to simply cut their losses where

Plaintiff has a high likelihood of success, abandon any online platform restrained funds, and bask in the security that any judgment issued against them will almost certainly not be collectable in the Republic of China. (Mangano Decl. ¶ 8.) Such circumstances support awarding Plaintiff enhanced statutory damages in this action. *See Chi-Boy Music*, 930 F.2d at 1229.

The facts presented further support awarding the enhanced statutory damages against the Defaulted Defendants on the grounds that they should serve as a deterrent to future conduct. *Id.* at 1229-30. Simply put, the Defaulted Defendants are watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Mangano Decl. ¶ 8.) At first, all named defendants in Plaintiff's copyright enforcement actions would vigorously fight the allegations against them until Judge Kennelly issued a preliminary injunction in Plaintiff's favor after a highly contested in-person hearing, which has resulted the Defaulted Defendants, and defendants in other pending actions commenced by Plaintiff, electing not to appear and defend. (*Id.* ¶ 9.) Simply put, the Defaulted Defendants, as with other similarly situated defendants, have simply taken the apparent position that any recovery issued by a court is only executable against their restrained asserts on the named online platform. (*Id.*) This conduct demonstrates an intentional wiliness to ignore the Court's authority to impose significant statutory damages in this action to send a message to the Defaulted Defendants, and all other similar infringers, that they will incur substantial liability for their actions. In doing so, hopefully the Defaulted Defendants, or other similar infringers monitoring this case, will post this anticipated reward on the [www.SellersDefense.cn](http://www.SellersDefense.cn) website as notice of the consequences for their intentional, and orchestrated actions.

Based on the foregoing, Plaintiff respectfully requests the Court award enhanced statutory damages of not less than treble the requested statutory damages of \$5,000.00 per Defaulted

Defendant per infringed Copyright Protected Work, which represents an award of \$15,000.00 for each Defaulted Defendant per infringed work. As set forth in Plaintiff's supporting documentation, the Defaulted Defendants in this action should be found liable for \$15,000 each because of their willful infringement for each of the three (3) Copyright Protected Images. (Mangano Decl. ¶ 12, Ex. 1) Accordingly, Plaintiff respectfully requests the Court enter an award of \$5,000.00 in statutory damages per Defaulted Defendant per infringed Copyright Protected Image, which should be enhanced for willful infringement to \$15,000.00 per Defaulted Defendant per infringed Copyright Protected Work, pursuant to 17 U.S.C. § 504(c)(2).

***3. Plaintiff is entitled to a permanent injunction.***

Next, Plaintiff is entitled to entry of a permanent injunction against the Defaulted Defendants. This request is justified under either 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3.

First, the Court has already determined that Plaintiff is entitled to preliminary injunctive relief in this action, which includes issuance against the Defaulted Defendants. [Dkt. No. 35.] Nothing has occurred since entry of the preliminary injunction that would alter or prohibit entry of a permanent injunction against the non-appearing Defaulted Defendants. In short, the compelling fact presented to the Court that justified entry of preliminary injunctive relief stand unchallenged by the Defaulted Defendants and, subsequently, their right to appear and contest this decision has been cut-off by entry of default. [Dkt. No. 41.] As such, Plaintiff's right to permanent injunctive relief under 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3, is uncontested and supported by the substantial evidentiary record previously provided to the Court when preliminary injunctive relief was issued.

Accordingly, Plaintiff is entitled to issuance of permanent injunctive relief against the Defaulted Defendants.

***4. Plaintiff is entitled to an award of attorneys' fees and costs.***

Plaintiff is also entitled to an award of attorneys' fees and costs against the Defaulted Defendants. Such relief should be granted pending Plaintiff moving the Court for a specific award pursuant to its submission of a "Fee Award" pursuant to LR 54.3.

Plaintiff's request for an award of attorneys' fees and costs is two-fold. First, such an award is warranted based on issuance of enhanced statutory damages based on the Defaulted Defendants' willful infringement of the company's Copyright Protected Images. *See* 17 U.S.C. § 505. Second, and alternatively, Plaintiff is entitled to an award of attorneys' fees and costs based on the Defaulted Defendants' willful violation of the Uniform Deceptive Trade Practices Act. *See* 815 ILCS § 510/3. Under either statutory provision, the facts presented clearly justify the willful infringement and violation of Plaintiff's federally secured rights in and to the Copyright Protected Images, which have been done to deceive the consuming public. (Mangano Decl. ¶¶ 8, 11-12.) Accordingly, Plaintiff is entitled to an award of attorneys' fees and costs, subject to the company filing a "Fee Award" pursuant to LR 54.3

**III. CONCLUSION**

Based on the foregoing, Plaintiff respectfully request entry of default judgment against the Defaulted Defendants pursuant to Rule 55(b)(2). In granting its request, Plaintiff asks the Court to award the following: (1) statutory damages in the amount of \$5,000.00 per Defaulted Defendant per infringed Copyright Protected Image pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced statutory damages of \$15,000.00 per Defaulted Defendant per infringed Copyright Protected Image based on their willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) issuance of a permanent

injunction against the Defaulted Defendants pursuant to 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3; (4) an award of attorneys' fees and costs pursuant 17 U.S.C. § 505 and/or 815 ILCS § 510/3 based on the Defaulted Defendants' willful conduct in an amount to be determined upon submission of a "Fee Award" under LR 54.3; and (5) such other relief as the Court deems just and proper.

DATED: January 6, 2025

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Il Bar No. 6299408)

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Henderson, NV 89014

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*Attorneys for Plaintiff*



**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th 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. 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.

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Il Bar No. 6299408)

No.	Seller	Seller's Contact Information
1	<b>AiClothes Store</b> <b>Fuzhou Huijia Real Estate Agency Co., Ltd.</b> Member ID: cn1543412942ncdm Shop ID: 1101854726	n18559789751@163.com
2	<b>AILSIN Store and Shop910458077 Store</b> <b>Shenzhen Aoersheng Technology Co., Ltd</b> Member ID: cn1530005853nmvf Shop ID: 1101522401	597543925@qq.com
3	<b>Aprmhisyl Girl Store and Aprmhisyl Official Store</b> <b>Hefei Yan Yao Trading ZCo., Ltd</b> Member ID: cn1520072688xpyc Shop ID: 1101241718 Member ID: cn1524128933deyb Shop ID: 1101419628	3559744802@qq.com 2163845712@qq.com
4	<b>ASHIOFU Official Store</b> <b>Chengdu wedding clothes guest Technology Co., LTD</b> Member ID: cn1529950953vgjk Shop ID: 1101370208	vip@zandina.com
5	<b>AWM Store</b> <b>Shenzhen Haoyixin Technology Co., Ltd.</b> Member ID: cn1527900631lmgx Shop ID: 1101326530	smthaoyixin1@sina.com

No.	Seller	Seller's Contact Information
6	<b>Bessmini Apparel Store</b> <b>Guangzhou Dehengtong Electronic Commerce Co., Ltd.</b> Member ID: cn1538978251jzix Shop ID: 1101777405	xuwang50178@aliyun.com
10	<b>BX Groceries Store and July Loving Store and June Balala Store</b> <b>Shenzhen Qianhai Haiyi Industrial Co., Ltd.</b> Member ID: cn1529031398uuhz Shop ID: 1101350434 Member ID: cn1529013995yimh Shop ID: 1101349081 Member ID: cn1529030855bjqv Shop ID: 1101349763	smtqhhysy37@163.com smtqhhysy23@163.com smtqhhysy27@163.com
11	<b>COIN 78 Store</b> <b>Qianshan County Changheng Electronic Commerce Co., Ltd.</b> Member ID: cn1077795006cczae Shop ID: 1103318221	changxinfo006@163.com
13	<b>Day To Day shopping</b> <b>Shenzhen Arke Technology Co., Ltd.</b> Member ID: cn1513954205 Shop ID: 1101091564	suhongxia201516@163.com
14	<b>DilaFashion Store</b> <b>Shenzhen Yousheng Technology Co.</b> Member ID: cn1540504355iehc Shop ID: 1101648024	smtysjsyxgs6@163.com
15	<b>Doge Watches &amp; Clothes Store</b> <b>Shenzhen upper string Trading Co Ltd</b> Member ID: cn1513528805 Shop ID: 1101061720	lilanlilll3@163.com
16	<b>doitgood Store</b> <b>Shenzhen Liansheng Hong Trading Co., Ltd.</b> Member ID: cn1527411160fsac Shop ID: 1101319551	womenc1886@163.com
17	<b>Dopamine clothing Store</b> <b>Changsha Ran Jiuju Trading Co., Ltd.</b> Member ID: cn1075680480mkoae Shop ID: 1102878165	smtjiuplvbya1@163.com
18	<b>Doremo Sexy Club Store</b> <b>Yiwu fishing fire Trade Co., LTD</b> Member ID: cn1520296810lldc Shop ID: 1101407384	yuhuomaoyi5@163.com

No.	Seller	Seller's Contact Information
19	<b>EbadiahChoice Store and MalachiApparel Store Shenzhen Strauss Garment Co., Ltd</b> Member ID: cn1541372252jbuv Shop ID: 1101742232 Member ID: cn1535885235bvwi Shop ID: 1101564390	ebadiahchoice@163.com malachi20000603@aliyun.com
20	<b>EFG Clothes Store Guangzhou Lian Nashuo Trading Co., Ltd.</b> Member ID: cn1544918611evvr Shop ID: 1101924830	smtlnssmyxgs3@163.com
21	<b>Enjoy Dream Store and FAIRY SEASON Official Store Shenzhen Haicheng Electronic Commerce Co., Ltd</b> Member ID: cn1064208199zwqae Shop ID: 1102133998 Member ID: cn1001997391zvuae Shop ID: 1102040457	Preoccupy@21cn.com DeepBlueSea@21cn.com
22	<b>facyuny Store and MORCH Store Fuzhou Yichuang Times Network Technology Co., Ltd.</b> Member ID: cn1540500882kmyc Shop ID: 1101652264 Member ID: cn1063057757fqrae Shop ID: 1102062859	baodan8880618@163.com joom888666@163.com
23	<b>Fashion Sexy Girl Store Dongshan Shijun Electric Appliance Store, Maitreya City</b> Member ID: cn1533892129mqqq Shop ID: 1101540256	smy18810380811@163.com
24	<b>Felyn Boutique 2 Store and Felyn Boutique Store Shop5584234 Store Zhangzhou Longwen District Yino Trading Co., Ltd.</b> Member ID: cn1531556843bjxs Shop ID: 1101763766	yinuomaoyi2020@hotmail.com
26	<b>Hotsell Factory Store, HaiN 99 Store and Shop5115029 Store Dongguan Seabird Electronic Commerce Co., Ltd.</b> Member ID: cn1528816449omjr Shop ID: 1101343172 Member ID: cn1520928329apkj Shop ID: 1101262262	810515526@qq.com
27	<b>HWSTLE Store Quanzhou Lanxin Electronic Commerce Co., Ltd.</b> Member ID: cn1077075111rcfae Shop ID: 1103068335	lanxmy@163.com

No.	Seller	Seller's Contact Information
29	<b>ICC Clothes Store</b> <b>Shenzhen Feijan Industrial Development Co., Ltd</b> Member ID: cn1535231137vkpo Shop ID: 1101615559	szfeijian1904@163.com
30	<b>Insvery Store</b> <b>Guangzhou Suxiao Network Technology Co., Ltd.</b> Member ID: cn1541602737mhqd Shop ID: 1101767016	suxiao7864@163.com
31	<b>Kliiou Store Twenty-three (Shenzhen) Electronic Commerce Co., Ltd.</b> Member ID: cn1541886798tksl Shop ID: 1101773598	2251667102@qq.com
33	<b>LDLC Store and WELOVE GOOD Store</b> <b>Changsha Dianao Trading Co., Ltd.</b> Member ID: cn1069272665tplae Shop ID: 1102277721 Member ID: cn1069272653pvmae Shop ID: 1102279642	smtdnsmyxgs2@163.com smtdnsmyxgs1@163.com
35	<b>Lucy Garment Factory Store</b> <b>Shenzhen Tianyu Technology Co., Ltd.</b> Member ID: cn1541524184cslx Shop ID: 1101752524	smttyhkjyxgs1@163.com
36	<b>Matteobenni Store and MatteobenniFly Store</b> <b>Guangzhou Meiwa Electronic Commerce Co., Ltd.</b> Member ID: cn1516574079ipng Shop ID: 1101192231 Member ID: cn1520074147bqih Shop ID: 1101241995	smt99178@sina.com matteobenni888@sina.com
39	<b>Men and women clothes Store</b> <b>Shenzhen Shenmeida Clothing Co., Ltd.</b> Member ID: cn1539366224upkn Shop ID: 1101610359	smtshenmeida1@163.com
40	<b>Milo Girl Store Qianshan County Xiubei Electronic Commerce Co., Ltd.</b> Member ID: cn1521664151rdak Shop ID: 1101274283	flovebei99@126.com
42	<b>Mo Rou Ni Store</b> <b>Jinjiang Lingyuan Ke Qingbiao Clothing Store</b> Member ID: cn1540824425oqol Shop ID: 1101710995	3321946889@qq.com
43	<b>MOOCLUND Store</b> <b>Changzhou Guomu Clothing Co., Ltd.</b> Member ID: cn1523766504lvrh Shop ID: 1101418771	1334569135@qq.com

No.	Seller	Seller's Contact Information
44	<b>My friend ya Store</b> <b>Shenzhen Meihoujia Electronic Commerce Co., Ltd.</b> Member ID: cn1520251155eqah Shop ID: 1101248419	stijuys@sina.com
45	<b>Niwaaa StoreLuofei Rain Department Store, Nanhai District, Foshan City</b> Member ID: cn1542312995mnda Shop ID: 1101794042	geojier14@163.com
46	<b>Nothing to Lose Dropshipping Store</b> <b>Shenzhen Hongba Yi Electronic Information Co., Ltd.</b> Member ID: cn1540636293tpxs Shop ID: 1101708263	smthbydzyxgs5@163.com
47	<b>RETURN SELF Store SHENZHEN YE TRADING TECHNOLOGY CO., LTD</b> Member ID: cn1539055143rfgn Shop ID: 1101608356	smtuyuyemaoyi5@163.com
49	<b>Safty Life Store Shenzhen Jihuahe Electronic Commerce Co., Ltd.</b> Member ID: cn1541319779nxzz Shop ID: 1101987071	xiongdal1122@163.com
50	<b>Shop1100087213 Store</b> <b>Guangzhou Xiaojun Trading Co., Ltd</b> Member ID: cn1529022288xkaw Shop ID: 1101985003	x6iaojunmaoyi@outlook.com
51	<b>Shop1102858077 Store and Women Fashion Clothes Putian Jiequan Information Technology Co., Ltd.</b> Member ID: cn1075704106kigae Shop ID: 1102861017 Member ID: cn1075274470azdae Shop ID: 1102853933	kcuai6@163.com jiwoguai19640816@163.com
53	<b>Shop45692467 Store</b> <b>Guangzhou Jiansui Rui Trading Co., Ltd.</b> Member ID: cn1543890080nkby Shop ID: 1101940315	zijunstore1@163.com
54	<b>Shop911128014 Store</b> <b>SHENZHEN FU HENG ELECTRONICS CO., LTD</b> Member ID: cn1533859812fick Shop ID: 1101577502	qimengstore5@163.com
55	<b>Shop911750699 Store</b> <b>Shenzhen Mijia Technology Co., Ltd</b> Member ID: cn1541050838gcmo Shop ID: 1101693682	elijah2one@163.com

No.	Seller	Seller's Contact Information
56	<b>Suancai Store</b> <b>Hefei Xiaohan Electronic Commerce Co., Ltd.</b> Member ID: cn1542242644cbpj Shop ID: 1101785790	lidandan_20202021@163.com
57	<b>Sweet Life Store</b> <b>Xiamen city fire gull Trading Co Ltd</b> Member ID: cn1072275936pdcae Shop ID: 1102546365	huangjg1994@163.com
58	<b>Tao Tao Yi Store</b> <b>Guangzhou Guigerian Trading Co., Ltd.</b> Member ID: cn1544902763emws Shop ID: 1101924815	smtgglsmyxgs1@163.com
59	<b>Toplle Store</b> <b>Qianhao Electronic Commerce (Shenzhen) Co., Ltd.</b> Member ID: cn1543058094pfap Shop ID: 1101841879	1251243716@qq.com
61	<b>Unique Frost Store</b> <b>Guangzhou Feirui Fan Trading Co., Ltd.</b> Member ID: cn1544748101xacc Shop ID: 1101913315	smtfyfsmxgs5@163.com
62	<b>Variety girl-Store Guangzhou Darwin Cross-border E-Commerce Co., Ltd.</b> Member ID: cn1538918611lddm Shop ID: 1101599870	s18810380811@163.com
63	<b>Wenclothes Store</b> <b>Quanzhou Changge Trading Co., Ltd.</b> Member ID: cn1542486763fmmh Shop ID: 1101827052	y18650115940@163.com
65	<b>Xinceng Store</b> <b>Dongguan Kangya Electronic Technology Co., Ltd.</b> Member ID: cn1537258503skgg Shop ID: 1101564200	405121607@qq.com
66	<b>YangYang Baby Store</b> <b>Shenzhen Yiping Garment Co., Ltd</b> Member ID: cn1521331244rovx Shop ID: 1101322668	drakeyy@163.com
67	<b>YESSS Store</b> <b>Shenzhen Baoan District Guozhier Clothing Firm</b> Member ID: cn1538477194dhrr Shop ID: 1101599098	geojier2020@163.com
68	<b>Yezekiel2First Store</b> <b>Shenzhen Dianyu Garment Co., Ltd</b> Member ID: cn1070907803yykae Shop ID: 1102346242	yezekiel2first@163.com

No.	Seller	Seller's Contact Information
70	<b>yizhanggui Store</b> <b>Shangrao Yufei Clothing Management Co., Ltd.</b> Member ID: cn1540495219ejeh Shop ID: 1101659656	fujiwei0818@sina.com
71	<b>YoulikeAll Store</b> <b>LIUZHOU MANAGER TRADING CO., LTD</b> Member ID: cn1533630128lxhv Shop ID: 1101510896	liumange665@163.com
75	<b>YY Beautiful Clothes Store</b> <b>Maitrya City Department Store Yesterday</b> Member ID: cn1544917454gnmg Shop ID: 1102773847	U18810380811@163.com
78	<b>ZZ-Clothing Store</b> Member ID: cn1542432070wlxk Shop ID: 1101794249	e18810380811@163.com
79	<b>7-A girl Store</b> Luohe 24 o'clock Electronic Commerce Co., Ltd Member ID: cn1521761482rhir Shop ID: 1101415574	970438769@qq.com
80	<b>A Lin Clothing Store A Lin Clothing Store in Zhongyuan District of Zhengzhou City</b> Member ID: cn1073280039jrwa Shop ID: 1102666101	alin519611@gmail.com
81	<b>A woman's Wardrobe Qianshan County Yiyang Electronic Commerce Co., Ltd.</b> Member ID: cn1077434989puuae Shop ID: 1103307249	254383704@qq.com
82	<b>AEY168 Store</b> <b>Yiwu Yan Can Trading Co., Ltd.</b> Member ID: cn1545324980hmln Shop ID: 1101940077	luoan1688@gmail.com
83	<b>Affya women Store</b> <b>Shanghai zucan tree Trading Co Ltd</b> Member ID: cn1532967531vtdz Shop ID: 1101403944	1542431466@qq.com
84	<b>Aicoinshan889 Store Shenzhen Xinhui Chengxin Information technology Co., Ltd.</b> Member ID: cn1521728826rhex Shop ID: 1101298752	aicoinshan@163.com
85	<b>angela fufu Store</b> <b>Shishi City Fumin Longhe Trading Co., Ltd.</b> Member ID: cn1513955527 Shop ID: 1101471076	cgf520lyl@163.com

No.	Seller	Seller's Contact Information
87	<b>Baby A Toys Store</b> <b>Wuhan Yuchengwei Electronic Commerce Co., Ltd.</b> Member ID: cn1539954907bcbp Shop ID: 1101953151	yuchwei06@163.com
88	<b>Beautiful day Dropshipping Store</b> <b>Shenzhen Kaifa Chang Export Trade Co., Ltd.</b> Member ID: cn1540803054ggkz Shop ID: 1101703425	smtkfckyxgs2@163.com
89	<b>Besley &amp; Halpert Store</b> <b>Shenzhen Linlang Jiapin Trading Co., Ltd.</b> Member ID: cn1523985140slhl Shop ID: 1101423754	smlmorrl05@163.com
90	<b>Black cat shop Store</b> <b>Shantou city success Logistics Co Ltd</b> Member ID: cn1060586096puuae Shop ID: 1102023052	909151124@qq.com
91	<b>Botvotee Chic Store</b> <b>Dongguan Humen Dahai Clothing Store</b> Member ID: cn1003173676dboae Shop ID: 1102033768	dahai fushi06@163.com
92	<b>CharmingFashion Store</b> <b>Xiamen Ousikai ElectronicS Technology Co., Ltd.</b> Member ID: cn1531759050uyet Shop ID: 1101397501	xmosk122@163.com
93	<b>Cozok Girl Store</b> <b>Shenzhen China Hesheng Trading Co., Ltd.</b> Member ID: cn1074961474jkgae Shop ID: 1102724219	leofeng1112@163.com
94	<b>Cynthia-Goddess Store</b> <b>Guangzhou Anresen Trading Co., Ltd.</b> Member ID: cn1547023898czil Shop ID: 1101951560	smtalssmyxgs3@163.com
95	<b>Dazzling Styles Store</b> <b>Shenzhen Sifan Electronics Co., Ltd.</b> Member ID: cn1520334167jorn Shop ID: 1101245280	ursulaai@sina.com
96	<b>Diousha Evening Dresses</b> <b>Suzhou Ziyu Butterfly Trading Co., Ltd.</b> Member ID: cn1001131184 Shop ID: 1100505994	875035922@qq.com
97	<b>dropclothes Store</b> <b>Shenzhen Gesheng Technology Co., Ltd</b> Member ID: cn1536277685uijq Shop ID: 1101555759	qq601838264@126.com



No.	Seller	Seller's Contact Information
98	<b>Duzeala Store</b> <b>Suzhou Yixiu Trading Co., Ltd.</b> Member ID: cn1521700119ehbr Shop ID: 1101274820	dwy0210@163.com
99	<b>Elegant Evening Dress Store</b> <b>Hefei Baohe District Quasi Clothing Store</b> Member ID: cn1541031538qfrq Shop ID: 1101757499	tyh1556218638@163.com
100	<b>Evan Co. Ltd</b> <b>Shangrao Haobo Trading Co., Ltd.</b> Member ID: cn1511075620 Shop ID: 1100858376	xuzihao1019@163.com
101	<b>Fabulous Femme Store</b> <b>Hainan Linghe Trading Co Ltd</b> Member ID: cn1074816481xpoae Shop ID: 1102816281	lm18502010391@163.com
102	<b>Girl clothes factory shop Store and HE LIANG SHENG Clothing Store Store</b> Xiamen He Yun He Technology Co., Ltd. Member ID: cn1544965478shvx Shop ID: 1101910575	2671962050@qq.com
103	<b>Gugoods StoreSuzhou preferred good things fElectronic Commerce Co., Ltd.</b> Member ID: cn1524361155ubqm Shop ID: 1101793904	747139370@qq.com
104	<b>Halloween Factory Store</b> <b>Quanzhou Wanen Electronic Commerce Co., Ltd</b> Member ID: cn117597085 Shop ID: 1100828464	instyleswear@gmail.com
105	<b>HAO YUN Store</b> <b>Shangrao Qingzi Clothing Co., Ltd.</b> Member ID: cn1068747969jrtae Shop ID: 1103104074	13353397079@189.cn
106	<b>HGSH Women Garment Store Qingdao Hengguan Senhe Electronic Commerce Co., Ltd.</b> Member ID: cn1074002067vxhae Shop ID: 1102789494	192355680@qq.com
107	<b>Hi 8899 Store Store Dongshan Shijun Electric Appliance Store, Maitreya City</b> Member ID: cn1533834973dewq Shop ID: 1101875706	sxy18810380811@163.com
109	<b>HJ-Wedding Prom Dress</b> <b>Suzhou Heijiao Network Technology Co., Ltd.</b> Member ID: cn1073858433thgae	heijiaokeyi04@163.com

No.	Seller	Seller's Contact Information
	Shop ID: 1102786081	
110	<b>Hopeshow Store</b> <b>Taijiang District Glory Real Estate Agency</b> Member ID: cn1531664180sdum Shop ID: 1101578170	tjqryfc225@163.com
111	<b>huangshi Store</b> <b>Nanyang Zhengtong Electronic Commerce Co., Ltd.</b> Member ID: cn1542441370pdod Shop ID: 1101867402	uder5333@21cn.com
112	<b>huashang Maxi Store</b> <b>Shenzhen beautiful clothing trade Co., LTD</b> Member ID: cn1520848917xcet Shop ID: 1101260685	3076686340@qq.com
113	<b>JinFashionClothesFactory Store</b> <b>Fuzhou Huijia Real Estate Agency Co., Ltd.</b> Member ID: cn1543414861ilen Shop ID: 1101856223	aiyoujin11@sina.com
114	<b>JISSAYES Store</b> <b>Shenzhen TianDebao Technology Co., Ltd.</b> Member ID: cn1078034135peeae Shop ID: 1103441040	3062969689@qq.com
115	<b>Kalenmos Dropshipping Store and Kalenmos World Apparel Store</b> <b>Yiwu Youyun Network Technology Co., Ltd.</b> Member ID: cn1533487559epge Shop ID: 1101494205 Member ID: cn1529195598hvba Shop ID: 1101355860	yywlnetwork3@163.com kalenmos@163.com
116	<b>Le Ning Shang Store</b> <b>Qianshan County Le Ning Shang Clothing Co., Ltd.</b> Member ID: cn1074337110pdiae Shop ID: 1102658390	1298241674@qq.com
117	<b>LULU Women Store</b> <b>Guangshui Kangli Trading Co., Ltd.</b> Member ID: cn1541480313ycap Shop ID: 1101745803	bsrsmt002@163.com
118	<b>Mifafa Store</b> <b>Wuhan Gull Wing Information Consulting Co., Ltd.</b> Member ID: cn1064979414rfiae Shop ID: 1102115793	minglangkeji82@163.com
119	<b>MM Stylish Clothes Store</b> <b>Yiwu ertong e-commerce firm</b>	yimoast@163.com

No.	Seller	Seller's Contact Information
	Member ID: cn1541447384mroe Shop ID: 1101748623	
120	<b>My Naughty Girl Store Ying Ying Department Store, Nanhai District, Foshan City</b> Member ID: cn1070497359sllae Shop ID: 1102127961	caiyingxin02@126.com
121	<b>New Experience Store</b> <b>Quanzhou Yingwei Network Technology Co., Ltd.</b> Member ID: cn1537639538uxsp Shop ID: 1101570904	yingweisumaitong4@163.com
122	<b>QXKJ-1 Store LEDP QX-CTO Whsel Store</b> <b>Wuxi Qingxin Technology Co., Ltd.</b> Member ID: cn1072680886kiyae Shop ID: 1102634347	472747871@qq.com
123	<b>RyansDress Store</b> <b>Guangzhou Nashuo Trading Co., Ltd.</b> Member ID: cn1544985506yhee Shop ID: 1101923522	smtlnssmyxgs6@163.com
124	<b>SASAMINI Store</b> <b>Guangzhou Weituo Electronic Commerce Co., Ltd</b> Member ID: cn1529294269kybh Shop ID: 1101365449	yuanlinstore5@sina.com
125	<b>Sexy Beauty Girl StoreShop1102983689 Store</b> <b>Guangzhou Jingyuan E-Commerce Co., Ltd</b> Member ID: cn1078345144bsuae Shop ID: 1102986671	aq19124355865@163.com
126	<b>SGCHUA Store</b> <b>Xingcheng Pengrong Garment Factory</b> Member ID: cn1529853468lzff Shop ID: 1101367470	sgchua2020@126.com
127	<b>Sheiny Store</b> <b>Shenzhen Xifan Ni Trading Co., Ltd.</b> Member ID: cn1072178760garae Shop ID: 1102551046	sheiny2022@163.com
128	<b>Shop1102089173 Store</b> <b>Guangzhou thick Electronic Technology Co., LTD</b> Member ID: cn1067376224rovae Shop ID: 1102086198	469193398@qq.com
129	<b>Shop1102162304 Store</b> <b>Guangzhou barley International Trading Co Ltd</b> Member ID: cn1068698257okeae Shop ID: 1102152342	826082960@qq.com

No.	Seller	Seller's Contact Information
130	<b>Shop1102699168 Store</b> <b>Shenzhen Gao Fei Feng Trading Co. Ltd.</b> Member ID: cn1074817648pwbae Shop ID: 1102697178	cici19982020@outlook.com
131	<b>Shop1102773971 Store</b> <b>Shanghai Chengshaner Electronic Commerce Co., Ltd.</b> Member ID: cn1073546286fyfae Shop ID: 1102776533	13456975838@163.com
132	<b>Shop1102788842 Store</b> <b>Zhenping Xunkang Trading Co., Ltd.</b> Member ID: cn1074026204oggae Shop ID: 1102788843	aaa376118@sina.com
134	<b>Shop1102989099 Store</b> <b>Zhongshan Chuangxi Electronic Technology Co., Ltd</b> Member ID: cn1076736367liwae Shop ID: 1102983381	zschuangxi03@163.com
135	<b>Shop1103150556 Store</b> <b>Shangrao Tianen Electronic Commerce Co., Ltd.</b> Member ID: cn1077576675jfrae Shop ID: 1103128968	lgl18479339088@qq.com
136	<b>Shop1103183130 Store</b> <b>Zhenping County Guolin Rain Trading Co. Ltd.</b> Member ID: cn1076715480zvvae Shop ID: 1103188117	zhaoyangli20141216@163.com
137	<b>Shop1103478006 Store</b> <b>Pucheng County Bian Yixing Department Store</b> Member ID: cn1078658023hfmae Shop ID: 1103478007	yhepyso865831@163.com
138	<b>Shop2925092 Store</b> <b>Shenzhen Vision Electronic Commerce Co., Ltd.</b> Member ID: cn1520092709jvat Shop ID: 1101248331	kreenda@sina.com
140	<b>Shop4999160 Store</b> <b>Shenzhen Hailihui Electronic Commerce Co., Ltd.</b> Member ID: cn1523914189mvlb Shop ID: 1101434700	hsjdis1@sina.com
141	<b>Shop5017195 Store</b> <b>Foshan Lapa Network Technology Co., Ltd.</b> Member ID: cn1528362530qzix Shop ID: 1101438922	pylmaternity19@163.com
142	<b>Shop5246274 Store</b> <b>Yiwu Shurui Electronic Commerce Co., Ltd.</b> Member ID: cn1529050738ppdl Shop ID: 1101352713	1981327530@qq.com

No.	Seller	Seller's Contact Information
143	<b>Shop5250273 Store and Urban dresses drop (shipping store) Shenzhen Qianhai Haiyi Industrial Co., Ltd.</b> Member ID: cn1529000253wemu Shop ID: 1101351394 Member ID: cn1529030135gqon Shop ID: 1101352726	smtqhhysy36@163.com smtqhhysy29@163.com
144	<b>Shop5870638 Store Qianshan County Ruoxi Clothing Management Co., Ltd.</b> Member ID: cn1533294840jrid Shop ID: 1101504515	srrxdzsw@163.com
145	<b>Shop911345044 Store Changsha Kaijia Jewelry Co., Ltd.</b> Member ID: cn1531572688ysgm Shop ID: 1101605326	lujiangh11@126.com
146	<b>Shop912143244 Store Guangzhou Duo Pin Clothing Co., Ltd.</b> Member ID: cn1542210814cdho Shop ID: 1101787189	shangkou2021@126.com
147	<b>Sishion Retro Store Yiwu Shixun Electronic Commerce Co., Ltd.</b> Member ID: cn1513373863 Shop ID: 1101063200	larryhuang518@outlook.com
148	<b>Stephanie-Sarah Store Qingdao Erxiu Mengchuang Electronic Commerce Co., Ltd.</b> Member ID: cn1077123263cgbae Shop ID: 1103081445	705297942@qq.com
149	<b>Super Sellers Sara Guangzhou Ciran Trading Co., Ltd.</b> Member ID: cn1511782987 Shop ID: 1100953805	alilss@126.com
150	<b>Tokimai Store Shenzhen Explorer Investment Development Co., Ltd.</b> Member ID: cn1538642440bmt Shop ID: 1101591199	tk@fumalon.com
152	<b>Truyee Accessories Co Ltd Store and Tuyee Co Ltd Store Nanchang Xianting Shiqu Electronic Commerce Co., Ltd.</b> Member ID: cn1073953295ksuae Shop ID: 1102457212 Member ID: cn1073929078fdcae Shop ID: 1102459079	xianting1202@126.com xianting1101@126.com
153	<b>Vercareless Store Guangzhou Hongling Technology Co., Ltd</b> Member ID: cn1533668430ymzt	xskjdh004@163.com

No.	Seller	Seller's Contact Information
	Shop ID: 1101683266	
154	<b>Wildcoco Store</b> <b>Beijing Star Daren Technology zCo., Ltd</b> Member ID: cn1542522772afbb Shop ID: 1101820941	kinikiss2021720@163.com
155	<b>Worldwide dropshipping factory store</b> <b>Shenzhen Samuel Trading Co., Ltd</b> Member ID: cn1541201413gijx Shop ID: 1101692894	shenzhensamuer2@126.com
156	<b>WSFEC Fashion Store Jinjiang Dongshi Liu Shaofeng</b> <b>Clothing Business Department</b> Member ID: cn1072058024iovae Shop ID: 1102460251	ab23486262@163.com
157	<b>WXM Clothes Store</b> <b>Wuhan Yaxunchi Trading Co., Ltd.</b> Member ID: cn1074819091tgiae Shop ID: 1102942557	yaxunchi01@163.com
158	<b>XINDONGYI Store</b> <b>Shenzhen Dongxin Trading Co., Ltd</b> Member ID: cn1529118664exla Shop ID: 1101355580	xindongyi123@sina.com
159	<b>Y-GEOJIEER Store</b> <b>Foshan Nanhai District Yonoi Clothing Store</b> Member ID: cn1541320443jecu Shop ID: 1101718455	geojier11@163.com
160	<b>Yi Xian Baby Store</b> <b>Shenzhen Fengqi Trading Co., Ltd.</b> Member ID: cn1510144128 Shop ID: 1100737568	sbw1387@163.com
161	<b>youly Store</b> Member ID: cn1519979332bvvd Shop ID: 1101239923	654586047@qq.com
162	<b>Your Magical Wardrobe Store</b> Member ID: cn1524355517kwel Shop ID: 1101300716	bsmisy@163.com
163	<b>YUCHENGRUNDA Garment Store and YUCHRUDA</b> <b>Garment Store Store Qingdao Youcheng Runda</b> <b>Industry and Trade Co., Ltd.</b> Member ID: cn1058043757iirae Shop ID: 1102036298 Member ID: cn1058067275khzae Shop ID: 1101991348	2197149741@qq.com 2287711092@qq.com

No.	Seller	Seller's Contact Information
164	<b>Zoetuo Official Store Shop5361030 Store</b> <b>Guangzhou Xinyi Bamboo Garment Co., Ltd.</b> Member ID: cn1529019613khau Shop ID: 1101355567	xyz18027451119@163.com
165	<b>ZYBELLE Store</b> <b>Shenzhen Ligan Port Ask Technology Co., Ltd.</b> Member ID: cn1541243673yjhi Shop ID: 1101708717	smtlqgwkjyxgs5@163.com
166	<b>Zztrace 1009 Store</b> <b>Qionghai Zhusuo Trading Co., Ltd.</b> Member ID: cn1072011647ptdae Shop ID: 1102455550	huangmijiao71@163.com
167	<b>B-52Gluehwein Store</b> <b>Guangzhou feizhan dream Trading Co., LTD</b> Member ID: cn1546870751hhgi Shop ID: 1101954870	smtfzmsmyxgs6@163.com
168	<b>Dropshipping Shenzhen China Clothes Store</b> <b>Shenzhen Blue Valley Network Technology Co., Ltd.</b> Member ID: cn1542607270pkio Shop ID: 1101820629	smtlgdwlyxgs1@163.com
169	<b>Fashion Yuer Store</b> <b>Shangrao Longqiao Clothing Co., Ltd.</b> Member ID: cn1077841161szrae Shop ID: 1102907498	2621744547@qq.com
170	<b>FENGDAO Store</b> <b>Zhuzhou Elan Trading Co., Ltd.</b> Member ID: cn1528096749mmoi Shop ID: 1101436497	fengdaofa@outlook.com
171	<b>Invincible-Move forward -Never give up Store</b> <b>Shenzhen Pengpeng Square Technology Co., Ltd.</b> Member ID: cn1513837582 Shop ID: 1101098975	qiujinhaiqjh214@163.com
172	<b>Naina Store</b> <b>Guangzhou Naina International Trade Co Ltd</b> Member ID: cn1542563430rrfz Shop ID: 1101808094	1971553914@qq.com
173	<b>NavOra Girl Store</b> <b>Shenzhen Qicheng Electronic Commerce Co., Ltd.</b> Member ID: cn1061160087okvae Shop ID: 1102023978	joyousehome01@126.com
174	<b>Plus Size Swimwear Store</b> <b>Guangzhou Huanshang Clothing Co., Ltd</b> Member ID: cn1001476267 Shop ID: 1102044468	429690045@qq.com



No.	Seller	Seller's Contact Information
175	<b>POSH YLSHEN Official Store</b> <b>Shenzhen Yusheng Trading Co., Ltd.</b> Member ID: cn1528098384deoq Shop ID: 1101436860	e-sales- wendy@hotmail.com
176	<b>QNPQYX Official Store</b> <b>Nanchang Qingniao Electronic Commerce Co., Ltd.</b> Member ID: cn1528936101cbvo Shop ID: 1101447008	844334940@qq.com
177	<b>Secret Swimsuit Store</b> <b>Xuchang Lewo Trading Co., Ltd.</b> Member ID: cn1519532189yuzq Shop ID: 1101226930	xuchanglewo@sina.com
178	<b>Shop1103432206 Store</b> <b>Fuzhou Yunying trading Co., Ltd.</b> Member ID: cn1080649065vriae Shop ID: 1103432207	daisy@mylacesfactory.com
179	<b>Shop5242088 Store</b> <b>Qintian Yiwu Sihai Electronic Commerce Co., Ltd.</b> Member ID: cn1527247982ntoa Shop ID: 1101348813	345awen5@sina.com
180	<b>SL-TX24 Store Jinshan Wensilong Garment Firm, Cangshan District, Fuzhou City</b> Member ID: cn1068864264loyae Shop ID: 1103331584	caiyulintx24@163.com
181	<b>They should belong to you Store</b> <b>Shenzhen Xingli Trading Co., Ltd</b> Member ID: cn1539591263imuy Shop ID: 1101618790	smtxlsmyxgs5@163.com
182	<b>VAZN Official Store</b> Member ID: cn1528967888bymo Shop ID: 1101347530	fanximaoyi2027@hotmail.com
183	<b>VogueU Store</b> <b>Jianyang Mupiao Department Store</b> Member ID: cn1539771837bzaz Shop ID: 1101631360	qingte957@163.com
184	<b>Waterarea Store</b> <b>Xiamen Mingqi Electronic Commerce Co., Ltd.</b> Member ID: cn1529216861ysdp Shop ID: 1101355198	liucm0125@163.com
185	<b>Wildgeeker Store</b> <b>Xi'an Chaogou Information Technology Co., Ltd.</b> Member ID: cn1518048534upmh Shop ID: 1101204438	alibuy@thumbaby.com



No.	Seller	Seller's Contact Information
186	<b>X Tao Store Store</b> <b>Qianshan County Le Ning Shang Clothing Co., Ltd.</b> Member ID: cn1077771220nzgae Shop ID: 1103316275	3665232783@qq.com
187	<b>XXOwen Li Store Shangrao Ouzi Thousand Clothing Management Co., Ltd.</b> Member ID: cn1541335980edus Shop ID: 1101709082	color8888@aliyun.com
188	<b>zhong qiu Store</b> <b>Shangrao Aifeng Clothing Co., Ltd.</b> Member ID: cn1542560224stzi Shop ID: 1101817512	15270383056@139.com

**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-03191-VMK-GAF**

Honorable Chief Judge Virginia M. Kendall  
Magistrate Gabriel A. Fuentes

HEARING DATE: January 14, 2025  
HEARING TIME: 9:30 A.M.  
COURTROOM: 2541

**DECLARATION OF SHAWN A. MANGANO IN SUPPORT OF  
MOTION FOR DEFAULT JUDGMENT**

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 Default Judgment against the one hundred and sixty-two (162) non-appearing Defendants Identified in Schedule “A” (the “Motion”) which this Court has previously granted Entry of Clerk’s Default on September 10, 2024 [Dkt. No. 41] against said Defendants (the “Defaulted Defendants”).

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 lead counsel 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 Defaulted Defendants (as defined in the accompanying Memorandum) have failed to plead or otherwise defend this action within the allotted time in violation of Federal Rule of Civil Procedure 12(a)(1)(A). As a result, the Court ordered Entry of Clerk's Default on September 10, 2024 against the Defaulted Defendants. [Dkt. No. 41.] Accordingly, the Defaulted Defendants are deemed liable to Plaintiff for its asserted claims for relief for Copyright Infringement (Count I), False Designation of Origin under 35 U.S.C. §1125(a) (Count II), and violation of the Illinois Uniform Deceptive Trade Practices Act (the "Uniform Deceptive Trade Practices Act") (Count III). [Dkt. No. 1 at 8-13.]

5. Plaintiff's asserted claims for relief in this action involve the intentional, willful infringement of the following three (3) federally registered copyright protected images: (1) VA0002379907; (2) VA0002379881; and (3) VA0002379893 (the "Copyright Protected Images").

6. As alleged in the Complaint, the Defaulted Defendants have displayed, without authorization, the Copyright Protected Images on the AliExpress.com online sales platform (the "Platform") to market and sell knockoff, counterfeit products resembling Plaintiff's authentic Rotita brand products through their online stores (the "Online Stores"), thereby deceiving public consumers as to the quality, nature, and source of goods being purchased.

7. Plaintiff is entitled to a statutory damage award of \$5,000.00 per Defaulted Defendant per infringed Copyright Protected Image in this action. First, the Defaulted Defendants were provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend, which resulted in the Court ordering Entry of Clerk's Default against them. [Dkt. No. 41.] As a result of the Defaulted Defendants' intentional decision not to appear and defend this action, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual

damages. This uncertainty supports Plaintiff's requested statutory damages against the Defaulted Defendants.

8. In addition, defendants in multiple copyright enforcement actions in this judicial district, which includes the Defaulted Defendants, have been acting through their counterfeit network to actively monitor and post information on the Plaintiff's pending cases on the website [www.SellerDefense.cn](http://www.SellerDefense.cn). This has apparently been done to advise defendants in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. These circumstances reveal an overall strategy by all non-appearing defendants, including the Defaulted Defendants, to simply cut their losses where Plaintiff has a high likelihood of success, abandon any online platform restrained funds, and bask in the security that any judgment issued against them will almost certainly not be collectable in the Republic of China. Simply put, the Defaulted Defendants are watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district.

9. At first, all named defendants in Plaintiff's copyright enforcement actions would vigorously fight the allegations against them, which resulted in Judge Kennelly in a parallel copyright enforcement action brought by Plaintiff concerning a similar online sales platform that he felt compelled to set an in person hearing on the company's request for a preliminary injunction because "this Court had never seen the number of filings by opposing counsel in any other Schedule 'A' case before him." *Hong Kong Leyuzhen Technology Co. Ltd. v. The Partnerships*, Case No. 1:24-cv-02939-MFK-BWJ [Dkt. No. 80]. Oral argument in that case was handled exclusively by Joseph Droter, Esq. Since Plaintiff prevailed in obtaining preliminary injunctive relief in its case pending before Judge Kennelly, the named Schedule "A" defendants in other pending actions have either elected to settle or, as with the Defaulted Defendants, simply failed to

appear and have apparently taken the position that any recovery issued by a court is only executable against their restrained asserts on the named online platform.

10. To maximize the deterrent effect of the Court's anticipated default judgment, Plaintiff is asking that statutory damages be imposed on each individual Defaulted Defendant for each alleged infringement of the Copyright Protected Images. Such an award precludes the Defaulted Defendants from shielding themselves from monetary responsibility for the collective infringement of common Copyright Protected Images. *Desire, LLC v. Manna Textiles, Inc.*, 986 F.3d 1253, 1264-1272 (9th Cir. 2021). Rather, Plaintiff expressly requests that each of the Defaulted Defendants, individually, be assessed a statutory damage award of \$5,000 for their infringement of the Copyright Protected Images.

11. Plaintiff has alleged, and has offered proof, that the Defaulted Defendants have not only engaged in the infringement of the Copyright Protected Images, but they have done so through a highly sophisticated counterfeit network. Moreover, the basic nature of the copyright infringement scheme employed demonstrates that the Defaulted Defendants not only knew of the impropriety of their conduct but had to implement their counterfeit scheme through sophisticated sources and established supply chains. This is the only possible scenario under which the Defaulted Defendants could immediately procure, without authorization, Plaintiff's new copyright protected product images and offer them for sale through their online stores.

12. The presented facts not only establish the Defaulted Defendants' knowledge and intentional infringement of Plaintiff's Copyright Protected Images. Accordingly, Plaintiff should be awarded statutory damages in the amount of \$5,000 with treble the enhancement to \$15,000 per Defaulted Defendant per infringed work based their willful infringement of the Copyright Protected Images. Attached hereto as Exhibit "1" is a chart listing all Defaulted Defendants, the

infringed Copyright Protected Image, the statutory damage amount requested per infringement, and the amount requested based on the Defaulted Defendant's willful infringement.

13. My office, with assistance from our client and those assisting our client, investigated the infringing activities of the Defaulted Defendants, including attempting to identify their contact information. Our investigation confirmed that the Defaulted Defendants are primarily domiciled in Asia. As such, I am informed and believe that the Defaulted Defendants are not active-duty members of the U.S. armed forces.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: January 6, 2025

By: /s/ Shawn A. Mangano  
Shawn A. Mangano, Esq.  
**BAYRAMOGLU LAW OFFICES LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 6th 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. 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.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (Il Bar No. 6299408)

No.	Seller	Seller's Contact Information
1	<b>AiClothes Store</b> <b>Fuzhou Huijia Real Estate Agency Co., Ltd.</b> Member ID: cn1543412942ncdm Shop ID: 1101854726	n18559789751@163.com
2	<b>AILSIN Store and Shop910458077 Store</b> <b>Shenzhen Aoersheng Technology Co., Ltd</b> Member ID: cn1530005853nmvf Shop ID: 1101522401	597543925@qq.com
3	<b>Aprmhisyl Girl Store and Aprmhisyl Official Store</b> <b>Hefei Yan Yao Trading ZCo., Ltd</b> Member ID: cn1520072688xpyc Shop ID: 1101241718 Member ID: cn1524128933deyb Shop ID: 1101419628	3559744802@qq.com 2163845712@qq.com
4	<b>ASHIOFU Official Store</b> <b>Chengdu wedding clothes guest Technology Co., LTD</b> Member ID: cn1529950953vgjk Shop ID: 1101370208	vip@zandina.com
5	<b>AWM Store</b> <b>Shenzhen Haoyixin Technology Co., Ltd.</b> Member ID: cn1527900631lmgx Shop ID: 1101326530	smthaoyixin1@sina.com
6	<b>Bessmini Apparel Store</b> <b>Guangzhou Dehengtong Electronic Commerce Co., Ltd.</b> Member ID: cn1538978251jzix Shop ID: 1101777405	xuwan50178@aliyun.com

No.	Seller	Seller's Contact Information
10	<b>BX Groceries Store and July Loving Store and June Balala Store</b> <b>Shenzhen Qianhai Haiyi Industrial Co., Ltd.</b> Member ID: cn1529031398uuhz Shop ID: 1101350434 Member ID: cn1529013995yimh Shop ID: 1101349081 Member ID: cn1529030855bjqv Shop ID: 1101349763	smtqhhysy37@163.com smtqhhysy23@163.com smtqhhysy27@163.com
11	<b>COIN 78 Store</b> <b>Qianshan County Changheng Electronic Commerce Co., Ltd.</b> Member ID: cn1077795006cczae Shop ID: 1103318221	changxinfo006@163.com
13	<b>Day To Day shopping</b> <b>Shenzhen Arke Technology Co., Ltd.</b> Member ID: cn1513954205 Shop ID: 1101091564	suhongxia201516@163.com
14	<b>DilaFashion Store</b> <b>Shenzhen Yousheng Technology Co.</b> Member ID: cn1540504355iehc Shop ID: 1101648024	smtysjsyxgs6@163.com
15	<b>Doge Watches &amp; Clothes Store</b> <b>Shenzhen upper string Trading Co Ltd</b> Member ID: cn1513528805 Shop ID: 1101061720	lilanlilll3@163.com
16	<b>doitgood Store</b> <b>Shenzhen Liansheng Hong Trading Co., Ltd.</b> Member ID: cn1527411160fsac Shop ID: 1101319551	womenc1886@163.com
17	<b>Dopamine clothing Store</b> <b>Changsha Ran Jiuju Trading Co., Ltd.</b> Member ID: cn1075680480mkoae Shop ID: 1102878165	smtjiuplvbya1@163.com
18	<b>Doremo Sexy Club Store</b> <b>Yiwu fishing fire Trade Co., LTD</b> Member ID: cn1520296810lldc Shop ID: 1101407384	yuhuomaoyi5@163.com
19	<b>EbadiahChoice Store and MalachiApparel Store</b> <b>Shenzhen Strauss Garment Co., Ltd</b> Member ID: cn1541372252jbuv Shop ID: 1101742232 Member ID: cn1535885235bvwi Shop ID: 1101564390	ebadiahchoice@163.com malachi20000603@aliyun.com
20	<b>EFG Clothes Store</b> <b>Guangzhou Lian Nashuo Trading Co., Ltd.</b> Member ID: cn1544918611evvr Shop ID: 1101924830	smtlnssmyxgs3@163.com



No.	Seller	Seller's Contact Information
21	<b>Enjoy Dream Store and FAIRY SEASON Official Store</b> <b>Shenzhen Haicheng Electronic Commerce Co., Ltd</b> Member ID: cn1064208199zwqae Shop ID: 1102133998 Member ID: cn1001997391zvuae Shop ID: 1102040457	Preoccupy@21cn.com DeepBlueSea@21cn.com
22	<b>facyny Store and MORCH Store</b> <b>Fuzhou Yichuang Times Network Technology Co., Ltd.</b> Member ID: cn1540500882kmyc Shop ID: 1101652264 Member ID: cn1063057757fqrae Shop ID: 1102062859	baodan8880618@163.com joom888666@163.com
23	<b>Fashion Sexy Girl Store</b> <b>Dongshan Shijun Electric Appliance Store, Maitreya City</b> Member ID: cn1533892129mqqq Shop ID: 1101540256	smy18810380811@163.com
24	<b>Felyn Boutique 2 Store and Felyn Boutique Store</b> <b>Shop5584234 Store</b> <b>Zhangzhou Longwen District Yino Trading Co., Ltd.</b> Member ID: cn1531556843bjxs Shop ID: 1101763766	yinuomaoyi2020@hotmail.com
26	<b>Hotsell Factory Store, HaiN 99 Store and Shop5115029 Store</b> <b>Dongguan Seabird Electronic Commerce Co., Ltd.</b> Member ID: cn1528816449omjr Shop ID: 1101343172 Member ID: cn1520928329apkj Shop ID: 1101262262	810515526@qq.com
27	<b>HWSTLE Store</b> <b>Quanzhou Lanxin Electronic Commerce Co., Ltd.</b> Member ID: cn1077075111rcfae Shop ID: 1103068335	lanxmy@163.com
29	<b>ICC Clothes Store</b> <b>Shenzhen Feijian Industrial Development Co., Ltd</b> Member ID: cn1535231137vkpo Shop ID: 1101615559	szfeijian1904@163.com
30	<b>Insvery Store</b> <b>Guangzhou Suxiao Network Technology Co., Ltd.</b> Member ID: cn1541602737mhqd Shop ID: 1101767016	suxiao7864@163.com
31	<b>Kliou Store Twenty-three (Shenzhen) Electronic Commerce Co., Ltd.</b> Member ID: cn1541886798tksl Shop ID: 1101773598	2251667102@qq.com
33	<b>LDLC Store and WELOVE GOOD Store</b> <b>Changsha Dianao Trading Co., Ltd.</b> Member ID: cn1069272665tplae Shop ID: 1102277721 Member ID: cn1069272653pvmae	smtdnsmyxgs2@163.com smtdnsmyxgs1@163.com

No.	Seller	Seller's Contact Information
	Shop ID: 1102279642	
35	<b>Lucy Garment Factory Store</b> <b>Shenzhen Tianyu Technology Co., Ltd.</b> Member ID: cn1541524184cslx Shop ID: 1101752524	smttyhkjyxgs1@163.com
36	<b>Matteobenni Store and MatteobenniFly Store</b> <b>Guangzhou Meiwa Electronic Commerce Co., Ltd.</b> Member ID: cn1516574079ipng Shop ID: 1101192231 Member ID: cn1520074147bqih Shop ID: 1101241995	smt99178@sina.com matteobenni888@sina.com
39	<b>Men and women clothes Store</b> <b>Shenzhen Shenmeida Clothing Co., Ltd.</b> Member ID: cn1539366224upkn Shop ID: 1101610359	smtshenmeida1@163.com
40	<b>Milo Girl Store Qianshan County Xiubei Electronic Commerce Co., Ltd.</b> Member ID: cn1521664151rdak Shop ID: 1101274283	fllovebei99@126.com
42	<b>Mo Rou Ni Store</b> <b>Jinjiang Lingyuan Ke Qingbiao Clothing Store</b> Member ID: cn1540824425oqol Shop ID: 1101710995	3321946889@qq.com
43	<b>MOOCLUND Store</b> <b>Changzhou Guomu Clothing Co., Ltd.</b> Member ID: cn1523766504lvrh Shop ID: 1101418771	1334569135@qq.com
44	<b>My friend ya Store</b> <b>Shenzhen Meihoujia Electronic Commerce Co., Ltd.</b> Member ID: cn1520251155eqah Shop ID: 1101248419	stijuys@sina.com
45	<b>Niwaaa StoreLuofei Rain Department Store, Nanhai District, Foshan City</b> Member ID: cn1542312995mnnda Shop ID: 1101794042	geojier14@163.com
46	<b>Nothing to Lose Dropshipping Store</b> <b>Shenzhen Hongba Yi Electronic Information Co., Ltd.</b> Member ID: cn1540636293tpxs Shop ID: 1101708263	smthbydzyxgs5@163.com
47	<b>RETURN SELF Store SHENZHEN YE TRADING TECHNOLOGY CO., LTD</b> Member ID: cn1539055143rfgn Shop ID: 1101608356	smtuyuyemaoyi5@163.com
49	<b>Safty Life Store Shenzhen Jihuahe Electronic Commerce Co., Ltd.</b> Member ID: cn1541319779nxzz	xiongda11122@163.com

No.	Seller	Seller's Contact Information
	Shop ID: 1101987071	
50	<b>Shop1100087213 Store</b> <b>Guangzhou Xiaojun Trading Co., Ltd</b> Member ID: cn1529022288xkaw Shop ID: 1101985003	x6iaojunmaoyi@outlook.com
51	<b>Shop1102858077 Store and Women Fashion Clothes</b> <b>Putian Jiequan Information Technology Co., Ltd.</b> Member ID: cn1075704106kigae Shop ID: 1102861017 Member ID: cn1075274470azdae Shop ID: 1102853933	kcuai6@163.com jiwoguai19640816@163.com
53	<b>Shop45692467 Store</b> <b>Guangzhou Jiansui Rui Trading Co., Ltd.</b> Member ID: cn1543890080nkby Shop ID: 1101940315	zijunstore1@163.com
54	<b>Shop911128014 Store</b> <b>SHENZHEN FU HENG ELECTRONICS CO., LTD</b> Member ID: cn1533859812fick Shop ID: 1101577502	qimengstore5@163.com
55	<b>Shop911750699 Store</b> <b>Shenzhen Mijia Technology Co., Ltd</b> Member ID: cn1541050838gcmo Shop ID: 1101693682	elijah2one@163.com
56	<b>Suancai Store</b> <b>Hefei Xiaohan Electronic Commerce Co., Ltd.</b> Member ID: cn1542242644cbpj Shop ID: 1101785790	lidandan_20202021@163.com
57	<b>Sweet Life Store</b> <b>Xiamen city fire gull Trading Co Ltd</b> Member ID: cn1072275936pdcae Shop ID: 1102546365	huangjg1994@163.com
58	<b>Tao Tao Yi Store</b> <b>Guangzhou Guigerian Trading Co., Ltd.</b> Member ID: cn1544902763emws Shop ID: 1101924815	smtgglsmxgs1@163.com
59	<b>Toplle Store</b> <b>Qianhao Electronic Commerce (Shenzhen) Co., Ltd.</b> Member ID: cn1543058094pfap Shop ID: 1101841879	1251243716@qq.com
61	<b>Unique Frost Store</b> <b>Guangzhou Feirui Fan Trading Co., Ltd.</b> Member ID: cn1544748101xacc Shop ID: 1101913315	smtfyfsmxgs5@163.com
62	<b>Variety girl-Store Guangzhou Darwin Cross-border E-Commerce Co., Ltd.</b> Member ID: cn1538918611lddm	s18810380811@163.com

No.	Seller	Seller's Contact Information
	Shop ID: 1101599870	
63	<b>Wenclothes Store</b> <b>Quanzhou Changge Trading Co., Ltd.</b> Member ID: cn1542486763fmmh Shop ID: 1101827052	y18650115940@163.com
65	<b>Xinceng Store</b> <b>Dongguan Kangya Electronic Technology Co., Ltd.</b> Member ID: cn1537258503skgg Shop ID: 1101564200	405121607@qq.com
66	<b>YangYang Baby Store</b> <b>Shenzhen Yiping Garment Co., Ltd</b> Member ID: cn1521331244rovx Shop ID: 1101322668	drakeyy@163.com
67	<b>YESSS Store</b> <b>Shenzhen Baoan District Guozhier Clothing Firm</b> Member ID: cn1538477194dhrr Shop ID: 1101599098	geojier2020@163.com
68	<b>Yezekiel2First Store</b> <b>Shenzhen Dianyu Garment Co., Ltd</b> Member ID: cn1070907803yykae Shop ID: 1102346242	yezekiel2first@163.com
70	<b>yizhanggui Store</b> <b>Shangrao Yufei Clothing Management Co., Ltd.</b> Member ID: cn1540495219ejeh Shop ID: 1101659656	fujjwei0818@sina.com
71	<b>YoulikeAll Store</b> <b>LIUZHOU MANAGER TRADING CO., LTD</b> Member ID: cn1533630128lxhv Shop ID: 1101510896	liumange665@163.com
75	<b>YY Beautiful Clothes Store</b> <b>Maitrya City Department Store Yesterday</b> Member ID: cn1544917454gnmg Shop ID: 1102773847	U18810380811@163.com
78	<b>ZZ-Clothing Store</b> Member ID: cn1542432070wlxk Shop ID: 1101794249	e18810380811@163.com
79	<b>7-A girl Store</b> Luohe 24 o'clock Electronic Commerce Co., Ltd Member ID: cn1521761482rhir Shop ID: 1101415574	970438769@qq.com
80	<b>A Lin Clothing Store A Lin Clothing Store in Zhongyuan District of Zhengzhou City</b> Member ID: cn1073280039jrwa Shop ID: 1102666101	alin519611@gmail.com
81	<b>A woman's Wardrobe Qianshan County Yiyang Electronic Commerce Co., Ltd.</b>	254383704@qq.com

No.	Seller	Seller's Contact Information
	Member ID: cn1077434989puuae Shop ID: 1103307249	
82	<b>AEY168 Store</b> <b>Yiwu Yan Can Trading Co., Ltd.</b> Member ID: cn1545324980hmln Shop ID: 1101940077	luoan1688@gmail.com
83	<b>Affya women Store</b> <b>Shanghai zucan tree Trading Co Ltd</b> Member ID: cn1532967531vtdz Shop ID: 1101403944	1542431466@qq.com
84	<b>Aicoinshan889 Store Shenzhen Xinhui Chengxin Information technology Co., Ltd.</b> Member ID: cn1521728826rhex Shop ID: 1101298752	aicoinshan@163.com
85	<b>angelafufu Store</b> <b>Shishi City Fumin Longhe Trading Co., Ltd.</b> Member ID: cn1513955527 Shop ID: 1101471076	cgf520lyl@163.com
87	<b>Baby AToys Store</b> <b>Wuhan Yuchengwei Electronic Commerce Co., Ltd.</b> Member ID: cn1539954907bcbp Shop ID: 1101953151	yuchwei06@163.com
88	<b>Beautiful day Dropshipping Store</b> <b>Shenzhen Kaifa Chang Export Trade Co., Ltd.</b> Member ID: cn1540803054ggkz Shop ID: 1101703425	smtkfckyxgs2@163.com
89	<b>Besley &amp; Halpert Store</b> <b>Shenzhen Linlang Jiapin Trading Co., Ltd.</b> Member ID: cn1523985140slhl Shop ID: 1101423754	smllmorrl05@163.com
90	<b>Black cat shop Store</b> <b>Shantou city success Logistics Co Ltd</b> Member ID: cn1060586096puuae Shop ID: 1102023052	909151124@qq.com
91	<b>Botvotee Chic Store</b> <b>Dongguan Humen Dahai Clothing Store</b> Member ID: cn1003173676dboae Shop ID: 1102033768	dahaiifushi06@163.com
92	<b>CharmingFashion Store</b> <b>Xiamen Ousikai ElectronicS Technology Co., Ltd.</b> Member ID: cn1531759050uyet Shop ID: 1101397501	xmosk122@163.com
93	<b>Cozok Girl Store</b> <b>Shenzhen China Hesheng Trading Co., Ltd.</b> Member ID: cn1074961474jkgae Shop ID: 1102724219	leofeng1112@163.com

No.	Seller	Seller's Contact Information
94	<b>Cynthia-Goddess Store</b> <b>Guangzhou Anresen Trading Co., Ltd.</b> Member ID: cn1547023898czil Shop ID: 1101951560	smtalssmyxgs3@163.com
95	<b>Dazzling Styles Store</b> <b>Shenzhen Sifan Electronics Co., Ltd.</b> Member ID: cn1520334167jorn Shop ID: 1101245280	ursulaai@sina.com
96	<b>Diousha Evening Dresses</b> <b>Suzhou Ziyu Butterfly Trading Co., Ltd.</b> Member ID: cn1001131184 Shop ID: 1100505994	875035922@qq.com
97	<b>dropclothes Store</b> <b>Shenzhen Gesheng Technology Co., Ltd</b> Member ID: cn1536277685uijq Shop ID: 1101555759	qq601838264@126.com
98	<b>Duzeala Store</b> <b>Suzhou Yixiu Trading Co., Ltd.</b> Member ID: cn1521700119ehbr Shop ID: 1101274820	dwy0210@163.com
99	<b>Elegant Evening Dress Store</b> <b>Hefei Baohe District Quasi Clothing Store</b> Member ID: cn1541031538qfrq Shop ID: 1101757499	tyh1556218638@163.com
100	<b>Evan Co. Ltd</b> <b>Shangrao Haobo Trading Co., Ltd.</b> Member ID: cn1511075620 Shop ID: 1100858376	xuzihao1019@163.com
101	<b>Fabulous Femme Store</b> <b>Hainan Linghe Trading Co Ltd</b> Member ID: cn1074816481xpoae Shop ID: 1102816281	lm18502010391@163.com
102	<b>Girl clothes factory shop Store and HE LIANG SHENG Clothing Store Store</b> Xiamen He Yun He Technology Co., Ltd. Member ID: cn1544965478shvx Shop ID: 1101910575	2671962050@qq.com
103	<b>Gugoods StoreSuzhou preferred good things fElectronic Commerce Co., Ltd.</b> Member ID: cn1524361155ubqm Shop ID: 1101793904	747139370@qq.com
104	<b>Halloween Factory Store</b> <b>Quanzhou Wanen Electronic Commerce Co., Ltd</b> Member ID: cn117597085 Shop ID: 1100828464	instyleswear@gmail.com
105	<b>HAO YUN Store</b> <b>Shangrao Qingzi Clothing Co., Ltd.</b> Member ID: cn1068747969jrtae	13353397079@189.cn

No.	Seller	Seller's Contact Information
	Shop ID: 1103104074	
106	<b>HGSH Women Garment Store Qingdao Hengguan Senhe Electronic Commerce Co., Ltd.</b> Member ID: cn1074002067vxhae Shop ID: 1102789494	192355680@qq.com
107	<b>Hi 8899 Store Store Dongshan Shijun Electric Appliance Store, Maitreya City</b> Member ID: cn1533834973dewq Shop ID: 1101875706	sxy18810380811@163.com
109	<b>HJ-Wedding Prom Dress Suzhou Heijiao Network Technology Co., Ltd.</b> Member ID: cn1073858433thqae Shop ID: 1102786081	heijiaokeji04@163.com
110	<b>Hopeshow Store Taijiang District Glory Real Estate Agency</b> Member ID: cn1531664180sdum Shop ID: 1101578170	tjqryfc225@163.com
111	<b>huangshi Store Nanyang Zhengtong Electronic Commerce Co., Ltd.</b> Member ID: cn1542441370pdod Shop ID: 1101867402	uder5333@21cn.com
112	<b>huashang Maxi Store Shenzhen beautiful clothing trade Co., LTD</b> Member ID: cn1520848917xcet Shop ID: 1101260685	3076686340@qq.com
113	<b>JinFashionClothesFactory Store Fuzhou Huijia Real Estate Agency Co., Ltd.</b> Member ID: cn1543414861ilen Shop ID: 1101856223	aiyoujin11@sina.com
114	<b>JISSAYES Store Shenzhen TianDebao Technology Co., Ltd.</b> Member ID: cn1078034135peeae Shop ID: 1103441040	3062969689@qq.com
115	<b>Kalenmos Dropshipping Store and Kalenmos World Apparel Store Yiwu Youyun Network Technology Co., Ltd.</b> Member ID: cn1533487559epge Shop ID: 1101494205 Member ID: cn1529195598hvba Shop ID: 1101355860	yywlnetwork3@163.com kalenmos@163.com
116	<b>Le Ning Shang Store Qianshan County Le Ning Shang Clothing Co., Ltd.</b> Member ID: cn1074337110pdiae Shop ID: 1102658390	1298241674@qq.com
117	<b>LULU Women Store Guangshui Kangli Trading Co., Ltd.</b>	bsrsmt002@163.com



No.	Seller	Seller's Contact Information
	Member ID: cn1541480313ycap Shop ID: 1101745803	
118	<b>Mifafa Store</b> <b>Wuhan Gull Wing Information Consulting Co., Ltd.</b> Member ID: cn1064979414rfiae Shop ID: 1102115793	minglangkeji82@163.com
119	<b>MM Stylish Clothes Store</b> <b>Yiwu ertong e-commerce firm</b> Member ID: cn1541447384mroe Shop ID: 1101748623	yimoast@163.com
120	<b>My Naughty Girl Store Ying Ying Department Store,</b> <b>Nanhai District, Foshan City</b> Member ID: cn1070497359sllae Shop ID: 1102127961	caiyingxin02@126.com
121	<b>New Experience Store</b> <b>Quanzhou Yingwei Network Technology Co., Ltd.</b> Member ID: cn1537639538uxsp Shop ID: 1101570904	yingweisumaitong4@163.com
122	<b>QXKJ-1 Store LEDP QX-CTO Whsel Store</b> <b>Wuxi Qingxin Technology Co., Ltd.</b> Member ID: cn1072680886kiyae Shop ID: 1102634347	472747871@qq.com
123	<b>RyansDress Store</b> <b>Guangzhou Nashuo Trading Co., Ltd.</b> Member ID: cn1544985506yhee Shop ID: 1101923522	smtlnssmyxgs6@163.com
124	<b>SASAMINI Store</b> <b>Guangzhou Weituo Electronic Commerce Co., Ltd</b> Member ID: cn1529294269kybh Shop ID: 1101365449	yuanlinstore5@sina.com
125	<b>Sexy Beauty Girl StoreShop1102983689 Store</b> <b>Guangzhou Jingyuan E-Commerce Co., Ltd</b> Member ID: cn1078345144bsuae Shop ID: 1102986671	aq19124355865@163.com
126	<b>SGCHUA Store</b> <b>Xingcheng Pengrong Garment Factory</b> Member ID: cn1529853468lzff Shop ID: 1101367470	sgchua2020@126.com
127	<b>Sheiny Store</b> <b>Shenzhen Xifan Ni Trading Co., Ltd.</b> Member ID: cn1072178760garae Shop ID: 1102551046	sheiny2022@163.com
128	<b>Shop1102089173 Store</b> <b>Guangzhou thick Electronic Technology Co., LTD</b> Member ID: cn1067376224rovae Shop ID: 1102086198	469193398@qq.com



No.	Seller	Seller's Contact Information
129	<b>Shop1102162304 Store</b> <b>Guangzhou barley International Trading Co Ltd</b> Member ID: cn1068698257okeae Shop ID: 1102152342	826082960@qq.com
130	<b>Shop1102699168 Store</b> <b>Shenzhen Gao Fei Feng Trading Co. Ltd.</b> Member ID: cn1074817648pwbae Shop ID: 1102697178	cici19982020@outlook.com
131	<b>Shop1102773971 Store</b> <b>Shanghai Chengshaner Electronic Commerce Co., Ltd.</b> Member ID: cn1073546286fyfae Shop ID: 1102776533	13456975838@163.com
132	<b>Shop1102788842 Store</b> <b>Zhenping Xunkang Trading Co., Ltd.</b> Member ID: cn1074026204oggae Shop ID: 1102788843	aaa376118@sina.com
134	<b>Shop1102989099 Store</b> <b>Zhongshan Chuangxi Electronic Technology Co., Ltd</b> Member ID: cn1076736367liwae Shop ID: 1102983381	zschuangxi03@163.com
135	<b>Shop1103150556 Store</b> <b>Shangrao Tianen Electronic Commerce Co., Ltd.</b> Member ID: cn1077576675jfrae Shop ID: 1103128968	lgl18479339088@qq.com
136	<b>Shop1103183130 Store</b> <b>Zhenping County Guolin Rain Trading Co. Ltd.</b> Member ID: cn1076715480zvvae Shop ID: 1103188117	zhaoyangli20141216@163.com
137	<b>Shop1103478006 Store</b> <b>Pucheng County Bian Yixing Department Store</b> Member ID: cn1078658023hfmae Shop ID: 1103478007	yhepyso865831@163.com
138	<b>Shop2925092 Store</b> <b>Shenzhen Vision Electronic Commerce Co., Ltd.</b> Member ID: cn1520092709jvat Shop ID: 1101248331	kreenda@sina.com
140	<b>Shop4999160 Store</b> <b>Shenzhen Hailihui Electronic Commerce Co., Ltd.</b> Member ID: cn1523914189mvlb Shop ID: 1101434700	hsjdisl@sina.com
141	<b>Shop5017195 Store</b> <b>Foshan Lapa Network Technology Co., Ltd.</b> Member ID: cn1528362530qzix Shop ID: 1101438922	pylmaternity19@163.com
142	<b>Shop5246274 Store</b> <b>Yiwu Shurui Electronic Commerce Co., Ltd.</b> Member ID: cn1529050738ppdl Shop ID: 1101352713	1981327530@qq.com

No.	Seller	Seller's Contact Information
143	<b>Shop5250273 Store and Urban dresses drop (shipping store)</b> <b>Shenzhen Qianhai Haiyi Industrial Co., Ltd.</b> Member ID: cn1529000253wemu Shop ID: 1101351394 Member ID: cn1529030135gqon Shop ID: 1101352726	smtqhhysy36@163.com smtqhhysy29@163.com
144	<b>Shop5870638 Store Qianshan County Ruoxi Clothing Management Co., Ltd.</b> Member ID: cn1533294840jrid Shop ID: 1101504515	srrxdzsw@163.com
145	<b>Shop911345044 Store</b> <b>Changsha Kaijia Jewelry Co., Ltd.</b> Member ID: cn1531572688ysgm Shop ID: 1101605326	lujiangh11@126.com
146	<b>Shop912143244 Store</b> <b>Guangzhou Duo Pin Clothing Co., Ltd.</b> Member ID: cn1542210814cdho Shop ID: 1101787189	shangkou2021@126.com
147	<b>Sishion Retro Store</b> <b>Yiwu Shixun Electronic Commerce Co., Ltd.</b> Member ID: cn1513373863 Shop ID: 1101063200	larryhuang518@outlook.com
148	<b>Stephanie-Sarah Store Qingdao Erxiu Mengchuang Electronic Commerce Co., Ltd.</b> Member ID: cn1077123263cgbac Shop ID: 1103081445	705297942@qq.com
149	<b>Super Sellers Sara</b> <b>Guangzhou Ciran Trading Co., Ltd.</b> Member ID: cn1511782987 Shop ID: 1100953805	alilss@126.com
150	<b>Tokimai Store</b> <b>Shenzhen Explorer Investment Development Co., Ltd.</b> Member ID: cn1538642440bmtz Shop ID: 1101591199	tk@fumalon.com
152	<b>Truyee Accessories Co Ltd Store and Tuyee Co Ltd Store</b> <b>Nanchang Xianting Shiqu Electronic Commerce Co., Ltd.</b> Member ID: cn1073953295ksuae Shop ID: 1102457212 Member ID: cn1073929078fdcae Shop ID: 1102459079	xianting1202@126.com xianting1101@126.com
153	<b>Vercareless Store</b> <b>Guangzhou Hongling Technology Co., Ltd</b> Member ID: cn1533668430ymzt Shop ID: 1101683266	xskjdh004@163.com
154	<b>Wildcoco Store</b> <b>Beijing Star Daren Technology zCo., Ltd</b> Member ID: cn1542522772afbb Shop ID: 1101820941	kinikiss2021720@163.com

No.	Seller	Seller's Contact Information
155	<b>Worldwide dropshipping factory store</b> <b>Shenzhen Samuel Trading Co., Ltd</b> Member ID: cn1541201413gjjx Shop ID: 1101692894	shenzhensamuer2@126.com
156	<b>WSFEC Fashion Store Jinjiang Dongshi Liu Shaofeng</b> <b>Clothing Business Department</b> Member ID: cn1072058024iovae Shop ID: 1102460251	ab23486262@163.com
157	<b>WXM Clothes Store</b> <b>Wuhan Yaxunchi Trading Co., Ltd.</b> Member ID: cn1074819091tgiae Shop ID: 1102942557	yaxunchi01@163.com
158	<b>XINDONGYI Store</b> <b>Shenzhen Dongxin Trading Co., Ltd</b> Member ID: cn1529118664exla Shop ID: 1101355580	xindongyi123@sina.com
159	<b>Y-GEOJIEER Store</b> <b>Foshan Nanhai District Yonoi Clothing Store</b> Member ID: cn1541320443jecu Shop ID: 1101718455	geojier11@163.com
160	<b>Yi Xian Baby Store</b> <b>Shenzhen Fengqi Trading Co., Ltd.</b> Member ID: cn1510144128 Shop ID: 1100737568	sbw1387@163.com
161	<b>youly Store</b> Member ID: cn1519979332bvvd Shop ID: 1101239923	654586047@qq.com
162	<b>Your Magical Wardrobe Store</b> Member ID: cn1524355517kwel Shop ID: 1101300716	bsmisy@163.com
163	<b>YUCHENGRUNDA Garment Store and YUCHRUDA</b> <b>Garment Store Store Qingdao Youcheng Runda Industry</b> <b>and Trade Co., Ltd.</b> Member ID: cn1058043757iirae Shop ID: 1102036298 Member ID: cn1058067275khzae Shop ID: 1101991348	2197149741@qq.com 2287711092@qq.com
164	<b>Zoctuo Official Store Shop5361030 Store</b> <b>Guangzhou Xinyi Bamboo Garment Co., Ltd.</b> Member ID: cn1529019613khau Shop ID: 1101355567	xyz18027451119@163.com
165	<b>ZYBELLE Store</b> <b>Shenzhen Ligan Port Ask Technology Co., Ltd.</b> Member ID: cn1541243673yjhi Shop ID: 1101708717	smtlqgwkyxgs5@163.com
166	<b>Zztrace 1009 Store</b> <b>Qionghai Zhusuo Trading Co., Ltd.</b> Member ID: cn1072011647ptdae	huangmijiao71@163.com

No.	Seller	Seller's Contact Information
	Shop ID: 1102455550	
167	<b>B-52Gluehwein Store</b> <b>Guangzhou feizhan dream Trading Co., LTD</b> Member ID: cn1546870751hhgi Shop ID: 1101954870	smtfzmsmyxgs6@163.com
168	<b>Dropshipping Shenzhen China Clothes Store</b> <b>Shenzhen Blue Valley Network Technology Co., Ltd.</b> Member ID: cn1542607270pkio Shop ID: 1101820629	smtlgdwlyxgs1@163.com
169	<b>Fashion Yuer Store</b> <b>Shangrao Longqiao Clothing Co., Ltd.</b> Member ID: cn1077841161szrae Shop ID: 1102907498	2621744547@qq.com
170	<b>FENGDAO Store</b> <b>Zhuzhou Elan Trading Co., Ltd.</b> Member ID: cn1528096749mmoi Shop ID: 1101436497	fengdaofa@outlook.com
171	<b>Invincible-Move forward -Never give up Store</b> <b>Shenzhen Pengpeng Square Technology Co., Ltd.</b> Member ID: cn1513837582 Shop ID: 1101098975	qiujiinhaiqjh214@163.com
172	<b>Naina Store</b> <b>Guangzhou Naina International Trade Co Ltd</b> Member ID: cn1542563430rrfz Shop ID: 1101808094	1971553914@qq.com
173	<b>NavOra Girl Store</b> <b>Shenzhen Qicheng Electronic Commerce Co., Ltd.</b> Member ID: cn1061160087okvae Shop ID: 1102023978	joyousehome01@126.com
174	<b>Plus Size Swimwear Store</b> <b>Guangzhou Huanshang Clothing Co., Ltd</b> Member ID: cn1001476267 Shop ID: 1102044468	429690045@qq.com
175	<b>POSH YLSHEN Official Store</b> <b>Shenzhen Yusheng Trading Co., Ltd.</b> Member ID: cn1528098384deoq Shop ID: 1101436860	e-sales-wendy@hotmail.com
176	<b>QNPQYX Official Store</b> <b>Nanchang Qingniao Electronic Commerce Co., Ltd.</b> Member ID: cn1528936101cbvo Shop ID: 1101447008	844334940@qq.com
177	<b>Secret Swimsuit Store</b> <b>Xuchang Lewo Trading Co., Ltd.</b> Member ID: cn1519532189yuzq Shop ID: 1101226930	xuchanglewo@sina.com

No.	Seller	Seller's Contact Information
178	<b>Shop1103432206 Store</b> <b>Fuzhou Yunying trading Co., Ltd.</b> Member ID: cn1080649065vriac Shop ID: 1103432207	daisy@mylacesfactory.com
179	<b>Shop5242088 Store</b> <b>Qintian Yiwu Sihai Electronic Commerce Co., Ltd.</b> Member ID: cn1527247982ntoa Shop ID: 1101348813	345awen5@sina.com
180	<b>SL-TX24 Store Jinshan Wensilong Garment Firm, Cangshan District, Fuzhou City</b> Member ID: cn1068864264loyae Shop ID: 1103331584	caiyulintx24@163.com
181	<b>They should belong to you Store</b> <b>Shenzhen Xingli Trading Co., Ltd</b> Member ID: cn1539591263imuy Shop ID: 1101618790	smtxslmyxgs5@163.com
182	<b>VAZN Official Store</b> Member ID: cn1528967888bymo Shop ID: 1101347530	fanximaoyi2027@hotmail.com
183	<b>VogueU Store</b> <b>Jianyang Mupiao Department Store</b> Member ID: cn1539771837bzaz Shop ID: 1101631360	qingte957@163.com
184	<b>Waterarea Store</b> <b>Xiamen Mingqi Electronic Commerce Co., Ltd.</b> Member ID: cn1529216861ysdp Shop ID: 1101355198	liucm0125@163.com
185	<b>Wildgeeker Store</b> <b>Xi'an Chaogou Information Technology Co., Ltd.</b> Member ID: cn1518048534upmh Shop ID: 1101204438	alibuy@thumbaby.com
186	<b>X Tao Store Store</b> <b>Qianshan County Le Ning Shang Clothing Co., Ltd.</b> Member ID: cn1077771220nzgae Shop ID: 1103316275	3665232783@qq.com
187	<b>XXOwen Li Store Shangrao Ouzi Thousand Clothing Management Co., Ltd.</b> Member ID: cn1541335980edus Shop ID: 1101709082	color8888@aliyun.com
188	<b>zhong qiu Store</b> <b>Shangrao Aifeng Clothing Co., Ltd.</b> Member ID: cn1542560224stzi Shop ID: 1101817512	15270383056@139.com

# Exhibit 1

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
1	<b>AiClothes Store</b> <b>Fuzhou Huijia Real Estate Agency Co., Ltd.</b> Member ID: cn1543412942ncdm	VA0002379907	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
2	<b>AILSIN Store and Shop910458077 Store</b> <b>Shenzhen Aoersheng Technology Co., Ltd</b> Member ID: cn1530005853nmvf	VA0002379907	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
3	<b>Aprmhisyl Girl Store and Aprmhisyl Official Store</b> <b>Hefei Yan Yao Trading ZCo., Ltd</b> Member ID: cn1520072688xpyc Member ID: cn1524128933deyb	VA0002379907	\$5,000.00 x2	<b>Total:</b> <b>\$30,000.00</b>
4	<b>ASHIOFU Official Store</b> <b>Chengdu wedding clothes guest Technology Co., LTD</b> Member ID: cn1529950953vgjk	VA0002379907	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
5	<b>AWM Store Shenzhen Haoyixin Technology Co., Ltd.</b> Member ID: cn1527900631imgx	VA0002379907	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
6	<b>Bessmini Apparel Store</b> <b>Guangzhou Dehengtong Electronic Commerce Co., Ltd.</b> Member ID: cn1538978251jzix	VA0002379907	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
10	<b>BX Groceries Store and July Loving Store and June Balala Store</b> <b>Shenzhen Qianhai Haiyi Industrial Co., Ltd.</b> Member ID: cn1529031398uuhz Member ID: cn1529013995yimh Member ID: cn1529030855bjqv	VA0002379907	\$5,000.00 x2	<b>Total:</b> <b>\$30,000.00</b>
11	<b>COIN 78 Store</b> <b>Qianshan County Changheng Electronic Commerce Co., Ltd.</b> Member ID: cn1077795006cczae	VA0002379907	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
13	<b>Day To Day shopping Shenzhen Arke Technology Co., Ltd.</b> Member ID: cn1513954205	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
14	<b>DilaFashion Store Shenzhen Yousheng Technology Co.</b> Member ID: cn1540504355iehc	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
15	<b>Doge Watches &amp; Clothes Store Shenzhen upper string Trading Co Ltd</b> Member ID: cn1513528805	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
16	<b>doitgood Store Shenzhen Liansheng Hong Trading Co., Ltd.</b> Member ID: cn1527411160fsac	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
17	<b>Dopamine clothing Store Changsha Ran Jiuju Trading Co., Ltd.</b> Member ID: cn1075680480mkoae	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
18	<b>Doremo Sexy Club Store Yiwu fishing fire Trade Co., LTD</b> Member ID: cn1520296810lldc	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
19	<b>EbadiahChoice Store and MalachiApparel Store Shenzhen Strauss Garment Co., Ltd</b> Member ID: cn1541372252jbuw Member ID: cn1535885235bvwi	VA0002379907	\$5,000.00 x2	<b>Total: \$30,000.00</b>
20	<b>EFG Clothes Store Guangzhou Lian Nashuo Trading Co., Ltd.</b> Member ID: cn1544918611evvr	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
21	<b>Enjoy Dream Store and FAIRY SEASON Official StoreShenzhen Haicheng Electronic Commerce Co., Ltd</b> Member ID: cn1064208199zwqae Member ID: cn1001997391zvuae	VA0002379907	\$5,000.00 x2	<b>Total: \$30,000.00</b>



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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
22	<b>facyuny Store and MORCH Store Fuzhou Yichuang Times Network Technology Co., Ltd.</b> Member ID: cn1540500882kmyc Member ID: cn1063057757fqrae	VA0002379907	\$5,000.00 x2	<b>Total: \$30,000.00</b>
23	<b>Fashion Sexy Girl Store Dongshan Shijun Electric Appliance Store, Maitreya City</b> Member ID: cn1533892129mqqq	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
24	<b>Felyn Boutique 2 Store and Felyn Boutique Store Shop5584234 Store Zhangzhou Longwen District Yino Trading Co., Ltd.</b> Member ID: cn1531556843bjxs	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
26	<b>Hotsell Factory Store, HaiN 99 Store and Shop5115029 Store Dongguan Seabird Electronic Commerce Co., Ltd.</b> Member ID: cn1528816449omjr Member ID: cn1520928329apkj	VA0002379907	\$5,000.00 x2	<b>Total: \$30,000.00</b>
27	<b>HWSTLE Store Quanzhou Lanxin Electronic Commerce Co., Ltd.</b> Member ID: cn1077075111rcfae	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
29	<b>ICC Clothes Store Shenzhen Feijan Industrial Development Co., Ltd</b> Member ID: cn1535231137vkpo	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
30	<b>Insvery Store Guangzhou Suxiao Network Technology Co., Ltd.</b> Member ID: cn1541602737mhqd	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>
31	<b>Kliou Store Twenty-three (Shenzhen) Electronic Commerce Co., Ltd.</b> Member ID: cn1541886798tksl	VA0002379907	\$5,000.00	<b>Total: \$15,000.00</b>

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
33	<b>LDLC Store and WELOVE GOOD Store Changsha Dianao Trading Co., Ltd.</b> Member ID: cn1069272665tplae Member ID: cn1069272653pvmae	VA0002379907	\$5,000.00 x2	Total: \$30,000.00
35	<b>Lucy Garment Factory Store Shenzhen Tianyu Technology Co., Ltd.</b> Member ID: cn1541524184cslx	VA0002379907	\$5,000.00	Total: \$15,000.00
36	<b>Matteobenni Store and MatteobenniFly Store Guangzhou Meiwa Electronic Commerce Co., Ltd.</b> Member ID: cn1516574079ipng Member ID: cn1520074147bqih	VA0002379907	\$5,000.00 x2	Total: \$30,000.00
39	<b>Men and women clothes Store Shenzhen Shenmeida Clothing Co., Ltd.</b> Member ID: cn1539366224upkn	VA0002379907	\$5,000.00	Total: \$15,000.00
40	<b>Milo Girl Store Qianshan County Xiubei Electronic Commerce Co., Ltd.</b> Member ID: cn1521664151rdak	VA0002379907	\$5,000.00	Total: \$15,000.00
42	<b>Mo Rou Ni Store Jinjiang Lingyuan Ke Qingbiao Clothing Store</b> Member ID: cn1540824425oqol	VA0002379907	\$5,000.00	Total: \$15,000.00
43	<b>MOOCLUND Store Changzhou Guomu Clothing Co., Ltd.</b> Member ID: cn1523766504lvrh	VA0002379907	\$5,000.00	Total: \$15,000.00
44	<b>My friend ya Store Shenzhen Meihoujia Electronic Commerce Co., Ltd.</b> Member ID: cn1520251155eqah	VA0002379907	\$5,000.00	Total: \$15,000.00
45	<b>Niwaana Store Luofei Rain Department Store, Nanhai District, Foshan City</b> Member ID: cn1542312995mnda	VA0002379907	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
46	<b>Nothing to Lose Dropshipping Store Shenzhen Hongba Yi Electronic Information Co., Ltd.</b> Member ID: cn1540636293tpxs	VA0002379907	\$5,000.00	Total: \$15,000.00
47	<b>RETURN SELF Store SHENZHEN YE TRADING TECHNOLOGY CO., LTD</b> Member ID: cn1539055143rfgn	VA0002379907	\$5,000.00	Total: \$15,000.00
49	<b>Safty Life Store Shenzhen Jihuahe Electronic Commerce Co., Ltd.</b> Member ID: cn1541319779nxzz	VA0002379907	\$5,000.00	Total: \$15,000.00
50	<b>Shop1100087213 Store Guangzhou Xiaojun Trading Co., Ltd</b> Member ID: cn1529022288xkaw	VA0002379907	\$5,000.00	Total: \$15,000.00
51	<b>Shop1102858077 Store and Women Fashion Clothes Putian Jiequan Information Technology Co., Ltd.</b> Member ID: cn1075704106kigae Member ID: cn1075274470azdae	VA0002379907	\$5,000.00 x2	Total: \$30,000.00
53	<b>Shop45692467 Store Guangzhou Jiansui Rui Trading Co., Ltd.</b> Member ID: cn1543890080nkby	VA0002379907	\$5,000.00	Total: \$15,000.00
54	<b>Shop911128014 Store SHENZHEN FU HENG ELECTRONICS CO., LTD</b> Member ID: cn1533859812fick	VA0002379907	\$5,000.00	Total: \$15,000.00
55	<b>Shop911750699 Store Shenzhen Mijia Technology Co., Ltd</b> Member ID: cn1541050838gcmo	VA0002379907	\$5,000.00	Total: \$15,000.00
56	<b>Suancai Store Hefei Xiaohan Electronic Commerce Co., Ltd.</b> Member ID: cn1542242644cbpj	VA0002379907	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
57	<b>Sweety Life Store Xiamen city fire gull Trading Co Ltd</b> Member ID: cn1072275936pdcae	VA0002379907	\$5,000.00	Total: \$15,000.00
58	<b>Tao Tao Yi Store Guangzhou Guigerian Trading Co., Ltd.</b> Member ID: cn1544902763emws	VA0002379907	\$5,000.00	Total: \$15,000.00
59	<b>Toplle Store Qianhao Electronic Commerce (Shenzhen) Co., Ltd.</b> Member ID: cn1543058094pfap	VA0002379907	\$5,000.00	Total: \$15,000.00
61	<b>Unique Frost Store Guangzhou Feirui Fan Trading Co., Ltd.</b> Member ID: cn1544748101xacc	VA0002379907	\$5,000.00	Total: \$15,000.00
62	<b>Variety girl-Store Guangzhou Darwin Cross-border E-Commerce Co., Ltd.</b> Member ID: cn1538918611lddm	VA0002379907	\$5,000.00	Total: \$15,000.00
63	<b>Wenclothes Store Quanzhou Changge Trading Co., Ltd.</b> Member ID: cn1542486763fmmh	VA0002379907	\$5,000.00	Total: \$15,000.00
65	<b>Xinceng Store Dongguan Kangya Electronic Technology Co., Ltd.</b> Member ID: cn1537258503skgg	VA0002379907	\$5,000.00	Total: \$15,000.00
66	<b>YangYang Baby Store Shenzhen Yiping Garment Co., Ltd</b> Member ID: cn1521331244rovx	VA0002379907	\$5,000.00	Total: \$15,000.00
67	<b>YESSS Store Shenzhen Baoan District Guozhier Clothing Firm</b> Member ID: cn1538477194dhrr	VA0002379907	\$5,000.00	Total: \$15,000.00
68	<b>Yezeziel2First Store Shenzhen Dianyu Garment Co., Ltd</b> Member ID: cn1070907803yykae	VA0002379907	\$5,000.00	Total: \$15,000.00
70	<b>yizhanggui Store Shangrao Yufei Clothing Management Co., Ltd.</b> Member ID: cn1540495219ejeh	VA0002379907	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
71	<b>YoulikeAll Store LIUZHOU MANAGER TRADING CO., LTD</b> Member ID: cn1533630128lxhv	VA0002379907	\$5,000.00	Total: \$15,000.00
75	<b>YY Beautiful Clothes Store Maitrya City Department Store Yesterday</b> Member ID: cn1544917454gnmg	VA0002379907	\$5,000.00	Total: \$15,000.00
78	<b>ZZ-Clothing Store</b> Member ID: cn1542432070wlxk	VA0002379907	\$5,000.00	Total: \$15,000.00
79	<b>7-A girl Store Luohe 24 o'clock Electronic Commerce Co., Ltd</b> Member ID: cn1521761482rhrr	VA0002379881	\$5,000.00	Total: \$15,000.00
80	<b>A Lin Clothing Store A Lin Clothing Store in Zhongyuan District of Zhengzhou City</b> Member ID: cn1073280039jrwae	VA0002379881	\$5,000.00	Total: \$15,000.00
81	<b>A woman's Wardrobe Qianshan County Yiyang Electronic Commerce Co., Ltd.</b> Member ID: cn1077434989puuae	VA0002379881	\$5,000.00	Total: \$15,000.00
82	<b>AEY168 Store Yiwu Yan Can Trading Co., Ltd.</b> Member ID: cn1545324980hmln	VA0002379881	\$5,000.00	Total: \$15,000.00
83	<b>Affya women Store Shanghai zucan tree Trading Co Ltd</b> Member ID: cn1532967531vtdz	VA0002379881	\$5,000.00	Total: \$15,000.00
84	<b>Aicoinshan889 Store Shenzhen Xinhui Chengxin Information technology Co., Ltd.</b> Member ID: cn1521728826rhex	VA0002379881	\$5,000.00	Total: \$15,000.00
85	<b>angelafufu Store Shishi City Fumin Longhe Trading Co., Ltd.</b> Member ID: cn1513955527	VA0002379881	\$5,000.00	Total: \$15,000.00
87	<b>Baby AToys Store Wuhan Yuchengwei Electronic Commerce Co., Ltd.</b> Member ID: cn1539954907bcbp	VA0002379881	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
88	<b>Beautiful day Dropshipping Store Shenzhen Kaifa Chang Export Trade Co., Ltd.</b> Member ID: cn1540803054ggkz	VA0002379881	\$5,000.00	Total: \$15,000.00
89	<b>Besley &amp; Halpert Store Shenzhen Linlang Jiapin Trading Co., Ltd.</b> Member ID: cn1523985140slhl	VA0002379881	\$5,000.00	Total: \$15,000.00
90	<b>Black cat shop Store Shantou city success Logistics Co Ltd</b> Member ID: cn1060586096puuae	VA0002379881	\$5,000.00	Total: \$15,000.00
91	<b>Botvotee Chic Store Dongguan Humen Dahai Clothing Store</b> Member ID: cn1003173676dboae	VA0002379881	\$5,000.00	Total: \$15,000.00
92	<b>CharmingFashion Store Xiamen Ousikai Electronics Technology Co., Ltd.</b> Member ID: cn1531759050uyet	VA0002379881	\$5,000.00	Total: \$15,000.00
93	<b>Cozok Girl Store Shenzhen China Hesheng Trading Co., Ltd.</b> Member ID: cn1074961474jkgae	VA0002379881	\$5,000.00	Total: \$15,000.00
94	<b>Cynthia-Goddess Store Guangzhou Anresen Trading Co., Ltd.</b> Member ID: cn1547023898czil	VA0002379881	\$5,000.00	Total: \$15,000.00
95	<b>Dazzling Styles Store Shenzhen Sifan Electronics Co., Ltd.</b> Member ID: cn1520334167jorn	VA0002379881	\$5,000.00	Total: \$15,000.00
96	<b>Diousha Evening Dresses Suzhou Ziyu Butterfly Trading Co., Ltd.</b> Member ID: cn1001131184	VA0002379881	\$5,000.00	Total: \$15,000.00
97	<b>dropclothes Store Shenzhen Gesheng Technology Co., Ltd</b> Member ID: cn1536277685uijq	VA0002379881	\$5,000.00	Total: \$15,000.00
98	<b>Duzeala Store Suzhou Yixiu Trading Co., Ltd.</b> Member ID: cn1521700119ehbr	VA0002379881	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
99	<b>Elegant Evening Dress Store</b> <b>Hefei Baohe District Quasi Clothing Store</b> Member ID: cn1541031538qfrq	VA0002379881	\$5,000.00	Total: \$15,000.00
100	<b>Evan Co. Ltd Shangrao Haobo Trading Co., Ltd.</b> Member ID: cn1511075620	VA0002379881	\$5,000.00	Total: \$15,000.00
101	<b>Fabulous Femme Store</b> <b>Hainan Linghe Trading Co Ltd</b> Member ID: cn1074816481xpoae	VA0002379881	\$5,000.00	Total: \$15,000.00
102	<b>Girl clothes factory shop Store and HE LIANG SHENG Clothing Store Store Xiamen He Yun He Technology Co., Ltd.</b> Member ID: cn1544965478shvx	VA0002379881	\$5,000.00	Total: \$15,000.00
103	<b>Gugoods Store Suzhou preferred good things fElectronic Commerce Co., Ltd.</b> Member ID: cn1524361155ubqm	VA0002379881	\$5,000.00	Total: \$15,000.00
104	<b>Halloween Factory Store Quanzhou Wanen Electronic Commerce Co., Ltd</b> Member ID: cn117597085	VA0002379881	\$5,000.00	Total: \$15,000.00
105	<b>HAO YUN Store Shangrao Qingzi Clothing Co., Ltd.</b> Member ID: cn1068747969jrtae	VA0002379881	\$5,000.00	Total: \$15,000.00
106	<b>HGSH Women Garment Store Qingdao Hengguan Senhe Electronic Commerce Co., Ltd.</b> Member ID: cn1074002067vxhae	VA0002379881	\$5,000.00	Total: \$15,000.00
107	<b>Hi 8899 Store Store Dongshan Shijun Electric Appliance Store, Maitreya City</b> Member ID: cn1533834973dewq	VA0002379881	\$5,000.00	Total: \$15,000.00
109	<b>HJ-Wedding Prom Dress Suzhou Heijiao Network Technology Co., Ltd.</b> Member ID: cn1073858433thqae	VA0002379881	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
110	<b>Hopeshow Store Taijiang District Glory Real Estate Agency</b> Member ID: cn1531664180sdum	VA0002379881	\$5,000.00	Total: \$15,000.00
111	<b>huangshi Store Nanyang Zhengtong Electronic Commerce Co., Ltd.</b> Member ID: cn1542441370pdod	VA0002379881	\$5,000.00	Total: \$15,000.00
112	<b>huashang Maxi Store Shenzhen beautiful clothing trade Co., LTD</b> Member ID: cn1520848917xcet	VA0002379881	\$5,000.00	Total: \$15,000.00
113	<b>JinFashionClothesFactory Store Fuzhou Huijia Real Estate Agency Co., Ltd.</b> Member ID: cn1543414861ilen	VA0002379881	\$5,000.00	Total: \$15,000.00
114	<b>JISSAYES Store Shenzhen TianDebao Technology Co., Ltd.</b> Member ID: cn1078034135peeae	VA0002379881	\$5,000.00	Total: \$15,000.00
115	<b>Kalenmos Dropshipping Store and Kalenmos World Apparel Store Yiwu Youyun Network Technology Co., Ltd.</b> Member ID: cn1533487559epge Member ID: cn1529195598hvba	VA0002379881	\$5,000.00	Total: \$15,000.00
116	<b>Le Ning Shang Store Qianshan County Le Ning Shang Clothing Co., Ltd.</b> Member ID: cn1074337110pdiae	VA0002379881	\$5,000.00	Total: \$15,000.00
117	<b>LULU Women Store Guangshui Kangli Trading Co., Ltd.</b> Member ID: cn1541480313ycap	VA0002379881	\$5,000.00	Total: \$15,000.00
118	<b>Mifafa Store Wuhan Gull Wing Information Consulting Co., Ltd.</b> Member ID: cn1064979414rfiae	VA0002379881	\$5,000.00	Total: \$15,000.00
119	<b>MM Stylish Clothes Store Yiwu ertong e-commerce firm</b> Member ID: cn1541447384mroe	VA0002379881	\$5,000.00	Total: \$15,000.00



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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
120	<b>My Naughty Girl Store Ying Ying Department Store, Nanhai District, Foshan City</b> Member ID: cn1070497359sllae	VA0002379881	\$5,000.00	Total: \$15,000.00
121	<b>New Experience Store Quanzhou Yingwei Network Technology Co., Ltd.</b> Member ID: cn1537639538uxsp	VA0002379881	\$5,000.00	Total: \$15,000.00
122	<b>QXKJ-1 Store LEDP QX-CTO Whsel Store Wuxi Qingxin Technology Co., Ltd.</b> Member ID: cn1072680886kiyae	VA0002379881	\$5,000.00	Total: \$15,000.00
123	<b>RyansDress Store Guangzhou Nashuo Trading Co., Ltd.</b> Member ID: cn1544985506yhee	VA0002379881	\$5,000.00	Total: \$15,000.00
124	<b>SASAMINI Store Guangzhou Weitu Electronic Commerce Co., Ltd</b> Member ID: cn1529294269kybh	VA0002379881	\$5,000.00	Total: \$15,000.00
125	<b>Sexy Beauty Girl StoreShop1102983689 Store Guangzhou Jingyuan E-Commerce Co., Ltd</b> Member ID: cn1078345144bsuae	VA0002379881	\$5,000.00	Total: \$15,000.00
126	<b>SGCHUA Store Xingcheng Pengrong Garment Factory</b> Member ID: cn1529853468lzff	VA0002379881	\$5,000.00	Total: \$15,000.00
127	<b>Sheiny Store Shenzhen Xifan Ni Trading Co., Ltd.</b> Member ID: cn1072178760garae	VA0002379881	\$5,000.00	Total: \$15,000.00
128	<b>Shop1102089173 Store Guangzhou thick Electronic Technology Co., LTD</b> Member ID: cn1067376224rovae	VA0002379881	\$5,000.00	Total: \$15,000.00
129	<b>Shop1102162304 Store Guangzhou barley International Trading Co Ltd</b> Member ID: cn1068698257okeae	VA0002379881	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
130	Shop1102699168 Store <b>Shenzhen Gao Fei Feng Trading Co. Ltd.</b> Member ID: cn1074817648pwbae	VA0002379881	\$5,000.00	Total: \$15,000.00
131	Shop1102773971 Store <b>Shanghai Chengshaner Electronic Commerce Co., Ltd.</b> Member ID: cn1073546286fyfae	VA0002379881	\$5,000.00	Total: \$15,000.00
132	Shop1102788842 Store <b>Zhenping Xunkang Trading Co., Ltd.</b> Member ID: cn1074026204oggae	VA0002379881	\$5,000.00	Total: \$15,000.00
134	Shop1102989099 Store <b>Zhongshan Chuangxi Electronic Technology Co., Ltd</b> Member ID: cn1076736367liwae	VA0002379881	\$5,000.00	Total: \$15,000.00
135	Shop1103150556 Store <b>Shangrao Tianen Electronic Commerce Co., Ltd.</b> Member ID: cn1077576675jfrae	VA0002379881	\$5,000.00	Total: \$15,000.00
136	Shop1103183130 Store <b>Zhenping County Guolin Rain Trading Co. Ltd.</b> Member ID: cn1076715480zvvaе	VA0002379881	\$5,000.00	Total: \$15,000.00
137	Shop1103478006 Store <b>Pucheng County Bian Yixing Department Store</b> Member ID: cn1078658023hfmae	VA0002379881	\$5,000.00	Total: \$15,000.00
138	Shop2925092 Store <b>Shenzhen Vision Electronic Commerce Co., Ltd.</b> Member ID: cn1520092709jvat	VA0002379881	\$5,000.00	Total: \$15,000.00
140	Shop4999160 Store <b>Shenzhen Hailihui Electronic Commerce Co., Ltd.</b> Member ID: cn1523914189mvlb	VA0002379881	\$5,000.00	Total: \$15,000.00
141	Shop5017195 Store <b>Foshan Lapa Network Technology Co., Ltd.</b> Member ID: cn1528362530qzix	VA0002379881	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
142	<b>Shop5246274 Store Yiwu Shurui Electronic Commerce Co., Ltd.</b> Member ID: cn1529050738ppdl	VA0002379881	\$5,000.00	Total: \$15,000.00
143	<b>Shop5250273 Store and Urban dresses drop (shipping store) Shenzhen Qianhai Haiyi Industrial Co., Ltd.</b> Member ID: cn1529000253wemu Member ID: cn1529030135gqon	VA0002379881	\$5,000.00	Total: \$15,000.00
144	<b>Shop5870638 Store Qianshan County Ruoxi Clothing Management Co., Ltd.</b> Member ID: cn1533294840jrid	VA0002379881	\$5,000.00	Total: \$15,000.00
145	<b>Shop911345044 Store Changsha Kaijia Jewelry Co., Ltd.</b> Member ID: cn1531572688ysgm	VA0002379881	\$5,000.00	Total: \$15,000.00
146	<b>Shop912143244 Store Guangzhou Duo Pin Clothing Co., Ltd.</b> Member ID: cn1542210814cdho	VA0002379881	\$5,000.00	Total: \$15,000.00
147	<b>Sishion Retro Store Yiwu Shixun Electronic Commerce Co., Ltd.</b> Member ID: cn1513373863	VA0002379881	\$5,000.00	Total: \$15,000.00
148	<b>Stephanie-Sarah Store Qingdao Erxiu Mengchuang Electronic Commerce Co., Ltd.</b> Member ID: cn1077123263cgbae	VA0002379881	\$5,000.00	Total: \$15,000.00
149	<b>Super Sellers Sara Guangzhou Ciran Trading Co., Ltd.</b> Member ID: cn1511782987	VA0002379881	\$5,000.00	Total: \$15,000.00
150	<b>Tokimai Store Shenzhen Explorer Investment Development Co., Ltd.</b> Member ID: cn1538642440bmtty	VA0002379881	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
152	<b>Truyee Accessories Co Ltd Store and Truyee Co Ltd Store Nanchang Xianting Shiqu Electronic Commerce Co., Ltd.</b> Member ID: cn1073953295ksuae Member ID: cn1073929078fdcae	VA0002379881	\$5,000.00 x2	Total: \$30,000.00
153	<b>Vercareless Store Guangzhou Hongling Technology Co., Ltd</b> Member ID: cn1533668430ymzt	VA0002379881	\$5,000.00	Total: \$15,000.00
154	<b>Wildcoco Store Beijing Star Daren Technology Co., Ltd</b> Member ID: cn1542522772afbb	VA0002379881	\$5,000.00	Total: \$15,000.00
155	<b>Worldwide dropshipping factory store Shenzhen Samuel Trading Co., Ltd</b> Member ID: cn1541201413gjix	VA0002379881	\$5,000.00	Total: \$15,000.00
156	<b>WSFEC Fashion Store Jinjiang Dongshi Liu Shaofeng Clothing Business Department</b> Member ID: cn1072058024iovae	VA0002379881	\$5,000.00	Total: \$15,000.00
157	<b>WXM Clothes Store Wuhan Yaxunchi Trading Co., Ltd.</b> Member ID: cn1074819091tgiae	VA0002379881	\$5,000.00	Total: \$15,000.00
158	<b>XINDONGYI Store Shenzhen Dongxin Trading Co., Ltd</b> Member ID: cn1529118664exla	VA0002379881	\$5,000.00	Total: \$15,000.00
159	<b>Y-GEOJIEER Store Foshan Nanhai District Yonoi Clothing Store</b> Member ID: cn1541320443jecu	VA0002379881	\$5,000.00	Total: \$15,000.00
160	<b>Yi Xian Baby Store Shenzhen Fengqi Trading Co., Ltd.</b> Member ID: cn1510144128	VA0002379881	\$5,000.00	Total: \$15,000.00
161	<b>youly Store</b> Member ID: cn1519979332bvvd	VA0002379881	\$5,000.00	Total: \$15,000.00
162	<b>Your Magical Wardrobe Store</b> Member ID: cn1524355517kwel	VA0002379881	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
163	<b>YUCHENGRUNDA Garment Store and YUHRUDA Garment Store Store Qingdao Youcheng Runda Industry and Trade Co., Ltd.</b> Member ID: cn1058043757iirae Member ID: cn1058067275khzae	VA0002379881	\$5,000.00 x2	Total: \$30,000.00
164	<b>Zoctuo Official Store Shop5361030 Store Guangzhou Xinyi Bamboo Garment Co., Ltd.</b> Member ID: cn1529019613khau	VA0002379881	\$5,000.00	Total: \$15,000.00
165	<b>ZYBELLE Store Shenzhen Ligan Port Ask Technology Co., Ltd.</b> Member ID: cn1541243673yjhi	VA0002379881	\$5,000.00	Total: \$15,000.00
166	<b>Zztrace 1009 Store Qionghai Zhusuo Trading Co., Ltd.</b> Member ID: cn1072011647ptdae	VA0002379881	\$5,000.00	Total: \$15,000.00
167	<b>B-52Gluehwein Store Guangzhou feizhan dream Trading Co., LTD</b> Member ID: cn1546870751hhgi	VA0002379893	\$5,000.00	Total: \$15,000.00
168	<b>Dropshipping Shenzhen China Clothes Store Shenzhen Blue Valley Network Technology Co., Ltd.</b> Member ID: cn1542607270pkio	VA0002379893	\$5,000.00	Total: \$15,000.00
169	<b>Fashion Yuer Store Shangrao Longqiao Clothing Co., Ltd.</b> Member ID: cn1077841161szrae	VA0002379893	\$5,000.00	Total: \$15,000.00
170	<b>FENGDAO Store Zhuzhou Elan Trading Co., Ltd.</b> Member ID: cn1528096749mmoi	VA0002379893	\$5,000.00	Total: \$15,000.00
171	<b>Invincible-Move forward - Never give up Store Shenzhen Pengpeng Square Technology Co., Ltd.</b> Member ID: cn1513837582	VA0002379893	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
172	<b>Naina Store Guangzhou Naina International Trade Co Ltd</b> Member ID: cn1542563430rrfz	VA0002379893	\$5,000.00	Total: \$15,000.00
173	<b>NavOra Girl Store Shenzhen Qicheng Electronic Commerce Co., Ltd.</b> Member ID: cn1061160087okvae	VA0002379893	\$5,000.00	Total: \$15,000.00
174	<b>Plus Size Swimwear Store Guangzhou Huanshang Clothing Co., Ltd</b> Member ID: cn1001476267	VA0002379893	\$5,000.00	Total: \$15,000.00
175	<b>POSH YLSHEN Official Store Shenzhen Yusheng Trading Co., Ltd.</b> Member ID: cn1528098384deoq	VA0002379893	\$5,000.00	Total: \$15,000.00
176	<b>QNPQYX Official Store Nanchang Qingniao Electronic Commerce Co., Ltd.</b> Member ID: cn1528936101cbvo	VA0002379893	\$5,000.00	Total: \$15,000.00
177	<b>Secret Swimsuit Store Xuchang Lewo Trading Co., Ltd.</b> Member ID: cn1519532189yuzq	VA0002379893	\$5,000.00	Total: \$15,000.00
178	<b>Shop1103432206 Store Fuzhou Yunying trading Co., Ltd.</b> Member ID: cn1080649065vriac	VA0002379893	\$5,000.00	Total: \$15,000.00
179	<b>Shop5242088 Store Qintian Yiwu Sihai Electronic Commerce Co., Ltd.</b> Member ID: cn1527247982ntoa	VA0002379893	\$5,000.00	Total: \$15,000.00
180	<b>SL-TX24 Store Jinshan Wensilong Garment Firm, Cangshan District, Fuzhou City</b> Member ID: cn1068864264loyae	VA0002379893	\$5,000.00	Total: \$15,000.00
181	<b>They should belong to you Store Shenzhen Xingli Trading Co., Ltd</b> Member ID: cn1539591263imuy	VA0002379893	\$5,000.00	Total: \$15,000.00
182	<b>VAZN Official Store</b> Member ID: cn1528967888bymoy	VA0002379893	\$5,000.00	Total: \$15,000.00

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No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
183	<b>VogueU Store Jianyang Mupiao Department Store</b> Member ID: cn1539771837bzaz	VA0002379893	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
184	<b>Waterarea Store Xiamen Mingqi Electronic Commerce Co., Ltd.</b> Member ID: cn1529216861ysdp	VA0002379893	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
185	<b>Wildgeeker Store Xi'an Chaogou Information Technology Co., Ltd.</b> Member ID: cn1518048534upmh	VA0002379893	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
186	<b>X Tao Store Store Qianshan County Le Ning Shang Clothing Co., Ltd.</b> Member ID: cn1077771220nzgae	VA0002379893	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
187	<b>XXOwen Li Store Shangrao Ouzi Thousand Clothing Management Co., Ltd.</b> Member ID: cn1541335980edus	VA0002379893	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
188	<b>zhong qiu Store Shangrao Aifeng Clothing Co., Ltd.</b> Member ID: cn1542560224stzi	VA0002379893	\$5,000.00	<b>Total:</b> <b>\$15,000.00</b>
<b>Total:</b>				<b>\$2,595,000.00</b>



**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-03191-VMK-GAF

Honorable Virginia M. Kendall

Magistrate Gabriel A. Fuentes

**DECLARATION OF LIANGJIE LI**  
**IN SUPPORT OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

I, Liangjie Li, of Hong Kong, a special administrative region of the People's Republic of China, 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 Default Judgment (the "Motion").

3. I am the Chief Operations Officer for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff markets and sells women's clothing and related items under the "Rotita" brand name ("Rotita").



5. Rotita is an extremely well-known source of women's clothing in the United States and has been the subject of rampant counterfeit sales through online platforms such as Amazon, Walmart, Alibaba, eBay, Aliexpress, and Temu (the "Platform"), which is the online sales platform at issue in this action. These are the six largest online retailers in the World – and Plaintiff does not sell its products through any one of them. Rather, Plaintiff only sells its genuine Rotita brand products through its website rotita.com.

Plaintiff seeks an award of statutory damages against all defaulted Schedule "A" Defendants (the "Defaulted Defendants") in this action. The Defaulted Defendants are accused of intentionally and willfully infringing Plaintiff's following three (3) federally registered copyrights asserted in this action: (1) VA0002379907; (2) VA0002379881; and (3) VA0002379893 (the "Copyright Protected Images").

6. It is without question that the Defaulted Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. In this regard, Plaintiff's Copyright Protected Images, often representing recent product releases, have almost instantaneously appeared on the Defaulted Defendants' online stores maintained with the Platform (the "Online Stores"). Moreover, the Defaulted Defendants have unquestionably been operating their Online Stores using the misappropriated Copyright Protected Images through a sophisticated counterfeit network utilizing a highly developed supply chain capable of supplying thousands of knockoff products featuring an array of Plaintiff's textile patterns and designs that could not otherwise be accomplished on an individual basis.

7. The basic nature of the copyright infringement scheme employed demonstrates that the Defaulted Defendants not only knew of the impropriety of their conduct but had to implement their counterfeit scheme through sophisticated sources and established supply chains. This is the

only possible scenario under which the Defaulted Defendants could immediately procure, without authorization, Plaintiff's new copyright protected product images and offer them for sale through their Online Stores. In addition, the Defaulted Defendants have intentionally used the Copyright Protected Images for soliciting counterfeit, knockoff Rotita product sales on a Platform that Plaintiff does not, and has not, utilized to sell its authentic products. Simply put, these facts not only establish the Defaulted Defendants' knowledge and intentional infringement of Plaintiff's Copyright Protected Images.

8. Plaintiff has paid the rate of \$500 per hour for Shawn A. Mangano, Esq.'s legal services in this action and in other pending actions. Plaintiff has also paid the rates of \$400 per hour for Joseph W. Droter, Esq.'s legal services in this action and in other pending actions. Plaintiff has also paid the rate of \$275 per hour for paralegal services provided by Heather Ikerd and Elizabeth Cummings in this action and in other pending actions.

9. Plaintiff's rough estimated gross revenue from United States sales likely exceeds \$20,000,000 USD per year. Of this amount, Plaintiff roughly estimates that over \$1,000,000 is derived from sales in the State of Illinois. Moreover, Plaintiff spends roughly anywhere from \$8,000,000 to \$12,000,000 USD each year to specifically advertise its Rotita brand in the United States through such online advertising sources as Google Ads, Facebook, and Bing. Furthermore, the company has spent more than \$80,000 in filing fees paid to the United States Copyright Office just to secure registration of copyright protected works being asserted in, currently, over fourteen (14) enforcement actions initiated in this judicial district. Simply put, Plaintiff is an extremely successful company that earns millions of dollars from product sales in the United States – including within the State of Illinois. To do so, Plaintiff annually spends tens of millions of dollars advertising in the United States to promote the sale of its brand.



10. Plaintiff expects to earn a net profit of approximately 30% on the sale of its Rotita brand products. This figure, however, includes substantial advertising expenses that the Defaulted Defendants would not have to pay since they are largely capitalizing on Plaintiff's advertising efforts by misappropriating its copyright protected images and imbedding the term "Rotita" in their Temu.com search engine optimization. Doing so causes their online stores to be displayed whenever someone searches for "Rotita" on Temu.com despite Plaintiff not selling authentic "Rotita" brand products on the platform. Based on the foregoing, I would estimate that the Defaulted Defendants' Online Stores operate at a net profit of between 40% to 50%. I believe that a disgorgement of the Defaulted Defendants' profits would fall within the net profit range. However, it is impossible to definitively calculate the Defaulted Defendants' total sales on the Platform through their Online Stores or to ascertain their expenses related to their infringing sales because they have failed to appear, defend, or otherwise participate in this action.

11. The Defaulted Defendants named in the company's copyright infringement enforcement actions are engaged in the practice of copying Plaintiff's copyright protected product images almost instantaneously after they are first displayed on the company's website and then associating these images with sale and promotion of unauthorized, counterfeit products of substandard quality, thereby deceiving consumers – including the citizens of the State of Illinois. Moreover, given the nature of Plaintiff's goods, such large-scale sales operations over multiple online retail platforms require considerable supply chain coordination that could not reasonably be accomplished independently by any of the named Defaulted Defendants. Simply put, Plaintiff maintains that the Defaulted Defendants are acting in concert, pursuant to a common scheme, whereby they independently copy the company's copyright protected images, without authorization, from its website or such unauthorized images are being provided by the same

common source associated with manufacturing the counterfeit products being sold on the Defaulted Defendants' Platform storefronts.

12. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulted Defendants' unauthorized use of its federally registered copyright protected images asserted in this action. This results in the direct harm to Plaintiff's brand reputation and loss of consumer goodwill, both of which are harms that are virtually impossible to ascertain the resulting economic loss.

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

Executed on January 7, 2025, in Hong Kong.

By: Liangjie Li  
LIANGJIE LI

CERTIFICATE OF SERVICE

I hereby certify that on the 6th 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 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, temu.

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