

**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-01689-ARW-JC

Honorable Judge Andrea R. Wood

Magistrate Jeffrey Cole

**MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST THE IDENTIFIED DEFAULTED SCHEDULE "A" DEFENDANTS**

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 eighty-four (84) Schedule "A" Defendants (the "Defaulted Defendants"), which have been separately listed in Exhibit "1" with their respective limited sales data to the accompanying Declaration of Joseph W. Droter, Esq. (the "Droter Decl."). Plaintiff's Motion is made and based upon the supporting Memorandum of Law, the Droter 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. If granted, Plaintiff's Motion for Default Judgment disposes of all remaining defendants.

DATED: June 12, 2025

Respectfully submitted,

By: */s/ Joseph W Droter*

Joseph W. Droter (Bar No. 6329630)

Katherine M. Kuhn (Bar No. 6331405)

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of June 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, temu.

By: /s/ Joseph W. Droter
Joseph W. Droter (IL Bar No. 6329630)

No.	Seller	Seller's Contact Information
2	Aboutwomensclothing Mall ID 117493024949	841014546@qq.com
4	AILISA Mall ID 634418212390180	335838967@qq.com
10	An inch of light Mall ID 5244636459785	326046695@qq.com
11	Aoyuo Mall ID 634418211782315	957285357@qq.com
13	Attachedto Mall ID 634418211614001	2579717204@qq.com
18	Bestie Curvy Mall ID 634418211793903	656088392@qq.com
19	Birdfashionclothing Mall ID 1720489990037	17307288006@163.com
20	BM Fashion Mall ID 634418209993113	171093529@qq.com
22	Charm Clothes dress Mall ID 5686361796687	15271169658@163.com
23	Chen xun fu shi Mall ID 634418211514952	314238500@qq.com
25	Clothessssssss Mall ID 634418210983129	820205265@QQ.COM

No.	Seller	Seller's Contact Information
26	Clothing Beauty Mall ID 244435390978	501747917@qq.com
28	Curvy Mall ID 146281689671	1964586221@qq.com
30	CYFashion Mall ID 70501117270	415441686@qq.com
38	EVFVB Mall ID 6208020471618	1595497569@qq.com
39	EXTRA Mall ID 51475333049	946028144@qq.com
40	FAIRYFAIR Mall ID 634418211321243	15821695135@163.com
41	FaNaLa Mall ID 4369635687830	assistanthmr@outlook.com
42	Fashion trend womens clothing Mall ID 634418212064133	750304476@qq.com
44	FridayGirl Mall ID 5745453647444	664816500@qq.com
45	Fu Yue studio Mall ID 5702086479922	250934861@qq.com
50	HX Ladies Fashion Mall ID 634418211073557	81330691@qq.com
53	JINGAOCHI GARMENT Mall ID 4920528197538	jinchil@jingaochi.com
55	Kaqiwa Mall ID 634418211452054	875701065@qq.com
58	LIUMM Mall ID 5602586604059	2671054193@qq.com
59	LUCKLILY Mall ID 5419829820946	lilyth_lala@163.com
60	MidandOldLife Mall ID 4933334847472	1964586221@qq.com
62	MNSPLusSize Mall ID 221222694131	520008441@qq.com
64	MUSHANGNI Mall ID 657564779675	13060849687@163.com
66	Nimanya Mall ID 38015328411	195365538@qq.com
68	OUZINUO Mall ID 634418212249416	1039730175@qq.com
69	PENGWANG Mall ID 634418211898161	16620897212@163.com

No.	Seller	Seller's Contact Information
72	SallyShaman Mall ID 66907202117	2973369404@QQ.COM
74	ShiJu Mall ID 634418210696248	332338406@qq.com
77	Taipingyang clothing trade Mall ID 5517776517295	2676023118@qq.com
78	Tomlover Mall ID 634418211532767	371215314@qq.com
80	Weeksix Mall ID 634418211982972	874826622@qq.com
82	Weinimeigongsi Mall ID 634418210064916	361859782@qq.com
86	XinMingyuan Mall ID 4605176695000	296719588@qq.com
87	XINGMUZHI Mall ID 280996421172	382894048@QQ.COM
88	Yihuimei Mall ID 5515939082246	441083093@qq.com
91	Yimi Le Clothing Mall ID 4837796854682	aa309684743@126.com
95	YQJ Mall ID 634418210495596	835321900@qq.com
96	YU closet Mall ID 634418211883875	3026179982@qq.com
100	Aixia Mall ID 634418211222545	2672094305@qq.com
102	Beimifushi Mall ID 4868068335702	823413988@qq.com
104	CoCo Modern Mall ID 234178238926	1053741336@qq.com
105	Coral clothing Mall ID 4945753884123	1129692531@qq.com
106	DEFZEAL Mall ID 233965839613	1940890460@qq.com
108	DNEATERSWIMSUIT Mall ID 6216470821533	1216269992@qq.com
111	HAIMENGFUSHI Mall ID 5113012791727	751506823@qq.com
112	Haiyan clothing Mall ID 5310021745100	371239857@qq.com
113	HaoboFS Mall ID 634418211295908	415289553@qq.com

No.	Seller	Seller's Contact Information
118	LINGDALIN Mall ID 634418211502374	781244771@qq.com
121	Mimotora Mall ID 6083030765636	271990700@qq.com
123	Necoo Mall ID 4915303824340	71344903@qq.com
125	Ngan Mall ID 6159760585886	213898938@qq.com
130	Sarahgirl Mall ID 634418211127885	70212550@qq.com
132	Swimoutlet Mall ID 4693600824584	464665936@qq.com
133	WesternMermaid Mall ID 634418212085208	baovivien@hotmail.com
137	YYSY Mall ID 4932898449539	939735728@qq.com
140	Beautymark Mall ID 6188818069552	497553619@qq.com
141	Cansheng Mall ID 3598609741036	a151797619881@163.com
142	Ceten Mall ID 634418211999891	dukes.cool@163.com
143	Coocona fashion Mall ID 5029364425608	taoxiaoxu2011@foxmail.com
147	DONGFANGSTYLE Mall ID 4944017706136	272889309@qq.com
148	DYstyle Mall ID 4546958804264	597235073@qq.com
153	Huishangying clothing Mall ID 4362225145628	506424237@qq.com
154	Imango Fashion Mall ID 179311289499	15634095518@163.com
157	JIAWEIYAFUZHUANGYOUXIANGONGSI Mall ID 126150994444	306561014@qq.com
159	Lianshangying Mall ID 634418211878993	506424237@qq.com
165	Moving light fashion Mall ID 2397223686179	675040879@qq.com
166	Muthenswimsuit Mall ID 116006867106	6456286@qq.com
168	Omani fashion clothing Mall ID 6151345544238	506182304@qq.com

No.	Seller	Seller's Contact Information
170	PrettyMoon Mall ID 147154680814	2643208471@qq.com
171	REAYOYO Mall ID 634418211078523	842052682@qq.com
173	Shley Mall ID 4687144028072	529261594@qq.com
175	Super fashions Mall ID 6207609503045	a18720690965@163.com
177	two red Mall ID 5103912475480	qianxi15814894088@163.com
180	WFUW Mall ID 634418210689975	3133503331@qq.com
181	VISHIE Mall ID 4829784114295	466350025@qq.com
182	Yasixuan Mall ID 4815406913658	64633678@qq.com
183	YEB Mall ID 5715568560666	469625137@qq.com
185	YOYOLIU Mall ID 5897658181900	825050748@qq.com

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HONG KONG LEYUZHEN TECHNOLOGY
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THE INDIVIDUALS, CORPORATIONS,
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Defendants.

Case No. 1:24-cv-01689-ARW-JC

Honorable Judge Andrea R. Wood

Magistrate Jeffrey Cole

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST THE IDENTIFIED
DEFAULTED SCHEDULE "A" DEFENDANTS**

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 eighty-four (84) Schedule "A" Defendants (the "Defaulted Defendants"), which have been separately listed in Exhibit "1" to the accompanying Declaration of Joseph W. Droter, Esq. (the "Droter Decl."). Plaintiff's Motion is made and based upon this Memorandum of Law, the Droter 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 May 27, 2025, the Court granted Plaintiff's Motion for Entry of Clerk's Default against the Defaulted Defendants. [Dkt. No. 106.] Pursuant to Rule 55(b)(2), Plaintiff now respectfully

moves this Court for an entry of a default judgment finding the Defaulted Defendants liable on all counts asserted in Plaintiff's First Amended Complaint. [Dkt. No. 24.] These asserted counts include claims for Copyright Infringement (Count I), False Designation of Origin (Count II), and violation of the Illinois Uniform Deceptive Trade Practices Act (the "Uniform Deceptive Trade Practices Act") (Count III). [Dkt. No. 24]

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: VA0002379907, VA0002379894, and VA0002379930 (the "Copyright Protected Images"). (Droter Decl. ¶ 5.) Plaintiff additionally requests the Court issue a permanent injunction against the Defaulted Defendants. *See* 17 U.S.C. § 502(a). Alternatively, Plaintiff requests issuance of a permanent injunction 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 Temu.com online sales platform (the "Platform") to market and sell competing, knockoff, counterfeit products resembling Plaintiff's authentic Rotita products, thereby deceiving public consumers as to the quality, nature, and source of goods being purchased. (Droter 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 products by displaying, without authorization, Plaintiff's Copyright Protected Images on their online storefronts. (Droter 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 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 May 27, 2025, the Court granted Plaintiff's Motion for Entry of Clerk's Default. [Dkt. No. 106.] 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) and violation of the Uniform Deceptive Trade Practices Act (Count III) as asserted in the First Amended Complaint. [Dkt. No. 24] 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.

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 May 27, 2025, the Court granted Plaintiff's Motion for Entry of Clerk's Default against the Defaulted Defendants. [Dkt. No. 106.] 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, and violation of the Uniform Deceptive Trade Practice Act as asserted in the First Amended Complaint. [Dkt. No. 24]

As argued below, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the eighty-four (84) 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; 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. 106], 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. 24] 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. 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. (Droter 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. 24 at 9] and has supplied the Court with a summary of all registrations issued by the United States Copyright Office [Dkt. No. 24, Ex. 1]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulted Defendants have infringed the company’s Copyright Protected Images. [Dkt. Nos. 24 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. 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. Plaintiff's only available evidence of infringing sales or costs are provided in Exhibit 1 to the Declaration of Joseph W. Droter, created by the third-party platform temu based on their sales records. (*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 competing, 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. (Droter 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 is 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 enhanced statutory damages per Defaulted Defendant for willful infringement per infringed Copyright Protected Image in this action. (Droter

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. 106.] 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. (Droter 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 enhanced statutory damages for willful infringement 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. 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. (Droter 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 enhanced 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 because of their infringements of the Copyright Protected Images. (Droter 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) per Defaulted Defendant per infringed Copyright. (Droter 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. (Droter Decl. ¶¶ 8, 11-12.) In this regard, Plaintiff's Copyright Protected Images, often representing recent product releases, have 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. (Droter 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. (Droter 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. (Droter 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. (Droter Decl. ¶ 8.) 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 willingness 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 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 as set forth in Exhibit 1 of the Droter Declaration. As set forth in Plaintiff's supporting

documentation, the Defaulted Defendants in this action should be found liable because of their willful infringement for each of the three (3) Federally Registered Copyrights. (Droter Decl. ¶ 12, Ex. 1) Accordingly, Plaintiff respectfully requests the Court enter an award of statutory damages per Defaulted Defendant per infringed Copyright Protected Image, which should be enhanced for willful infringement to 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. 42.] 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. 106.] 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.

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 as set forth in Exhibit 1 of the Droter Declaration per Defaulted Defendant per infringed Copyright Protected Image pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced statutory damages as set forth in Exhibit 1 of the Droter Declaration 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; and (4) such other relief as the Court deems just and proper.

DATED: June 12, 2025

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

Katherine M. Kuhn (Bar No. 6331405)

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of June 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, temu.

By: /s/ Joseph W. Droter
Joseph W. Droter (IL Bar No. 6329630)

No.	Seller	Seller's Contact Information
2	Aboutwomensclothing Mall ID 117493024949	841014546@qq.com
4	AILISA Mall ID 634418212390180	335838967@qq.com
10	An inch of light Mall ID 5244636459785	326046695@qq.com
11	Aoyuo Mall ID 634418211782315	957285357@qq.com
13	Attachedto Mall ID 634418211614001	2579717204@qq.com
18	Bestie Curvy Mall ID 634418211793903	656088392@qq.com
19	Birdfashionclothing Mall ID 1720489990037	17307288006@163.com
20	BM Fashion Mall ID 634418209993113	171093529@qq.com
22	Charm Clothes dress Mall ID 5686361796687	15271169658@163.com
23	Chen xun fu shi Mall ID 634418211514952	314238500@qq.com

No.	Seller	Seller's Contact Information
25	Clothesssssssss Mall ID 634418210983129	820205265@QQ.COM
26	Clothing Beauty Mall ID 244435390978	501747917@qq.com
28	Curvy Mall ID 146281689671	1964586221@qq.com
30	CYFashion Mall ID 70501117270	415441686@qq.com
38	EVFVB Mall ID 6208020471618	1595497569@qq.com
39	EXTRA Mall ID 51475333049	946028144@qq.com
40	FAIRYFAIR Mall ID 634418211321243	15821695135@163.com
41	FaNaLa Mall ID 4369635687830	assistanthmr@outlook.com
42	Fashion trend womens clothing Mall ID 634418212064133	750304476@qq.com
44	FridayGirl Mall ID 5745453647444	664816500@qq.com
45	Fu Yue studio Mall ID 5702086479922	250934861@qq.com
50	HX Ladies Fashion Mall ID 634418211073557	81330691@qq.com
53	JINGAOCHI GARMENT Mall ID 4920528197538	jinchil@jingaochi.com
55	Kaqiwa Mall ID 634418211452054	875701065@qq.com
58	LIUMM Mall ID 5602586604059	2671054193@qq.com
59	LUCKLILY Mall ID 5419829820946	lilyth_lala@163.com
60	MidandOldLife Mall ID 4933334847472	1964586221@qq.com
62	MNSPLusSize Mall ID 221222694131	520008441@qq.com
64	MUSHANGNI Mall ID 657564779675	13060849687@163.com
66	Nimanya Mall ID 38015328411	195365538@qq.com

No.	Seller	Seller's Contact Information
68	OUZINUO Mall ID 634418212249416	1039730175@qq.com
69	PENGWANG Mall ID 634418211898161	16620897212@163.com
72	SallyShaman Mall ID 66907202117	2973369404@QQ.COM
74	ShiJu Mall ID 634418210696248	332338406@qq.com
77	Taipingyang clothing trade Mall ID 5517776517295	2676023118@qq.com
78	Tomlover Mall ID 634418211532767	371215314@qq.com
80	Weeksix Mall ID 634418211982972	874826622@qq.com
82	Weinimeigongsi Mall ID 634418210064916	361859782@qq.com
86	XinMingyuan Mall ID 4605176695000	296719588@qq.com
87	XINGMUZHI Mall ID 280996421172	382894048@QQ.COM
88	Yihuimei Mall ID 5515939082246	441083093@qq.com
91	Yimi Le Clothing Mall ID 4837796854682	aa309684743@126.com
95	YQJ Mall ID 634418210495596	835321900@qq.com
96	YU closet Mall ID 634418211883875	3026179982@qq.com
100	Aixia Mall ID 634418211222545	2672094305@qq.com
102	Beimifushi Mall ID 4868068335702	823413988@qq.com
104	CoCo Modern Mall ID 234178238926	1053741336@qq.com
105	Coral clothing Mall ID 4945753884123	1129692531@qq.com
106	DEFZEAL Mall ID 233965839613	1940890460@qq.com
108	DNEATERSWIMSUIT Mall ID 6216470821533	1216269992@qq.com

No.	Seller	Seller's Contact Information
111	HAIMENGFUSHI Mall ID 5113012791727	751506823@qq.com
112	Haiyan clothing Mall ID 5310021745100	371239857@qq.com
113	HaoboFS Mall ID 634418211295908	415289553@qq.com
118	LINGDALIN Mall ID 634418211502374	781244771@qq.com
121	Mimotora Mall ID 6083030765636	271990700@qq.com
123	Necoo Mall ID 4915303824340	71344903@qq.com
125	Ngan Mall ID 6159760585886	213898938@qq.com
130	Sarahgirl Mall ID 634418211127885	70212550@qq.com
132	Swimoutlet Mall ID 4693600824584	464665936@qq.com
133	WesternMermaid Mall ID 634418212085208	baovivien@hotmail.com
137	YYSY Mall ID 4932898449539	939735728@qq.com
140	Beautymark Mall ID 6188818069552	497553619@qq.com
141	Cansheng Mall ID 3598609741036	a151797619881@163.com
142	Ceten Mall ID 634418211999891	dukes.cool@163.com
143	Coocona fashion Mall ID 5029364425608	taoxiaoxu2011@foxmail.com
147	DONGFANGSTYLE Mall ID 4944017706136	272889309@qq.com
148	DYstyle Mall ID 4546958804264	597235073@qq.com
153	Huishangying clothing Mall ID 4362225145628	506424237@qq.com
154	Imango Fashion Mall ID 179311289499	15634095518@163.com
157	JIAWEIYAFUZHUANGYOUXIANGONGSI Mall ID 126150994444	306561014@qq.com

No.	Seller	Seller's Contact Information
159	Lianshangying Mall ID 634418211878993	506424237@qq.com
165	Moving light fashion Mall ID 2397223686179	675040879@qq.com
166	Muthenswimsuit Mall ID 116006867106	6456286@qq.com
168	Omani fashion clothing Mall ID 6151345544238	506182304@qq.com
170	PrettyMoon Mall ID 147154680814	2643208471@qq.com
171	REAYOYO Mall ID 634418211078523	842052682@qq.com
173	Shley Mall ID 4687144028072	529261594@qq.com
175	Super fashions Mall ID 6207609503045	a18720690965@163.com
177	two red Mall ID 5103912475480	qianxi15814894088@163.com
180	WFUW Mall ID 634418210689975	3133503331@qq.com
181	VISHIE Mall ID 4829784114295	466350025@qq.com
182	Yasixuan Mall ID 4815406913658	64633678@qq.com
183	YEB Mall ID 5715568560666	469625137@qq.com
185	YOYOLIU Mall ID 5897658181900	825050748@qq.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-01689-ARW-JC

Honorable Judge Andrea R. Wood

Magistrate Jeffrey Cole

**DECLARATION OF JOSEPH W. DROTER IN SUPPORT OF
MOTION FOR DEFAULT JUDGMENT**

I, Joseph W. Droter, of the City of Chicago, in the State of Illinois, 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 eighty-four (84) non-appearing Defendants Identified in Schedule "A" (the "Motion") against which the Court has previously granted Entry of Clerk's Default on May 27, 2025 [Dkt. No. 106] 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 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, or had their previously filed answers/counterclaims stricken for failure to show cause, 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 May 27, 2025 against the Defaulted Defendants. [Dkt. No. 106.] 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. 24.]

5. Plaintiff's asserted claims for relief in this action involve the intentional, willful infringement of the following three (3) federally registered copyrights; VA0002379907, VA0002379894, and VA0002379930 (the "Copyright Protected Images").

6. As alleged in the Complaint, the Defaulted Defendants have displayed, without authorization, the Copyright Protected Images on the Temu.com online sales platform (the "Platform") to market and sell knockoff, competing products resembling Plaintiff's authentic Rotita brand products through their online stores using Rotita's copyrighted photos (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 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 or stopped appearing and defending, which resulted in the Court ordering Entry of Clerk's Default against them. [Dkt. No. 106.] 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. Attached hereto as "**Exhibit 1**" is the assessed damages provided by the third-party platform temu. The only access Plaintiff has to verifiable sales records is number of units sold, Plaintiff calculated sales based off the price per item at the time of pre-suit infringement analysis.

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. 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. The named Schedule "A" defendants in this and 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 for their infringement of the Copyright Protected Images.

11. Plaintiff has alleged, and has offered proof, that the Defaulted Defendants have engaged in the infringement of the Copyright Protected Images, and 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 enhanced statutory damages in the amounts laid out in **Exhibit 1** attached 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 number of infringing units sold, the estimated infringing total revenue, 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: June 12, 2025

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of June 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, temu.

By: /s/ Joseph W. Droter
Joseph W. Droter (IL Bar No. 6329630)

No.	Seller	Seller's Contact Information
2	Aboutwomensclothing Mall ID 117493024949	841014546@qq.com
4	AILISA Mall ID 634418212390180	335838967@qq.com
10	An inch of light Mall ID 5244636459785	326046695@qq.com
11	Aoyuo Mall ID 634418211782315	957285357@qq.com
13	Attachedto Mall ID 634418211614001	2579717204@qq.com
18	Bestie Curvy Mall ID 634418211793903	656088392@qq.com
19	Birdfashionclothing Mall ID 1720489990037	17307288006@163.com
20	BM Fashion Mall ID 634418209993113	171093529@qq.com
22	Charm Clothes dress Mall ID 5686361796687	15271169658@163.com
23	Chen xun fu shi Mall ID 634418211514952	314238500@qq.com
25	Clothesssssssss Mall ID 634418210983129	820205265@QQ.COM

No.	Seller	Seller's Contact Information
26	Clothing Beauty Mall ID 244435390978	501747917@qq.com
28	Curvy Mall ID 146281689671	1964586221@qq.com
30	CYFashion Mall ID 70501117270	415441686@qq.com
38	EVFVB Mall ID 6208020471618	1595497569@qq.com
39	EXTRA Mall ID 51475333049	946028144@qq.com
40	FAIRYFAIR Mall ID 634418211321243	15821695135@163.com
41	FaNaLa Mall ID 4369635687830	assistanthmr@outlook.com
42	Fashion trend womens clothing Mall ID 634418212064133	750304476@qq.com
44	FridayGirl Mall ID 5745453647444	664816500@qq.com
45	Fu Yue studio Mall ID 5702086479922	250934861@qq.com
50	HX Ladies Fashion Mall ID 634418211073557	81330691@qq.com
53	JINGAOCHI GARMENT Mall ID 4920528197538	jinchil@jingaochi.com
55	Kaqiwa Mall ID 634418211452054	875701065@qq.com
58	LIUMM Mall ID 5602586604059	2671054193@qq.com
59	LUCKLILY Mall ID 5419829820946	lilyth_lala@163.com
60	MidandOldLife Mall ID 4933334847472	1964586221@qq.com
62	MNSPLusSize Mall ID 221222694131	520008441@qq.com
64	MUSHANGNI Mall ID 657564779675	13060849687@163.com
66	Nimanya Mall ID 38015328411	195365538@qq.com
68	OUZINUO Mall ID 634418212249416	1039730175@qq.com
69	PENGWANG Mall ID 634418211898161	16620897212@163.com

No.	Seller	Seller's Contact Information
72	SallyShaman Mall ID 66907202117	2973369404@QQ.COM
74	ShiJu Mall ID 634418210696248	332338406@qq.com
77	Taipingyang clothing trade Mall ID 5517776517295	2676023118@qq.com
78	Tomlover Mall ID 634418211532767	371215314@qq.com
80	Weeksix Mall ID 634418211982972	874826622@qq.com
82	Weinimeigongsi Mall ID 634418210064916	361859782@qq.com
86	XinMingyuan Mall ID 4605176695000	296719588@qq.com
87	XINGMUZHI Mall ID 280996421172	382894048@QQ.COM
88	Yihuimei Mall ID 5515939082246	441083093@qq.com
91	Yimi Le Clothing Mall ID 4837796854682	aa309684743@126.com
95	YQJ Mall ID 634418210495596	835321900@qq.com
96	YU closet Mall ID 634418211883875	3026179982@qq.com
100	Aixia Mall ID 634418211222545	2672094305@qq.com
102	Beimifushi Mall ID 4868068335702	823413988@qq.com
104	CoCo Modern Mall ID 234178238926	1053741336@qq.com
105	Coral clothing Mall ID 4945753884123	1129692531@qq.com
106	DEFZEAL Mall ID 233965839613	1940890460@qq.com
108	DNEATERSWIMSUIT Mall ID 6216470821533	1216269992@qq.com
111	HAIMENGFUSHI Mall ID 5113012791727	751506823@qq.com
112	Haiyan clothing Mall ID 5310021745100	371239857@qq.com
113	HaoboFS Mall ID 634418211295908	415289553@qq.com

No.	Seller	Seller's Contact Information
118	LINGDALIN Mall ID 634418211502374	781244771@qq.com
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123	Necoo Mall ID 4915303824340	71344903@qq.com
125	Ngan Mall ID 6159760585886	213898938@qq.com
130	Sarahgirl Mall ID 634418211127885	70212550@qq.com
132	Swimoutlet Mall ID 4693600824584	464665936@qq.com
133	WesternMermaid Mall ID 634418212085208	baovivien@hotmail.com
137	YYSY Mall ID 4932898449539	939735728@qq.com
140	Beautymark Mall ID 6188818069552	497553619@qq.com
141	Cansheng Mall ID 3598609741036	a151797619881@163.com
142	Ceten Mall ID 634418211999891	dukes.cool@163.com
143	Coocona fashion Mall ID 5029364425608	taoxiaoxu2011@foxmail.com
147	DONGFANGSTYLE Mall ID 4944017706136	272889309@qq.com
148	DYstyle Mall ID 4546958804264	597235073@qq.com
153	Huishangying clothing Mall ID 4362225145628	506424237@qq.com
154	Imango Fashion Mall ID 179311289499	15634095518@163.com
157	JIAWEIYAFUZHUANGYOUXIANGONGSI Mall ID 126150994444	306561014@qq.com
159	Lianshangying Mall ID 634418211878993	506424237@qq.com
165	Moving light fashion Mall ID 2397223686179	675040879@qq.com
166	Muthenswimsuit Mall ID 116006867106	6456286@qq.com
168	Omani fashion clothing Mall ID 6151345544238	506182304@qq.com

No.	Seller	Seller's Contact Information
170	PrettyMoon Mall ID 147154680814	2643208471@qq.com
171	REAYOYO Mall ID 634418211078523	842052682@qq.com
173	Shley Mall ID 4687144028072	529261594@qq.com
175	Super fashions Mall ID 6207609503045	a18720690965@163.com
177	two red Mall ID 5103912475480	qianxi15814894088@163.com
180	WFUW Mall ID 634418210689975	3133503331@qq.com
181	VISHIE Mall ID 4829784114295	466350025@qq.com
182	Yasixuan Mall ID 4815406913658	64633678@qq.com
183	YEB Mall ID 5715568560666	469625137@qq.com
185	YOYOLIU Mall ID 5897658181900	825050748@qq.com

Exhibit 1

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

84 Defaulted Defendants

Copyrights Infringed: VA0002379907, VA0002379894, and VA0002379930

No.	Temu Store Name/Defendant Copyright Infringed	Units Sold Per Temu Data/	Estimated Infringement Sales Amount	Statutory Amount Requested	Enhanced x3 for Willful Infringement Total Requested
2	Aboutwomensclothing Mall ID 117493024949 VA0002379907 VA0002379930	144	\$1,334.06	\$1,000	\$3,000
4	AILISA Mall ID 634418212390180 VA0002379907	116	\$866.52	\$800	\$2,400
10	An inch of light Mall ID 5244636459785 VA0002379907	23	\$351.67	\$750	\$2,250
11	Aoyuo Mall ID 634418211782315 VA0002379907	1,334	\$11,312.32	\$10,000	\$30,000
13	Attachedto Mall ID 634418211614001 VA0002379907	91	\$999.18	\$900	\$2,700
18	Bestie Curvy Mall ID 634418211793903 VA0002379907	69	\$861.12	\$800	\$2,400
19	Birdfashionclothing Mall ID 1720489990037 VA0002379907 VA0002379894	1,782	\$17,991.10	\$15,000	\$45,000
20	BM Fashion Mall ID 634418209993113 VA0002379907	850	\$9,758.00	\$9,000	\$27,000
22	Charm Clothes dress Mall ID 5686361796687 VA0002379907	1	\$10.99	\$750	\$2,250
23	Chen xun fu shi Mall ID 634418211514952 VA0002379907	42	\$360.58	\$750	\$2,250
25	Clothessssssss Mall ID 634418210983129 VA0002379907	144	\$1,445.16	\$1,000	\$3,000
26	Clothing Beauty Mall ID 244435390978 VA0002379907	1,512	\$14,993	\$14,000	\$42,000

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

84 Defaulted Defendants

No.	Temu Store Name/Defendant Copyright Infringed	Units Sold Per Temu Data/	Estimated Infringement Sales Amount	Statutory Amount Requested	Enhanced x3 for Willful Infringement Total Requested
28	Curvy Mall ID 146281689671 VA0002379907	5,291	\$60,341.68	\$30,000	\$90,000
30	CYFashion Mall ID 70501117270 VA0002379907	1,097	\$18,078.56	\$15,000	\$45,000
38	EVFVB Mall ID 6208020471618 VA0002379907	593	\$5,325.14	\$5,000	\$15,000
39	EXTRA Mall ID 51475333049 VA0002379907	150	\$1,198.50	\$1,000	\$3,000
40	FAIRYFAIR Mall ID 634418211321243 VA0002379907	125	\$1,347.75	\$1,000	\$3,000
41	FaNaLa Mall ID 4369635687830 VA0002379907	113	\$958.37	\$1,000	\$3,000
42	Fashion trend womens clothing Mall ID 634418212064133 VA0002379907	100	\$899.00	\$1,000	\$3,000
44	FridayGirl Mall ID 5745453647444 VA0002379907 VA0002379930	78	\$967.94	\$1,000	\$3,000
45	Fu Yue studio Mall ID 5702086479922 VA0002379907	7	\$27.23	\$750	2,400
50	HX Ladies Fashion Mall ID 634418211073557 VA0002379907	61	\$791.78	\$750	\$2,250
53	JINGAOCHI GARMENT Mall ID 4920528197538 VA0002379907	45	\$337.05	\$750	\$2,250
55	Kaqiwa Mall ID 634418211452054 VA0002379907	35	\$349.30	\$750	\$2,250
58	LIUMM Mall ID 5602586604059 VA0002379907	7,479	\$97,077.42	\$30,000	\$90,000

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

84 Defaulted Defendants

No.	Temu Store Name/Defendant Copyright Infringed	Units Sold Per Temu Data/	Estimated Infringement Sales Amount	Statutory Amount Requested	Enhanced x3 for Willful Infringement Total Requested
59	LUCKLILY Mall ID 5419829820946 VA0002379907	50	\$424.50	\$750	\$2,250
60	MidandOldLife Mall ID 4933334847472 VA0002379907	76	\$910.48	\$900	\$2,700
62	MNSPLusSize Mall ID 221222694131 VA0002379907	1,260	\$14,437.26	\$12,000	\$36,000
64	MUSHANGNI Mall ID 657564779675 VA0002379907	158	\$1,436.22	\$1,000	\$3,000
66	Nimanya Mall ID 38015328411 VA0002379907	527	\$5,259.46	\$5,000	\$15,000
68	OUZINUO Mall ID 634418212249416 VA0002379907	13,565	\$119,236.35	\$30,000	\$90,000
69	PENGWANG Mall ID 634418211898161 VA0002379907	1,472	\$14,690	\$14,000	\$42,000
72	SallyShaman Mall ID 66907202117 VA0002379907	119	\$1,129.31	\$1,000	\$3,000
74	ShiJu Mall ID 634418210696248 VA0002379907	1,934	\$13,479.98	\$12,000	\$36,000
77	Taipingyang clothing trade Mall ID 5517776517295 VA0002379907	103	\$1,079.44	\$1,000	\$3,000
78	Tomlover Mall ID 634418211532767 VA0002379907 VA0002379930	416	\$7,125.94	\$7,000	\$21,000
80	Weeksix Mall ID 634418211982972 VA0002379907	1,374	\$11,527.86	\$11,000	\$33,000
82	Weinimeigongsi Mall ID 634418210064916 VA0002379907 VA0002379930	2,201	\$15,349.12	\$15,000	\$45,000

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

84 Defaulted Defendants

No.	Temu Store Name/Defendant Copyright Infringed	Units Sold Per Temu Data/	Estimated Infringement Sales Amount	Statutory Amount Requested	Enhanced x3 for Willful Infringement Total Requested
86	XinMingyuan Mall ID 4605176695000 VA0002379907	489	\$4,880.22	\$4,000	\$12,000
87	XINGMUZHI Mall ID 280996421172 VA0002379907	26	209.56	\$750	\$2,250
88	Yihuimei Mall ID 5515939082246 VA0002379907	15	97.35	\$750	\$2,250
91	Yimi Le Clothing Mall ID 4837796854682 VA0002379907 VA0002379930	63	\$428.37	\$750	\$2,250
95	YQJ Mall ID 634418210495596 VA0002379907	5,356	\$58,808.88	\$30,000	\$90,000
96	YU closet Mall ID 634418211883875 VA0002379907	220	\$2,635.60	\$2,000	\$6,000
100	Aixia Mall ID 634418211222545 VA0002379894	202	\$2,341.18	\$2,000	\$6,000
102	Beimifushi Mall ID 4868068335702 VA0002379894	45	\$584.55	\$750	\$2,250
104	CoCo Modern Mall ID 234178238926 VA0002379894	4	\$43.96	\$750	\$2,250
105	Coral clothing Mall ID 4945753884123 VA0002379894	199	\$2,284.52	\$2,000	\$6,000
106	DEFZEAL Mall ID 233965839613 VA0002379894	5,053	\$51,031.65	\$30,000	\$90,000
108	DNEATERSWIMSUIT Mall ID 6216470821533 VA0002379894	340	\$3,563.20	\$3,000	\$9,000
111	HAIMENGFUSHI Mall ID 5113012791727 VA0002379894	185	\$2,308.80	\$2,000	\$6,000

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

84 Defaulted Defendants

No.	Temu Store Name/Defendant Copyright Infringed	Units Sold Per Temu Data/	Estimated Infringement Sales Amount	Statutory Amount Requested	Enhanced x3 for Willful Infringement Total Requested
112	Haiyan clothing Mall ID 5310021745100 VA0002379894	19	\$218.12	\$750	\$2,250
113	HaoboFS Mall ID 634418211295908 VA0002379894	60	\$779.40	\$750	\$2,250
118	LINGDALIN Mall ID 634418211502374 VA0002379894	345	\$13,096.92	\$12,000	\$36,000
121	Mimotora Mall ID 6083030765636 VA0002379894	103	\$1,037.21	\$1,000	\$3,000
123	Necoo Mall ID 4915303824340 VA0002379894	493	\$7,138.64	\$7,000	\$21,000
125	Ngan Mall ID 6159760585886 VA0002379894	4131	\$60,952.38	\$30,000	\$90,000
130	Sarahgirl Mall ID 634418211127885 VA0002379894	26	\$194.74	\$750	\$2,250
132	Swimoutlet Mall ID 4693600824584 VA0002379894	45	\$611.55	\$750	\$2,250
133	WesternMermaid Mall ID 634418212085208 VA0002379894	201	\$3,412.98	\$3,000	\$9,000
137	YYSY Mall ID 4932898449539 VA0002379894	185	\$3,233.8	\$3,000	\$9,000
140	Beautymark Mall ID 6188818069552 VA0002379930	242	\$1,933.58	\$1,500	\$4,500
141	Cansheng Mall ID 3598609741036 VA0002379930	632	\$7,255.36	\$7,000	\$21,000
142	Ceten Mall ID 634418211999891 VA0002379930	5	\$51.45	\$750	\$2,250

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

84 Defaulted Defendants

No.	Temu Store Name/Defendant Copyright Infringed	Units Sold Per Temu Data/	Estimated Infringement Sales Amount	Statutory Amount Requested	Enhanced x3 for Willful Infringement Total Requested
143	Coocona fashion Mall ID 5029364425608 VA0002379930	10	\$114.9	\$750	\$2,250
147	DONGFANGSTYLE Mall ID 4944017706136 VA0002379930	115	\$929.85	\$750	\$2,250
148	DYstyle Mall ID 4546958804264 VA0002379930	5	\$47.45	\$750	\$2,250
153	Huishangying clothing Mall ID 4362225145628 VA0002379930	950	\$13,765.5	\$13,000	\$39,000
154	Imango Fashion Mall ID 179311289499 VA0002379930	13	\$155.87	\$750	\$2,250
157	JIAWEIYAFUZHUANGY OUXIANGONGSI Mall ID 126150994444 VA0002379930	58	\$550.42	\$750	\$2,250
159	Lianshangying Mall ID 634418211878993 VA0002379930	29	\$362.21	\$750	\$2,250
165	Moving light fashion Mall ID 2397223686179 VA0002379930	46	\$257.14	\$750	\$2,250
166	Muthenswimsuit Mall ID 116006867106 VA0002379930	213	\$1,699.74	\$1,500	\$4,500
168	Omani fashion clothing Mall ID 6151345544238 VA0002379930	286	\$2,456.74	\$2,000	\$6,000
170	PrettyMoon Mall ID 147154680814 VA0002379930	9026	\$102,108.89	\$30,000	\$90,000
171	REAYOYO Mall ID 634418211078523 VA0002379930	11	\$71.39	\$750	\$2,250
173	Shley Mall ID 4687144028072 VA0002379930	20	\$119.8	\$750	\$2,250

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

84 Defaulted Defendants

No.	Temu Store Name/Defendant Copyright Infringed	Units Sold Per Temu Data/	Estimated Infringement Sales Amount	Statutory Amount Requested	Enhanced x3 for Willful Infringement Total Requested
175	Super fashions Mall ID 6207609503045 VA0002379930	101	\$786.79	\$750	\$2,250
177	two red Mall ID 5103912475480 VA0002379930	87	\$601.63	\$750	\$2,250
180	WFUW Mall ID 634418210689975 VA0002379930	124	\$1,299.52	\$1,000	\$3,000
181	VISHIE Mall ID 4829784114295 VA0002379930	131	\$979.88	\$900	\$2,700
182	Yasixuan Mall ID 4815406913658 VA0002379930	99	\$642.51	\$750	\$2,250
183	YEB Mall ID 5715568560666 VA0002379930	17	\$161.16	\$750	\$2,250
185	YOYOLIU Mall ID 5897658181900 VA0002379930	653	\$4,890.97	\$4,000	\$12,000
			TOTAL:	\$462,550	\$1,387,800

**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-01689-ARW-JC

Honorable Judge Andrea R. Wood

Magistrate Jeffrey Cole

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, TikTok and Temu (the "Platform"), which is the online sales platform at issue in this action. Plaintiff does not sell its products through any one of the proceeding retailers. Rather, Plaintiff only sells its genuine Rotita brand products through its website rotita.com.

6. 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: VA0002379907, VA0002379894, and VA0002379930 (the "Copyright Protected Images").

7. 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 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.

8. 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.

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 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 June 12, 2025, in Hong Kong.

By: /s/ Liangjie Li
LIANGJIE LI

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of June 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, temu.

By: /s/ Joseph W. Droter

Joseph W. Droter (IL Bar No. 6329630)

No.	Seller	Seller's Contact Information
2	Aboutwomensclothing Mall ID 117493024949	841014546@qq.com
4	AILISA Mall ID 634418212390180	335838967@qq.com
10	An inch of light Mall ID 5244636459785	326046695@qq.com
11	Aoyuo Mall ID 634418211782315	957285357@qq.com
13	Attachedto Mall ID 634418211614001	2579717204@qq.com
18	Bestie Curvy Mall ID 634418211793903	656088392@qq.com
19	Birdfashionclothing Mall ID 1720489990037	17307288006@163.com
20	BM Fashion Mall ID 634418209993113	171093529@qq.com
22	Charm Clothes dress Mall ID 5686361796687	15271169658@163.com
23	Chen xun fu shi Mall ID 634418211514952	314238500@qq.com
25	Clothessssssss Mall ID 634418210983129	820205265@QQ.COM

No.	Seller	Seller's Contact Information
26	Clothing Beauty Mall ID 244435390978	501747917@qq.com
28	Curvy Mall ID 146281689671	1964586221@qq.com
30	CYFashion Mall ID 70501117270	415441686@qq.com
38	EVFVB Mall ID 6208020471618	1595497569@qq.com
39	EXTRA Mall ID 51475333049	946028144@qq.com
40	FAIRYFAIR Mall ID 634418211321243	15821695135@163.com
41	FaNaLa Mall ID 4369635687830	assistanthmr@outlook.com
42	Fashion trend womens clothing Mall ID 634418212064133	750304476@qq.com
44	FridayGirl Mall ID 5745453647444	664816500@qq.com
45	Fu Yue studio Mall ID 5702086479922	250934861@qq.com
50	HX Ladies Fashion Mall ID 634418211073557	81330691@qq.com
53	JINGAOCHI GARMENT Mall ID 4920528197538	jinchil@jingaochi.com
55	Kaqiwa Mall ID 634418211452054	875701065@qq.com
58	LIUMM Mall ID 5602586604059	2671054193@qq.com
59	LUCKLILY Mall ID 5419829820946	lilyth_lala@163.com
60	MidandOldLife Mall ID 4933334847472	1964586221@qq.com
62	MNSPLusSize Mall ID 221222694131	520008441@qq.com
64	MUSHANGNI Mall ID 657564779675	13060849687@163.com
66	Nimanya Mall ID 38015328411	195365538@qq.com
68	OUZINUO Mall ID 634418212249416	1039730175@qq.com

No.	Seller	Seller's Contact Information
69	PENGWANG Mall ID 634418211898161	16620897212@163.com
72	SallyShaman Mall ID 66907202117	2973369404@QQ.COM
74	ShiJu Mall ID 634418210696248	332338406@qq.com
77	Taipingyang clothing trade Mall ID 5517776517295	2676023118@qq.com
78	Tomlover Mall ID 634418211532767	371215314@qq.com
80	Weeksix Mall ID 634418211982972	874826622@qq.com
82	Weinimeigongsi Mall ID 634418210064916	361859782@qq.com
86	XinMingyuan Mall ID 4605176695000	296719588@qq.com
87	XINGMUZHI Mall ID 280996421172	382894048@QQ.COM
88	Yihuimei Mall ID 5515939082246	441083093@qq.com
91	Yimi Le Clothing Mall ID 4837796854682	aa309684743@126.com
95	YQJ Mall ID 634418210495596	835321900@qq.com
96	YU closet Mall ID 634418211883875	3026179982@qq.com
100	Aixia Mall ID 634418211222545	2672094305@qq.com
102	Beimifushi Mall ID 4868068335702	823413988@qq.com
104	CoCo Modern Mall ID 234178238926	1053741336@qq.com
105	Coral clothing Mall ID 4945753884123	1129692531@qq.com
106	DEFZEAL Mall ID 233965839613	1940890460@qq.com
108	DNEATERSWIMSUIT Mall ID 6216470821533	1216269992@qq.com
111	HAIMENGFUSHI Mall ID 5113012791727	751506823@qq.com

No.	Seller	Seller's Contact Information
112	Haiyan clothing Mall ID 5310021745100	371239857@qq.com
113	HaoboFS Mall ID 634418211295908	415289553@qq.com
118	LINGDALIN Mall ID 634418211502374	781244771@qq.com
121	Mimotora Mall ID 6083030765636	271990700@qq.com
123	Necoo Mall ID 4915303824340	71344903@qq.com
125	Ngan Mall ID 6159760585886	213898938@qq.com
130	Sarahgirl Mall ID 634418211127885	70212550@qq.com
132	Swimoutlet Mall ID 4693600824584	464665936@qq.com
133	WesternMermaid Mall ID 634418212085208	baovivien@hotmail.com
137	YYSY Mall ID 4932898449539	939735728@qq.com
140	Beautymark Mall ID 6188818069552	497553619@qq.com
141	Cansheng Mall ID 3598609741036	a151797619881@163.com
142	Ceten Mall ID 634418211999891	dukes.cool@163.com
143	Coocona fashion Mall ID 5029364425608	taoxiaoxu2011@foxmail.com
147	DONGFANGSTYLE Mall ID 4944017706136	272889309@qq.com
148	DYstyle Mall ID 4546958804264	597235073@qq.com
153	Huishangying clothing Mall ID 4362225145628	506424237@qq.com
154	Imango Fashion Mall ID 179311289499	15634095518@163.com
157	JIAWEIYAFUZHUANGYOUXIANGONGSI Mall ID 126150994444	306561014@qq.com
159	Lianshangying Mall ID 634418211878993	506424237@qq.com

No.	Seller	Seller's Contact Information
165	Moving light fashion Mall ID 2397223686179	675040879@qq.com
166	Muthenswimsuit Mall ID 116006867106	6456286@qq.com
168	Omani fashion clothing Mall ID 6151345544238	506182304@qq.com
170	PrettyMoon Mall ID 147154680814	2643208471@qq.com
171	REAYOYO Mall ID 634418211078523	842052682@qq.com
173	Shley Mall ID 4687144028072	529261594@qq.com
175	Super fashions Mall ID 6207609503045	a18720690965@163.com
177	two red Mall ID 5103912475480	qianxi15814894088@163.com
180	WFUW Mall ID 634418210689975	3133503331@qq.com
181	VISHIE Mall ID 4829784114295	466350025@qq.com
182	Yasixuan Mall ID 4815406913658	64633678@qq.com
183	YEB Mall ID 5715568560666	469625137@qq.com
185	YOYOLIU Mall ID 5897658181900	825050748@qq.com