

**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-01807-VMK**

**Honorable Virginia M. Kendall  
Magistrate Gabriel A. Fuentes**

Hearing Date: November 26, 2024  
Hearing Time: 9:30 AM CT  
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 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: November 21, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Bar No. 6299408)

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of November 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. 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, Alibaba.

No.	Seller	Seller's Contact Information
1	Guangzhou Baiyun District Ka Ya Te Garment Factory Seller Ali Id 2318142448 Member Id hdchris	bzpswo@my.com
2	Alibaba (zhongguo)wangluojishuyouxiangongsi Seller Ali Id 2217241433921 Member Id tr1566403965xika	202401190001@ggo.net
5	Beijing Boningsai Trading Co., Ltd. Seller Ali Id 2214575013601 Member Id bjbns	admin@boningsai.com
6	Changsha Ox Arts & Crafts Co., Ltd. Seller Ali Id 2210557687578 Member Id doomedhappy	happy@doomedhappy.com
7	Changsha Zhezhe Clothing Co., Ltd. Seller Ali Id 2212382857597 Member Id cszhezhe	changshazhezhe@163.com
9	Changzhou Swimshark Garments Co., Ltd. Seller Ali Id 2215875044329 Member Id swimsk	panli@swimsk.com
11	Chongqing Gooney Information Technology Co.,ltd. Seller Ali Id 2212465769559 Member Id gooney	ganray01@163.com
12	Chongqing Xuesheng Clothing Ltd., Company Seller Ali Id 2214069948280 Member Id cqxszfz	<u>2083858534@qq.com</u>
13	Dadao Gonghe (Shenzhen) Garment Co., Ltd. Seller Ali Id 2213257986992 Member Id ddghfz	944291982@qq.com
14	Dalian Tianzige Dress Design Co., Ltd. Seller Ali Id 2212658274015 Member Id dltzg	elva@tzgkids.com
16	Dongguan Boxiang Garment Co., Ltd. Seller Ali Id 3567299678 Member Id boxiang9999	boxiang@boxiang9999.com
18	Dongguan Chengwang Trading Co., Ltd. Seller Ali Id 2213327338183 Member Id dgchengwang	331822500@qq.com
19	Dongguan Chuangdian Garment Co., Ltd.	13922518923@139.com

No.	Seller	Seller's Contact Information
	Seller Ali Id 2215060147230 Member Id cd13903013480	
21	Dongguan City Jingyu Apparel Co., Ltd. Seller Ali Id 2212268638888 Member Id jingyuapparel	info@jingyuapparel.com
22	Dongguan Dafeng Garment Co., Ltd. Seller Ali Id 2213948562126 Member Id neixiu	a18681184599@163.com
23	Dongguan Dalang Muzhifeng Trade Department Seller Ali Id 2216424582546 Member Id mzf	2390635998@qq.com
26	Dongguan Fnjia Knitwear Co., Ltd. Seller Ali Id 2208410919462 Member Id dgfunnysports	irene@dgunnysports.com
27	DONGGUAN FUXING KNITTING GARMENTS CO.,LTD Seller Ali Id 2215223048315 Member Id dgfxknitting	dickenzou@foxmail.com
28	Dongguan Gina Import & Export Co., Ltd Seller Ali Id 3243578752 Member Id chinagina	sales09@fashionregina.com
29	Dongguan Ginwen Garment Co., Ltd Seller Ali Id 17381384181 Member Id cn1001005626	annaye1@hotmail.com
38	Dongguan Jinghong Foreign Trade Clothing Co., Ltd. Seller Ali Id 2208757504323 Member Id jh13071306429	2706626416@qq.com
40	Dongguan Kaqi Garment Co., Ltd. Seller Ali Id 2208456705434 Member Id kaachii	billy@kaachiiapparel.com
42	Dongguan Liziyang Clothing Co., Ltd. Seller Ali Id 2213243414083 Member Id lilian2018	jackson@lilianfashion.cn
43	Dongguan Manni Dress Co., Ltd. Seller Ali Id 17380611704 Member Id dgmanni	sunny@dgmanni.com
44	Dongguan Meiya Apparel Co., Ltd. Seller Ali Id 2215399707289 Member Id dongguanmeiya	admin@meiyapparel.com
45	Dongguan Miao Sheng Clothing Co., Ltd. Seller Ali Id 2214395586878 Member Id dgmiaosheng	xiaomin@miaoshengapparel.com
46	Dongguan Mingge Knitting Garment Co., Ltd. Seller Ali Id 2211090413966 Member Id zgmg	mg13652688665@163.com
47	Dongguan Qian Yong Clothing Co., Ltd. Seller Ali Id 2216898085668 Member Id dgsqyfs	724560255@qq.com
48	Dongguan Qianxi Technology Co., Ltd. Seller Ali Id 2214568598962 Member Id aqianxi	admin@aqianxi.vip
49	Dongguan Qishun Clothing Co., Ltd. Seller Ali Id 2212388689453 Member Id shenyanci	yanci15999802190@163.com
50	Dongguan Ruichi Fashion Co., Ltd. Seller Ali Id 2215035387795 Member Id ruichifashion	sales@ruichifashion.com
51	Dongguan Sanniu Clothing Co., Ltd	2991881397@qq.com

No.	Seller	Seller's Contact Information
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53	Dongguan Shengde Clothing Co., Ltd. Seller Ali Id 2211817438199 Member Id shengde525	<a href="mailto:yigao@yigao.cn">yigao@yigao.cn</a>
54	Dongguan Shenjie Clothing Co., Ltd Seller Ali Id 2210011994102 Member Id shenjiefushi	<a href="mailto:o13877544009@163.com">o13877544009@163.com</a>
55	Dongguan Shinny Import & Export Ltd. Seller Ali Id 3594997623 Member Id shinnyfashion	<a href="mailto:2803111366@qq.com">2803111366@qq.com</a>
56	Dongguan Sky & Star Fashion Co., Ltd. Seller Ali Id 2175593641 Member Id skyandstar	<a href="mailto:cissyzen@skystarfashion.com">cissyzen@skystarfashion.com</a>
57	Dongguan Sun Denean Clothing Co., Ltd. Seller Ali Id 2211209465658 Member Id sundenean	<a href="mailto:star@seeusoongroup.com">star@seeusoongroup.com</a>
58	Dongguan VF Garment Co., Ltd. Seller Ali Id 3251836537 Member Id dgweifan	<a href="mailto:info@vfgarment.com">info@vfgarment.com</a>
59	Dongguan Xibolin Garment Co., Ltd Seller Ali Id 2213859086223 Member Id dgxibolin	<a href="mailto:hipony@yeah.net">hipony@yeah.net</a>
60	Dongguan Xiyi Clothing Co., Ltd. Seller Ali Id 2215196732170 Member Id xiyifs	<a href="mailto:ol32qwelur@luea.adso">ol32qwelur@luea.adso</a>
61	Dongguan Yalen Clothing Co., Ltd. Seller Ali Id 2051263593 Member Id dgyalen	<a href="mailto:ginahuang@yalenfashion.com">ginahuang@yalenfashion.com</a>
66	Dongguan YiYang Clothing Co., Ltd Seller Ali Id 2214233222935 Member Id yiyang6688	<a href="mailto:46163002@qq.com">46163002@qq.com</a>
68	Dongguan Yunya Fashion Co., Ltd. Seller Ali Id 3027741321 Member Id yunyafashion	<a href="mailto:jimmy@yunyafashion.com">jimmy@yunyafashion.com</a>
69	Dongguan Zhongyi Clothing Co., Ltd. Seller Ali Id 2207771777539 Member Id cnzhongyifashion	<a href="mailto:lili@yilifashion.com">lili@yilifashion.com</a>
71	Foshan Faoumei Garment Co., Ltd Seller Ali Id 2215261348923 Member Id bellefille168	<a href="mailto:15899822128@163.com">15899822128@163.com</a>
73	Fujian Century Yeung Pok Import And Export Co., Ltd. Seller Ali Id 2211576783717 Member Id yeungpok	<a href="mailto:zhengbeijing1980@163.com">zhengbeijing1980@163.com</a>
74	Fujian Rosinandi E-Commerce Co., Ltd. Seller Ali Id 2215208724915 Member Id lxnd	<a href="mailto:andre@gotoptrade.com">andre@gotoptrade.com</a>
76	Fushun Nxcaps Clothing Company Limited Seller Ali Id 2211201734281 Member Id hatclothing	<a href="mailto:christine@hatclothing.com">christine@hatclothing.com</a>
77	Fuzhou Kuajin International Trading Co., Ltd. Seller Ali Id 2204184152389 Member Id kuajin	<a href="mailto:kuajinlanna@aliyun.com">kuajinlanna@aliyun.com</a>
81	Ganzhou Jianghuchuan Trade Co., Ltd. Seller Ali Id 2215676632942 Member Id oldmoney	<a href="mailto:gzhjc6688@163.com">gzhjc6688@163.com</a>
85	Guangdong Qian Lu Garment Co., Ltd. Seller Ali Id 2215490125058 Member Id qianlu88	<a href="mailto:mz657667203@163.com">mz657667203@163.com</a>
86	Guangxi Lingzhi Trading Co., Ltd. Seller Ali Id 2217021515197 Member Id lexus15778028546	<a href="mailto:15778028546@163.com">15778028546@163.com</a>

No.	Seller	Seller's Contact Information
87	Guangxi Pingxiang Honghai Technology Co.,ltd Seller Ali Id 2212548580583 Member Id honghai2021	pxhonghai@163.com
88	Guangxi Xiongxiong Technology Co., Ltd Seller Ali Id 2216563229225 Member Id xxkeji	13877135644@163.com
89	Guangzhou Aifuli Clothing Co., Ltd. Seller Ali Id 2213000738174 Member Id cnnorboe	ifreealice01@gmail.com
91	Guangzhou Baige Clothing Co., Ltd Seller Ali Id 2212788981262 Member Id bgfs26	821403372@qq.com
93	Guangzhou Blue Star Clothing Co., Ltd. Seller Ali Id 2208002630361 Member Id lanzhixing	18028139508@139.com
94	Guangzhou Bluewings Technology Co., Ltd. Seller Ali Id 2214794817045 Member Id gzbluewings	bluewingscoltd@gmail.com
95	Guangzhou Chu Feiya Trade Co., Ltd. Seller Ali Id 2209760865360 Member Id chufeiya	zhengyanling@chufeiya.com
97	Guangzhou Domin Company Limited Seller Ali Id 17380108727 Member Id gzdmin	sales01@gzdomin.com
98	Guangzhou Duojin Clothing Co., Ltd Seller Ali Id 2210030828845 Member Id duojin	1226695139@qq.com
100	Guangzhou Evawanna Shoes And Clothes Co., Ltd. Seller Ali Id 2211815880714 Member Id evawanna	evawanna0801@126.com
102	Guangzhou Fiona Clothing Co., Ltd Seller Ali Id 2215817195507 Member Id feiouna	m18126727411@163.com
103	Guangzhou Forward E-Commerce Co., Ltd. Seller Ali Id 2215468376256 Member Id luckyjackie	13632270209@aliyun.com
105	Guangzhou Gaia Garments Co., Ltd Seller Ali Id 2215592517465 Member Id gzgaia	8728672@qq.com
106	Guangzhou Gaosheng Garment Co., Ltd Seller Ali Id 2213256183222 Member Id gzgsfz	mark@gaoshenggarment.com
107	Guangzhou Gui Tong Trading Co., Ltd. Seller Ali Id 2206450310403 Member Id trendytao	inform@trendytao.com
108	Guangzhou Guruisi Clothing Co., Ltd. Seller Ali Id 2213300820560 Member Id goodrace	guruisi@gzguruisi.com
109	Guangzhou Hongyun Clothing Co., Ltd Seller Ali Id 2209237065480 Member Id hongyunclothing	hongyunclothing@163.com
111	Guangzhou iDesign Technology Co., Ltd Seller Ali Id 2213620340670 Member Id gzidesign	aimee@gzidesign.com
112	Guangzhou I-Feeling Clothing Co., Ltd. Seller Ali Id 2211559733561 Member Id ifeeling	justin@i-feelingclothing.com
115	Guangzhou Jiayan Trading Service Co., Ltd. Seller Ali Id 2213017868563 Member Id luxstore	435667833@qq.com

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117	Guangzhou Joye Accessories Co., Ltd. Seller Ali Id 2214444280496 Member Id sgjiashun	liqiang_77@outlook.com
119	Guangzhou Junli Apparel Co., Ltd Seller Ali Id 2210544702350 Member Id zhuoligarment	zhuoligarment@163.com
120	Guangzhou Junli Import And Export Co., Ltd. Seller Ali Id 2216011608490 Member Id gzjunlee	1912264057@qq.com
121	Guangzhou Lang buwan clothing Co.Ltd Seller Ali Id 2210300797363 Member Id looyaclothing Seller Ali Id 2210239764672 Member Id no1clothing	manager4@no1langbuwan.com manager1@no1langbuwan.com
122	Guangzhou Langbuwan Clothing Co., Ltd. Seller Ali Id 2210311734038 Member Id loohoclothing	manager2@no1langbuwan.com
123	Guangzhou Lanyiqi Trading Co., Ltd. Seller Ali Id 2214563422884 Member Id wonbinlv	287611586@qq.com
126	Guangzhou Linda Garments Co., Ltd Seller Ali Id 2213973758772 Member Id lingdafashion	lindalee@lingdafashion.com
128	Guangzhou Lixing Electronic Technology Co., Ltd. Seller Ali Id 2207249565765 Member Id lth123	leving_01@163.com
130	Guangzhou Meisen Garment Co., Ltd. Seller Ali Id 2215785129290 Member Id cnmszy	441932930@qq.com
131	Guangzhou Mengxintong Trading Co., Ltd. Seller Ali Id 2211930366238 Member Id tiantian0401	xuechan2006@163.com
133	Guangzhou Minmin Industrial Holding Co., Ltd. Seller Ali Id 2210538901191 Member Id minminclothes	1158194851@qq.com
134	Guangzhou Muhaban Trading Co., Ltd. Seller Ali Id 2216029344508 Member Id jamila2023	2149242490@qq.com
135	Guangzhou New Apparel Trade Company Limited Seller Ali Id 4035313132 Member Id fscaps	fscaps@hatclothing.com
137	Guangzhou Outpace Sportswear Co., Ltd. Seller Ali Id 2208506935253 Member Id cyyd1998	damon@op-sportswear.com
139	Guangzhou Prettysteps Garment Co., Ltd. Seller Ali Id 17381341985 Member Id prettysteps	export@prettysteps.com.cn
140	Guangzhou Pzf Garment Co., Ltd. Seller Ali Id 3081096308 Member Id ocn1688	pzf18138766600@163.com
141	Guangzhou Qiaoyi Clothing Co., Ltd Seller Ali Id 2214842328304 Member Id qiaoyifashion	13531292283@qq.com
142	Guangzhou Quintai Garment Company Ltd. Seller Ali Id 2962190462 Member Id qiaoyifashion	yangsen@gzqintai.com

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146	Guangzhou Samwestart Technology Co., Ltd. Seller Ali Id 17298874503 Member Id ali900154899	admin@samwestart.com
147	Guangzhou Sehe Apparel Co., Ltd Seller Ali Id 2901838112 Member Id sehefashion	hope@sehefashion.com
150	Guangzhou Shiwai Foreign Trade Clothing Co., Ltd Seller Ali Id 2207613322596 Member Id wjsw	1921849816@qq.com
151	Guangzhou Starry Clothing Ltd Seller Ali Id 2213265282013 Member Id cnstarryclothing66	chris@starryclothing.com
152	Guangzhou Suwo Trading Co., Ltd. Seller Ali Id 2211930864701 Member Id gzfindoutyl	gm1097404934@gmail.com
153	Guangzhou Taoyan Trading Co., Ltd. Seller Ali Id 2213311566932 Member Id taoyantrading	cathy@aixitrading.com
154	Guangzhou Twoway Fashion Industry Co., Ltd. Seller Ali Id 2216224382346 Member Id gotwoway	gotwoway@163.com
155	Guangzhou Van Yit Garment Co., Ltd. Seller Ali Id 2215607147615 Member Id fanyite	1041781185@qq.com
156	Guangzhou Vegas Clothing Co., Ltd Seller Ali Id 3862268474 Member Id cn1522805245tsxp	amiytang@gzvegas.cn
159	Guangzhou Xinchu Trading Co., Ltd. Seller Ali Id 2215602760594 Member Id gzxc168	952108727@qq.com
161	Guangzhou Yifany Technology Co., Ltd. Seller Ali Id 2215415301129 Member Id yf04020925	yfangela@yifany.com
162	Guangzhou Yilisha Garment Co., Ltd. Seller Ali Id 2210213476201 Member Id elisafashion	sales01@gzelisa.com
163	Guangzhou Yingjiaqi Clothing Co.,Ltd Seller Ali Id 2215524987909 Member Id yjclothes	sales01@gzyjq.com
164	Guangzhou Yinshi Apprael Co., Ltd. Seller Ali Id 2207538022486 Member Id gzyinshi	1090273233@qq.com
165	Guangzhou Yixin Trading Co., Ltd. Seller Ali Id 2212982154859 Member Id royalyixin	1324187927@qq.com
166	Guangzhou Youqi Trading Co., Ltd Seller Ali Id 2207597548510 Member Id youqiclothing	youqiclothing@aliyun.com
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No.	Seller	Seller's Contact Information
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172	Guangzhou Zhuoya Clothing Firm Seller Ali Id 2213890035794 Member Id dgzhuoya	yl18565967304@163.com
173	Guangzhou Zichen Clothing Co., Ltd. Seller Ali Id 2212487387202 Member Id zichenoem	lovekookoo@qq.com
174	Guangzhou Ziqi International Trading Ltd Seller Ali Id 2213034191510 Member Id allure0912	iamtinaren@qq.com
175	Guangzhou Ziya Network Technology Co., Ltd. Seller Ali Id 2215426534593 Member Id ziyaapparel	ziyali@ziyaapparel.com.cn
176	Guigang Tengguan Clothing Co., Ltd. Seller Ali Id 2216041751235 Member Id ggtg	tengguanfs@163.com
179	Hangzhou Fashion Oxygen Trade Co., Limited Seller Ali Id 2206774303730 Member Id 809c	shinyshinydesign@163.com
180	Hangzhou Huanwei Trading Co., Ltd. Seller Ali Id 2830910313 Member Id hzhuanwei	mary@hzhuanwei.com
181	Hangzhou Jiuxing Clothing Co., Ltd. Seller Ali Id 2207340190305 Member Id hzjxx	merittexu@126.com
182	Hangzhou Manbu Clothing Co., Ltd Seller Ali Id 2215225230108 Member Id grizzilla	t514559937@163.com
183	Hangzhou Yongyuan Technology Co., Ltd Seller Ali Id 2212551697066 Member Id maxyao	max15356148382@163.com
185	Hebei Ji Mi Clothing Co., Ltd. Seller Ali Id 2206376442099 Member Id hbjimi	molly@bu-chuan.com
186	Hebei Kang Sheng Yuan Sports Goods Co., Ltd Seller Ali Id 2928929708 Member Id jzksy	ksy@jzksy.com
188	Hefei Yaohai Zeyo Garment&accessory Firm Seller Ali Id 1833474911 Member Id zyxp123	772984387@qq.com
189	Henan Huanwei E-Business Co., Ltd. Seller Ali Id 3972370668 Member Id vsry	amy@vsry.net
190	Henan Songkun Import And Export Ltd Seller Ali Id 2216048157668 Member Id hnsongkun	henansongkun2020@163.com
191	Henan Songzhi Import And Export Co., Ltd. Seller Ali Id 2215203825703 Member Id henansongzhi	henansongzhi@163.com

No.	Seller	Seller's Contact Information
192	Henan Xiaokangning Import And Export Co., Ltd. Seller Ali Id 2216799425131 Member Id hnxkn	henanxiaokangning@163.com
193	Huizhou Qian Qian Industrial Co., Ltd. Seller Ali Id 1095227776414 Member Id cnqqtrading	qqtrading@189.cn
195	Hunan Chuanglan Supply Chain Management Co., Ltd. Seller Ali Id Hunan Chuanglan Supply Member Id chuanglan1	eunice@fashiondisc.com
196	Hunan Saiqun Network Co., Ltd. Seller Ali Id 2215595126219 Member Id hnsaiqun	hunansaiqun1@aliyun.com
199	Jianghua May F.m. Garment Co., Ltd. Seller Ali Id 2201709697318 Member Id wholesale6	daisy@cheerindustry.com
200	Jiangxi Zhaoye International Trade Co., Ltd. Seller Ali Id 2215608523885 Member Id zhaoyecorp	zhaoyegroup@163.com
201	Jiangxi Zhilin Imp&Exp Co., Ltd. Seller Ali Id 3970928914 Member Id jxzhilin	silviaxiong@jxzhilin.com
202	Jiangyin GET Garments Co., Ltd. Seller Ali Id 2213071205669 Member Idjygetfashion	826051777@qq.com
204	Jiaxing Coolsun Garment Co., Ltd. Seller Ali Id 3973612597 Member Id zjcoolsun	zjcoolsun@aliyun.com
206	Jinhua Taijun Household Products Co., Ltd. Seller Ali Id 2200728310292 Member Id tjbikini	sales@tjbikini.com
207	Jinhua Younamei Trading Co., Ltd. Seller Ali Id 2213320273094 Member Id younamei	229257554@qq.com
208	Jinjiang Liuming Trading Co., Ltd. Seller Ali Id 2206491440574 Member Idliumingjewelry Seller Ali Id 2206542304757 Member Id liuming666	liumingkallen2@163.com liumingkallen@163.com
211	KIMSHEIN LIMITED. Seller Ali Id 2211253405695 Member Id kimshein	julia@jsytrade.com
212	Lanzhou Limanying Trading Co., Ltd. Seller Ali Id 2212481538751 Member Id cnmuslim	limanying01@126.com
213	Lianze (guangzhou) Foreign Trade Clothing Co. Ltd. Seller Ali Id 2216103503675 Member Id wjwmlz	161448189@qq.com
214	Liaoning Yituo Garment Co., Ltd Seller Ali Id 2212651619256 Member Id seacup	li618892021@163.com
215	Licheng District Wangyao Trade Firm Seller Ali Id 2210068586525 Member Id bachenwy	bachendianzi@126.com
219	Maqvob Apparel Group Ltd. Seller Ali Id 2214458867261 Member Id cnmindi	davidshao1912@foxmail.com
220	MGOO GARMENT MANUFACTURING COMPANY LIMITED	mgoofashion@gmail.com

No.	Seller	Seller's Contact Information
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221	Nanchang Zhongdianhong Trading Co., Ltd. Seller Ali Id 2215469416322 Member Id ncszdhsm	2364817083@qq.com
222	Nantong Loyalty Import And Export Co., Ltd Seller Ali Id 2216651414499 Member Id ntloyalty	loyalty0927@163.com
223	Nanyang Ruitao Trading Co., Ltd. Seller Ali Id 2215532535113 Member Id nyruitao	421738825@qq.com
225	NINGBO C.CLOTHING IMPORT & EXPORT CO., LTD. Seller Ali Id 2216950412005 Member Id cclothing	inno@ccllothing.cn
226	Ningbo Xingqi Import And Export Co., Ltd. Seller Ali Id 2215645817607 Member Id cnxingqi	jinny@nbxingqi.com
227	No.8 Shop (beijing) International Trade Co., Ltd. Seller Ali Id 2216300875206 Member Id zgbrothers	sales@zgbrothers.com
228	Number One Industrial Co., Ltd. Seller Ali Id 3446791951 Member Id noonwholesales	claire@ibmcgroup.net
229	One Dollar International Import & Export ( Guangzhou) Co., Ltd. Seller Ali Id 2210956652410 Member Id gzonedollar1	tangyi@gz-mingtai.com
230	Pingdingshan Sunn Technology Co., Ltd. Seller Ali Id 2212930075123 Member Id pdssekj	<a href="mailto:pdssekj@163.com">pdssekj@163.com</a>
231	Qingdao Baohuiyang International Trade Co., Ltd. Seller Ali Id 2209956478129 Member Id baohuiyang	beixing_88@126.com
234	Quanzhou Fangcheng Trading Co., Ltd, Seller Ali Id 2215562327717 Member Id qzfmzy	<a href="mailto:my448766411@qq.com">my448766411@qq.com</a>
235	Quanzhou Fotron Trading Co., Ltd. Seller Ali Id 2206497168520 Member Id polywellgroup	bruce@polywell-inc.com
236	Quanzhou Global Lover Garments Co., Ltd. Seller Ali Id 2621356479 Member Id globallover	120298206@qq.com
237	Quanzhou Huasong Information Technology Co., Ltd Seller Ali Id 2216761068769 Member Id huasong2023	huasong666@qq.com
239	Quanzhou Jinglimei Trading Co., Ltd. Seller Ali Id 2210566838600 Member Id jinglimeitrade	jinglimeitrade@foxmail.com
243	Quanzhou Mengmao Trading Co., Ltd. Seller Ali Id 2200732097063 Member Id romanticlegend	3254575667@qq.com

No.	Seller	Seller's Contact Information
244	Quanzhou Minshan Import & Export Trading Co. Seller Ali Id 2214082789932 Member Id mengmao Seller Ali Id 2212018811158 Member Id minthson Seller Ali Id 2208245521885 Member Id ecowalson	2164362193@qq.com coldker2021@yeah.net coldker2021@yeah.net
246	Quanzhou Minzhen Clothing Co., Ltd. Seller Ali Id 2211613462951 Member Id minzhenfushi	minzhenfushi@aliyun.com
247	Quanzhou No Resistance Trading Co., Ltd. Seller Ali Id 2214168133588 Member Id qzwzl	wuzuli688@163.com
248	Quanzhou Onen Ecommerce Co., Ltd Seller Ali Id 2765926745 Member Id bestclothes	onenclothes@sina.com
249	Quanzhou Qingsong Trading Co., Ltd. Seller Ali Id 2215106661608 Member Id kingqingsong	mystylesh@qq.com
251	Quanzhou Shanshan Trading Co., Ltd Seller Ali Id 3502242274 Member Id cn1526724928qhev	3424414038@qq.com
252	Quanzhou Stamgon Trading Co., Ltd. Seller Ali Id 3064859204 Member Id stamgon	sales1@stamgon.com
253	Quanzhou Sunwear Enterprise Co., Ltd. Seller Ali Id 3853122285 Member Id qzswimsuits	sunwear_ali@sunwear.com. cn
254	Quanzhou Tianyi Clothing Co., Ltd Seller Ali Id 17379939603 Member Id qztianyi	annie@lover-baby.com
255	Quanzhou Walson Imp & Exp Co., Ltd Seller Ali Id 2143963066 Member Id instyles	instylesbestdress@163.com
256	Quanzhou Wensidi Trading Co., Ltd Seller Ali Id 2215600988559 Member Id wensidi	534375563@qq.com
257	Quanzhou Xuyou Technology Co., Ltd Seller Ali Id 2211035246005 Member Id qzxuyou	qzxuyou@163.com
258	Quanzhou Yetai Trading Co., Ltd. Seller Ali Id 2216192691344 Member Id qzyetai	1028846370@qq.com
259	Quanzhou Yibiao Sexy Lingerie Co., Ltd. Seller Ali Id 17380179560 Member Id cnqzyibiao	xiaomei1890@aliyun.com
260	Quanzhou Yingyi Trade Company Limited Seller Ali Id 2213307033062 Member Id cnyingyi	cnyingyi@163.com
261	Quanzhou Zhukuanghong Garments Co., Ltd Seller Ali Id 2215091082571 Member Id zhukuanghong	403145666@qq.com
262	Quanzhou Zichen Clothing Co., Ltd. Seller Ali Id 2212005518554 Member Id ziyunchen	c98581816@163.com

No.	Seller	Seller's Contact Information
263	Shaanxi Huiyi Core Goods Industry Co., Ltd. Seller Ali Id 2215410656544 Member Id hyxhsy	213123@qq.com
265	Shanghai Powertec Industry Co., Ltd. Seller Ali Id 3248670150 Member Id shbkgm	lucyyu@poresmax.com
267	Shanghai Rejie Industrial Co., Ltd. Seller Ali Id 2212983336868 Member Id shrejie	shangxuquan@icloud.com
269	Shanghai Yixixi Industry Co., Ltd. Seller Ali Id 2214740744609 Member Id easysy	catherine@shyixixi.com
270	Shanghai Youti Clothing Co., Ltd. Seller Ali Id 2206941338351 Member Id ipcompany	hanna@ipc-c.com
271	Shanghai Yubin Trading Co., Ltd. Seller Ali Id 2213131548442 Member Id shyubin	business@shanghaiyubin.com
272	Shangrao Oufeishan Technology Co., Ltd. Seller Ali Id 2214264357759 Member Id srofs2	p17157939999@163.com
274	Shantou Chaoyang District Guiyu Pengxing Knitting Factory Seller Ali Id 2206755223678 Member Id pengxing888	stpengxing@126.com
276	Shantou Hongli Clothing Co., Ltd. Seller Ali Id 2207705955470 Member Id hongliclothing	veronica_hongli@126.com
277	Shantou Linsee Knitwear Co., Ltd. Seller Ali Id 2214974573889 Member Id linseeknitwear	linsee2@bepartner.cn
278	Shanxi Ashley Bio-Tech Co., Ltd. Seller Ali Id 2215271875981 Member Id cn17696240423	ashley3240@163.com
280	Shanxi Titan Biotechnology Co., Ltd. Seller Ali Id 2216091573154 Member Id sxtitan	455890185@qq.com
282	Sheng Zhou Huijia Garment Co., Ltd. Seller Ali Id 2206644037421 Member Id sosohuijia	cnhuijia@163.com
283	Shenglong Swimming (huludao) Garment Trading Co., Ltd. Seller Ali Id 2215699063884 Member Id slyyhld	shenglong@slswimwear.com
285	Shenyang Willian Network Technology Co., Ltd. Seller Ali Id 2209135011511 Member Id sywlwl	434806372@qq.com
287	Shenzhen Changyuan Electronic Commerce Co., Ltd. Seller Ali Id 2211339722891 Member Id wyjean	214499369@qq.com
289	Shenzhen Fendi Jewelry Co., Ltd. Seller Ali Id 2206775576597 Member Id fendijewelry	fendijewelry@163.com
290	Shenzhen Hongxia Technology Co., Ltd. Seller Ali Id 2212501981333 Member Id szhongxia	sale@szhongxiaclothing.com

No.	Seller	Seller's Contact Information
291	Shenzhen Innoview Technology Co., Ltd. Seller Ali Id 2209944124714 Member Id innoviewtech	xuleping@innoviewtech.com
292	Shenzhen Jie Shi Ni Industrial Co., Ltd Seller Ali Id 3218291883 Member Id cn1520360352dxkc	michelle@jsnswimwear.com
294	Shenzhen Longgang District Qixuan Baby Underwear Factory (individual Business) Seller Ali Id 2201226483335 Member Id qixuanbaby	qixuanbaby168@163.com
296	Shenzhen Messa Garments Co., Ltd. Seller Ali Id 2201727537823 Member Id mingxiclothing	lulu@maxfashion.cn
297	Shenzhen Miumiu Jewelry Co., Ltd. Seller Ali Id 2213226172658 Member Id miumiujewelry	miumiujewelry@163.com
298	Shenzhen Momeishi Clothing Co., Ltd. Seller Ali Id 2211908416327 Member Id momeishi	lilyhongmomes@hotmai.com
299	Shenzhen Msg Technology Co., Ltd. Seller Ali Id 2207911809765 Member Id msgtech	18566689637@qq.com
300	Shenzhen New Greatwall Technology Co., Ltd. Seller Ali Id 17380967280 Member Id sznewgreatwall	bestbusiness@foxmail.com
302	Shenzhen Pinchen Technology Co., Ltd. Seller Ali Id 2208300708394 Member Id pinchen0512	pinchen0512@163.com
303	Shenzhen Qiu Tai International Media Co., Ltd. Seller Ali Id 2216055876696 Member Id qiutai	2922264353@qq.com
304	Shenzhen Siweiming Garment Trading Co., Ltd. Seller Ali Id 2210877114761 Member Id leva0215	carriesale@126.com
305	Shenzhen Tengwei Clothing Co., Ltd Seller Ali Id 2208314404258 Member Id tengweng	sales1@360tengweng.com
306	Shenzhen Wallis E-Commerce Co., Ltd. Seller Ali Id 2214095135906 Member Id wallis0429	wallis0429@163.com
307	Shenzhen Yannisfashion Commerce Co., Ltd Seller Ali Id 3026892066 Member Id yannisfashion	yannisfashion@163.com
309	Shenzhen ZFK Trade Co., Ltd. Seller Ali Id 2209796007215 Member Id zfksm	wuyuefeng0104@163.com
310	Shishi Baishiwei Garment Trading Co., Ltd. Seller Ali Id 2209001706817 Member Id bestwaycn	773103980@qq.com
311	Shishi Shiaiyng Garment Co., Ltd Seller Ali Id 2211529790763 Member Id anszktm	1609432269@qq.com

No.	Seller	Seller's Contact Information
313	Sichuan Ronghui Jiuzhou Trading Co., Ltd. Seller Ali Id 2213012875476 Member Id clothingglobal	clothingglobal@aliyun.com
314	Suizhou Huaxi Trade Co., Ltd. Seller Ali Id 2211444943261 Member Id huaximaoyi	dduhomelighting@gmail.com
316	Tg Cup Industry Technology (hangzhou) Co., Ltd. Seller Ali Id 2210277452460 Member Id hztaigebeiye	z15268530980@163.com
318	Weihai Grand Legend Garment Co., Ltd. Seller Ali Id 2212587124479 Member Id whyichun	55348657@QQ.com
320	Xiamen Aicai Apparel Co., Ltd. Seller Ali Id 1095227622751 Member Id aicaiapparel	anna-aicaiapparel@hotmail.com
322	Xiamen Aiyiyang Trading Co., Ltd. Seller Ali Id 2214467542742 Member Id ayyxm	335875707@qq.com
323	Xiamen Bristter Sports Products Co., Ltd. Seller Ali Id 2208732391064 Member Id bristter	jack@xmbristter.com
324	Xiamen Cenxing Import And Export Co., Ltd. Seller Ali Id 17380439278 Member Id fashioneyewear	monica@xmccenxing.com
326	Xiamen Chuangyijia Trading Co., Ltd. Seller Ali Id 2211018660967 Member Id cnchuangyijia	1328750765@qq.com
328	Xiamen Fengway Imp. & Exp. Co., Ltd. Seller Ali Id 3423474915 Member Id xmfengway	tracy@xmfengway.com
329	Xiamen Gifter Import And Export Co., Ltd. Seller Ali Id 2216016389321 Member Id gifter02	577045323@qq.com
330	Xiamen Golden Bays Industrial Co., Limited Seller Ali Id 2211840982611 Member Id xmjzh	jzh15859576021@163.com
331	Xiamen Honore Supply Chain Management Co., Ltd. Seller Ali Id 2211193327447 Member Id 11honore	864505565@qq.com
332	Xiamen Jianyi Xinhong Trading Co., Ltd. Seller Ali Id 2209115171265 Member Id jyxh123	xmjyxhmy@163.com
333	Xiamen Jiyuxiang Garment Co., Ltd. Seller Ali Id 2209906924486 Member Id jiyuxiang	ljwu@pop-gloria.com
334	Xiamen Little Yumi Trade Co., Ltd. Seller Ali Id 2212882607818 Member Id littleyumi	342681532@qq.com
335	Xiamen M S G Garment Co., Ltd. Seller Ali Id 2215541014289 Member Id xmmsg	fitnessgarment23@hotmail.com
336	Xiamen Meibile Import And Export Co., Ltd. Seller Ali Id 2212394780937 Member Id homedeko	fsf218@126.com
337	Xiamen Moen Global Trading Co., Ltd. Seller Ali Id 3933459010 Member Id moendress	sindy@queenmoen.com

No.	Seller	Seller's Contact Information
338	Xiamen Moglovers Technology Co., Ltd. Seller Ali Id 2772234554 Member Id dearonline	tina@dear-online.com
339	Xiamen New Trend Trading Co., Ltd. Seller Ali Id 2212173602706 Member Id xmnewtrend	candy@newtrendxm.com
340	Xiamen Ningning Qi E-Commerce Co., Ltd. Seller Ali Id 2210671116745 Member Id trendyqueen	494921203@qq.com
342	Xiamen Pop Gloria International Trade Co., Ltd Seller Ali Id 2209813614863 Member Id xmpopgloria	aling.shang@pop-gloria.com
343	Xiamen Qinchang Apparel Co., Ltd. Seller Ali Id 2212443864672 Member Id woohoo666	qinchang666888@gmail.com
344	Xiamen Simian E-Business Co., Ltd. Seller Ali Id 2207263006037 Member Id lovelydress	hjl1989103@126.com
345	Xiamen Sipaisi Trading Co., Ltd Seller Ali Id 2206696618314 Member Id fjspace	925304181@qq.com
346	Xiamen Sky Pigeon Network Technology Co., Ltd. Seller Ali Id 2211526752563 Member Id daywork	tiangeb2b2022@163.com
348	Xiamen Starlights Supply Chain Co., Ltd. Seller Ali Id 2212322829534 Member Id starlightsltd Seller Ali Id 2211931776541 Member Id starlightsco	starlightsltd@outlook.com starlights@starlightsco.com
350	Xiamen Tongsiyuan Trading Co., Ltd. Seller Ali Id 3190971340 Member Id cn1520239894ffby	785828767@qq.com
351	Xiamen Unique Pretty Textile Clothing Co.,Ltd Seller Ali Id 2208579719880 Member Id youtaimei	risa@uniqueprettyclothing.com
352	Xiamen Weimiduo Industrial Co., Ltd. Seller Ali Id 2214687076851 Member Id weimiduo	davisefu@doteypoppsy.com
353	Xiamen Xinyi Import And Export Co., Ltd. Seller Ali Id 2200593916217 Member Id xinyiapparel	rita@xinyi-apparel.com
354	Xiamen Yangfan Trading Co., Ltd Seller Ali Id 2207940646469 Member Id seeyf	2608737271@qq.com
355	Xiamen Yingleihong Electronic Commerce Co., Ltd. Seller Ali Id 2211847070144 Member Id xmleihong	leihong6528@163.com
356	Xingcheng Besali Sporting Goods Co., Ltd. Seller Ali Id 2216094260462 Member Id beisali	beisali2024@163.com
357	Xinxiang Jues Department Store Co., Ltd Seller Ali Id 2216767807608 Member Id xxjs88	xxjues@outlook.com
358	Xingcheng Dongshengda Garment Co., Ltd. Seller Ali Id 2212997787605 Member Id zuoheswimwear	917922716@QQ.COM

No.	Seller	Seller's Contact Information
359	Xinxiang Shiyuan Trading Co., Ltd. Seller Ali Id 2212402129976 Member Id xxsystem	amyguo@shiyuanshangmao.com
360	Xinxing County Adana Clothing Co., Ltd Seller Ali Id 2216303922219 Member Id cn1564713676panm	13662992125@163.com
361	Yamon (hangzhou) International Trade Co., Ltd Seller Ali Id 2215872833338 Member Id cnzweng	yamonbusiness@163.com
362	Yiwu Beiwo Trading Co., Ltd. Seller Ali Id 2200779387617 Member Id backwash	391697651@qq.com
363	Yiwu Changjie Trading Co., Ltd. Seller Ali Id 3974296537 Member Id changjie88	18621943372@163.com
364	Yiwu Chenxia E-Commerce Firm Seller Ali Id 2212317234783 Member Id btjewelry	baotuo2022@163.com
365	Yiwu Chenyan Jewelry Co., Ltd Seller Ali Id 2206929075518 Member Id cenyumjewelry	chenyanjewelry@gmail.com
367	Yiwu City Chenhao Trading Co., Ltd. Seller Ali Id 2209037470425 Member Id zjywch	xuelong1997@qq.com
368	Yiwu City Domy Garment Co., Ltd. Seller Ali Id 2207667935516 Member Id domy2020	domy001@domygarment.com
369	Yiwu Dajie Import And Export Co., Ltd. Seller Ali Id 2206887864844 Member Id dajie88	a13636458361@163.com
370	Yiwu Dingxin E-Commerce Co.,Ltd. Seller Ali Id 2209090238626 Member Id dingxin1	sofia@kaiding1.com
371	Yiwu Duoniu Import And Export Co., Ltd Seller Ali Id 2213867887927 Member Id cnduoniu2022	duoniu2022@aliyun.com
373	Yiwu Fengyao Garment Co., Ltd. Seller Ali Id 2202442347462 Member Id ywfengyao	yiwufengyao@126.com
377	Yiwu Huiyu E-Commerce Firm Seller Ali Id 2214752576982 Member Id onedistribution	qinzhang@huiyu123.com
378	Yiwu Kaiding Electronic Commerce Co., Ltd. Seller Ali Id 3252961031 Member Id kaiding1	amos@kaiding1.com
379	Yiwu Kejia Import And Export Co., Ltd. Seller Ali Id 3855388557 Member Idkejiacompany	mark@ywkejiacompany.com
380	Yiwu Lizhiyi Apparel Co., Ltd. Seller Ali Id 2207478761168 Member Id cnlizhiyi	1655309122@qq.com
383	Yiwu Maining Trading Co., Ltd. Seller Ali Id 2206935940787 Member Id mainingtrade	mainingtrade@aliyun.com

No.	Seller	Seller's Contact Information
385	Yiwu Mingqi Trading Co., Ltd. Seller Ali Id 2216044431278 Member Id mingqitrade	569163243@qq.com
387	Yiwu Motty Garment Co., Ltd. Seller Ali Id 3475945833 Member Id mottyzhang	15267949307@163.com
388	Yiwu Mozi Trade Company Limited Seller Ali Id 2211135522110 Member Id mozitrade	mozitrade@163.com
389	Yiwu Nuoyi Imp & Exp Co., Ltd Seller Ali Id 2200739518350 Member Id nuoyiapparel	jesse@cnoceansky.com
390	Yiwu Om Import And Export Co., Ltd. Seller Ali Id 4229765300 Member Id cnouming88	admin@saiki.top
391	Yiwu Orange Sui Import And Export Company Limited Seller Ali Id 2215270892140 Member Id orangesui	orangesui@outlook.com
393	Yiwu Pengrun Apparel Co., Ltd Seller Ali Id 2211604592499 Member Id ywpengrun	happygu@cnpoom.com
394	Yiwu Qiji Trading Co., Ltd Seller Ali Id 3916051240 Member Id qijitrading	qijitrading@aliyun.com
396	Yiwu S&y Trading Co., Ltd. Seller Ali Id 2206598342837 Member Id sallyxieshmily	sally_xie@sytradingshmily.com
397	Yiwu Saichen Import And Export Co., Ltd. Seller Ali Id 3875251428 Member Id saichen	248508251@qq.com
398	Yiwu Sangor Import And Export Co., Ltd. Seller Ali Id 1939223129 Member Id sangor	admin@sangorcaps.com
399	Yiwu Sangtu Import And Export Co., Ltd. Seller Ali Id 2209329454036 Member Id langheng99	langheng99@163.com
401	Yiwu Tixu E-Business Firm Seller Ali Id 2211489188430 Member Id tiyodesigner	865733883@qq.com
402	Yiwu Wenshuo Import And Export Co., Ltd Seller Ali Id 17380927018 Member Id wenshuofashion	stevenliang@wenshuo.net.cn
403	Yiwu Xiangjia Clothing Co., Ltd. Seller Ali Id 2215853920139 Member Id ywxiangjia	mina@xjxiangjia.com
404	Yiwu Xiaokan Electronic Commerce Firm Seller Ali Id 2210371740878 Member Id alxiaokan	alxiaokan@163.com
406	Yiwu Xinxin Import And Export Co., Ltd. Seller Ali Id 2211436169271 Member Id xinxinjewelry	xinxinnecklace@163.com
407	Yiwu Xinyu Garment Co., Ltd Seller Ali Id 2212409639314 Member Id ywxinyugarment	xinyugarment@qq.com

No.	Seller	Seller's Contact Information
408	Yiwu Xuanxin Trading Co., Ltd. Seller Ali Id 2208140663917 Member Id anneyam	ymmyann@163.com
410	Yiwu Yayan Trading Co., Ltd. Seller Ali Id 2213852759750 Member Id yayanfrandy	frandyfu@yayantrade.com
411	Yiwu Yili Trading Firm Seller Ali Id 2215695134648 Member Id gzyilil	mefashion42@163.com
412	Yiwu Yinglei Trading Co., Ltd. Seller Ali Id 2211622037162 Member Id ylcompany	353534946@qq.com
413	Yiwu Yinpeng Healthy&Sport Article Co., Ltd. Seller Ali Id 3074768858 Member Id chinayinpeng	2429691753@qq.com
415	Yiwu Youlike Electronic Commerce Co., Ltd. Seller Ali Id 2209584376196 Member Id hhb570673214	bobofengzhijian@qq.com
416	Yuanhong Garment Accessory Co., Ltd. Seller Ali Id 17179896634 Member Id cnyuanhong	longlailtd@163.com
417	Yuanyang County Hengsen Department Store Co., Ltd. Seller Ali Id 2208453073440 Member Id yyhsbh	yuanyanghengsen@163.com
419	Zhangzhou Daimeng Clothing Co., Ltd. Seller Ali Id 2212771469326 Member Id damochic	rose@damochic.com
421	Zhejiang Bsofter Textile Co., Ltd Seller Ali Id 2212541981855 Member Id zjshuran	service@bsofter.com
422	Zhejiang G Top Clothing Co., Ltd. Seller Ali Id 2210878167080 Member Id gtopclothing	ritawu@gtopclothing.com
423	Zhengzhou Senyo Trading Co., Ltd. Seller Ali Id 2212400503128 Member Id zzsenyo	senyo0715yuan@163.com

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

**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-01807-VMK-GAF**

**Honorable Virginia M. Kendall  
Magistrate Gabriel A. Fuentes**

Hearing Date: November 26, 2024

Hearing Time: 9:30 AM CT

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 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 June 25, 2024, the Court granted Plaintiff’s Motion for Entry of Clerk’s Default against the Defaulted Defendants. [Dkt. No. 64.] Pursuant to Rule 55(b)(2), Plaintiff now respectfully moves this Court for entry of a default judgment finding two hundred ninety-six (296) of 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 thirty-three (33) federally registered copyrights asserted in this action:

- |                   |                                     |                   |                   |
|-------------------|-------------------------------------|-------------------|-------------------|
| (1) VA0002369378  | (2) VA0002381204                    | (3) VA0002381206  | 4) VA0002381125   |
| (5) VA0002381126  | (6) VA0002381127                    | (7) VA0002381142  | (8) VA0002381156  |
| (9) VA0002381160  | (10) VA0002381161                   | (11) VA0002381162 | (12) VA0002381097 |
| (13) VA0002381101 | (14) VA0002381109                   | (15) VA0002381110 | (16) VA0002381111 |
| (17) VA0002381115 | (18) VA0002381116                   | (19) VA0002381117 | (20) VA0002379888 |
| (21) VA0002379893 | (22) VA0002379895                   | (23) VA0002379894 | (24) VA0002379907 |
| (25) VA0002379904 | (26) VA0002379881                   | (27) VA0002379911 | (28) VA0002380492 |
| (29) VA0002380491 | (30) VA0002379930                   | (31) VA0002379897 | (32) VA0002379895 |
| (33) VA0002379934 | (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 Alibaba.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 June 25, 2024, the Court granted Plaintiff’s Motion for Entry of Clerk’s Default. [Dkt. No. 64.] 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 June 25, 2024, the Court granted Plaintiff's Motion for Entry of Clerk's Default against the Defaulted Defendants. [Dkt. No. 64.] 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. 62], 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. No. 1 at 15-34.] 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. 63.] 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 another online 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. 64.] 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 two hundred ninety-six (296) Defaulted Defendants in this action should be found liable for \$15,000 each because of their willful infringement for each of the thirty-three (33) Registered Copyrights in this action independent infringements of the 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. 63.] 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. 64.] 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 through 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: November 21, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 13th day of November 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. 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, Alibaba.

No.	Seller	Seller's Contact Information
1	Guangzhou Baiyun District Ka Ya Te Garment Factory Seller Ali Id 2318142448 Member Id hdchris	bzpswo@my.com
2	Alibaba (zhongguo)wangluojishuyouxiangongsi Seller Ali Id 2217241433921 Member Id tr1566403965xika	202401190001@ggo.net
5	Beijing Boningsai Trading Co., Ltd. Seller Ali Id 2214575013601 Member Id bjbns	admin@boningsai.com
6	Changsha Ox Arts & Crafts Co., Ltd. Seller Ali Id 2210557687578 Member Id doomedhappy	happy@doomedhappy.com
7	Changsha Zhezhe Clothing Co., Ltd. Seller Ali Id 2212382857597 Member Id cszhezhe	changshazhezhe@163.com
9	Changzhou Swimshark Garments Co., Ltd. Seller Ali Id 2215875044329 Member Id swimsk	panli@swimsk.com
11	Chongqing Gooney Information Technology Co.,ltd. Seller Ali Id 2212465769559 Member Id gooney	ganray01@163.com
12	Chongqing Xuesheng Clothing Ltd., Company Seller Ali Id 2214069948280 Member Id cqxsfsz	<u>2083858534@qq.com</u>
13	Dadao Gonghe (Shenzhen) Garment Co., Ltd. Seller Ali Id 2213257986992 Member Id ddghfz	944291982@qq.com
14	Dalian Tianzige Dress Design Co., Ltd. Seller Ali Id 2212658274015 Member Id dltzg	elva@tzgkids.com
16	Dongguan Boxiang Garment Co., Ltd. Seller Ali Id 3567299678 Member Id boxiang9999	boxiang@boxiang9999.com
18	Dongguan Chengwang Trading Co., Ltd. Seller Ali Id 2213327338183 Member Id dgchengwang	331822500@qq.com
19	Dongguan Chuangdian Garment Co., Ltd.	13922518923@139.com

No.	Seller	Seller's Contact Information
	Seller Ali Id 2215060147230 Member Id cd13903013480	
21	Dongguan City Jingyu Apparel Co., Ltd. Seller Ali Id 2212268638888 Member Id jingyuapparel	info@jingyuapparel.com
22	Dongguan Dafeng Garment Co., Ltd. Seller Ali Id 2213948562126 Member Id neixiu	a18681184599@163.com
23	Dongguan Dalang Muzhifeng Trade Department Seller Ali Id 2216424582546 Member Id mzf	2390635998@qq.com
26	Dongguan Fnjia Knitwear Co., Ltd. Seller Ali Id 2208410919462 Member Id dgfunnysports	irene@dgunnysports.com
27	DONGGUAN FUXING KNITTING GARMENTS CO.,LTD Seller Ali Id 2215223048315 Member Id dgfxknitting	dickenzou@foxmail.com
28	Dongguan Gina Import & Export Co., Ltd Seller Ali Id 3243578752 Member Id chinagina	sales09@fashionregina.com
29	Dongguan Ginwen Garment Co., Ltd Seller Ali Id 17381384181 Member Id cn1001005626	annaye1@hotmail.com
38	Dongguan Jinghong Foreign Trade Clothing Co., Ltd. Seller Ali Id 2208757504323 Member Id jh13071306429	2706626416@qq.com
40	Dongguan Kaqi Garment Co., Ltd. Seller Ali Id 2208456705434 Member Id kaachii	billy@kaachiiapparel.com
42	Dongguan Liziyang Clothing Co., Ltd. Seller Ali Id 2213243414083 Member Id lilian2018	jackson@lilianfashion.cn
43	Dongguan Manni Dress Co., Ltd. Seller Ali Id 17380611704 Member Id dgmanni	sunny@dgmanni.com
44	Dongguan Meiya Apparel Co., Ltd. Seller Ali Id 2215399707289 Member Id dongguanmeiya	admin@meiyapparel.com
45	Dongguan Miao Sheng Clothing Co., Ltd. Seller Ali Id 2214395586878 Member Id dgmiao sheng	xiaomin@miao shengapparel.com
46	Dongguan Mingge Knitting Garment Co., Ltd. Seller Ali Id 2211090413966 Member Id zgmg	mg13652688665@163.com
47	Dongguan Qian Yong Clothing Co., Ltd. Seller Ali Id 2216898085668 Member Id dgsqyfs	724560255@qq.com
48	Dongguan Qianxi Technology Co., Ltd. Seller Ali Id 2214568598962 Member Id aqianxi	admin@aqianxi.vip
49	Dongguan Qishun Clothing Co., Ltd. Seller Ali Id 2212388689453 Member Id shenyanci	yanci15999802190@163.com
50	Dongguan Ruichi Fashion Co., Ltd. Seller Ali Id 2215035387795 Member Id ruichifashion	sales@ruichifashion.com
51	Dongguan Sanniu Clothing Co., Ltd	2991881397@qq.com

No.	Seller	Seller's Contact Information
	Seller Ali Id 2215743137707 Member Id wangsi520	
53	Dongguan Shengde Clothing Co., Ltd. Seller Ali Id 2211817438199 Member Id shengde525	<a href="mailto:yigao@yigaocn.cn">yigao@yigaocn.cn</a>
54	Dongguan Shenjie Clothing Co., Ltd Seller Ali Id 2210011994102 Member Id shenjiefushi	<a href="mailto:o13877544009@163.com">o13877544009@163.com</a>
55	Dongguan Shinny Import & Export Ltd. Seller Ali Id 3594997623 Member Id shinnyfashion	<a href="mailto:2803111366@qq.com">2803111366@qq.com</a>
56	Dongguan Sky & Star Fashion Co., Ltd. Seller Ali Id 2175593641 Member Id skyandstar	<a href="mailto:cissyzen@skystarfashion.com">cissyzen@skystarfashion.com</a>
57	Dongguan Sun Denean Clothing Co., Ltd. Seller Ali Id 2211209465658 Member Id sundenean	<a href="mailto:star@seeusoongroup.com">star@seeusoongroup.com</a>
58	Dongguan VF Garment Co., Ltd. Seller Ali Id 3251836537 Member Id dgweifan	<a href="mailto:info@vfgarment.com">info@vfgarment.com</a>
59	Dongguan Xibolin Garment Co., Ltd Seller Ali Id 2213859086223 Member Id dgxibolin	<a href="mailto:hipony@yeah.net">hipony@yeah.net</a>
60	Dongguan Xiyi Clothing Co., Ltd. Seller Ali Id 2215196732170 Member Id xiyifs	<a href="mailto:ol32qwelur@luea.adso">ol32qwelur@luea.adso</a>
61	Dongguan Yalen Clothing Co., Ltd. Seller Ali Id 2051263593 Member Id dgyalen	<a href="mailto:ginahuang@yalenfashion.com">ginahuang@yalenfashion.com</a>
66	Dongguan YiYang Clothing Co., Ltd Seller Ali Id 2214233222935 Member Id yiyang6688	<a href="mailto:46163002@qq.com">46163002@qq.com</a>
68	Dongguan Yunya Fashion Co., Ltd. Seller Ali Id 3027741321 Member Id yunyafashion	<a href="mailto:jimmy@yunyafashion.com">jimmy@yunyafashion.com</a>
69	Dongguan Zhongyi Clothing Co., Ltd. Seller Ali Id 2207771777539 Member Id cnzhongyifashion	<a href="mailto:lili@yilifashion.com">lili@yilifashion.com</a>
71	Foshan Faoumei Garment Co., Ltd Seller Ali Id 2215261348923 Member Id bellefille168	<a href="mailto:15899822128@163.com">15899822128@163.com</a>
73	Fujian Century Yeung Pok Import And Export Co., Ltd. Seller Ali Id 2211576783717 Member Id yeungpok	<a href="mailto:zhengbeijing1980@163.com">zhengbeijing1980@163.com</a>
74	Fujian Rosinandi E-Commerce Co., Ltd. Seller Ali Id 2215208724915 Member Id lxnd	<a href="mailto:andre@gotoptrade.com">andre@gotoptrade.com</a>
76	Fushun Nxcaps Clothing Company Limited Seller Ali Id 2211201734281 Member Id hatclothing	<a href="mailto:christine@hatclothing.com">christine@hatclothing.com</a>
77	Fuzhou Kuajin International Trading Co., Ltd. Seller Ali Id 2204184152389 Member Id kuajin	<a href="mailto:kuajinlanna@aliyun.com">kuajinlanna@aliyun.com</a>
81	Ganzhou Jianghuchuan Trade Co., Ltd. Seller Ali Id 2215676632942 Member Id oldmoney	<a href="mailto:gzjhc6688@163.com">gzjhc6688@163.com</a>
85	Guangdong Qian Lu Garment Co., Ltd. Seller Ali Id 2215490125058 Member Id qianlu88	<a href="mailto:mz657667203@163.com">mz657667203@163.com</a>
86	Guangxi Lingzhi Trading Co., Ltd. Seller Ali Id 2217021515197 Member Id lexus15778028546	<a href="mailto:15778028546@163.com">15778028546@163.com</a>

No.	Seller	Seller's Contact Information
87	Guangxi Pingxiang Honghai Technology Co.,ltd Seller Ali Id 2212548580583 Member Id honghai2021	pxhonghai@163.com
88	Guangxi Xiongxiong Technology Co., Ltd Seller Ali Id 2216563229225 Member Id xxkeji	13877135644@163.com
89	Guangzhou Aifuli Clothing Co., Ltd. Seller Ali Id 2213000738174 Member Id cnnorboe	ifreealice01@gmail.com
91	Guangzhou Baige Clothing Co., Ltd Seller Ali Id 2212788981262 Member Id bgfs26	821403372@qq.com
93	Guangzhou Blue Star Clothing Co., Ltd. Seller Ali Id 2208002630361 Member Id lanzhixing	18028139508@139.com
94	Guangzhou Bluewings Technology Co., Ltd. Seller Ali Id 2214794817045 Member Id gzbluewings	bluewingscoltd@gmail.com
95	Guangzhou Chu Feiya Trade Co., Ltd. Seller Ali Id 2209760865360 Member Id chufeiya	zhengyanling@chufeiya.com
97	Guangzhou Domin Company Limited Seller Ali Id 17380108727 Member Id gzdomin	sales01@gzdomin.com
98	Guangzhou Duojin Clothing Co., Ltd Seller Ali Id 2210030828845 Member Id duojin	1226695139@qq.com
100	Guangzhou Evawanna Shoes And Clothes Co., Ltd. Seller Ali Id 2211815880714 Member Id evawanna	evawanna0801@126.com
102	Guangzhou Fiona Clothing Co., Ltd Seller Ali Id 2215817195507 Member Id feiouna	m18126727411@163.com
103	Guangzhou Forward E-Commerce Co., Ltd. Seller Ali Id 2215468376256 Member Id luckyjackie	13632270209@aliyun.com
105	Guangzhou Gaia Garments Co., Ltd Seller Ali Id 2215592517465 Member Id gzgaia	8728672@qq.com
106	Guangzhou Gaosheng Garment Co., Ltd Seller Ali Id 2213256183222 Member Id gzgsfz	mark@gaoshenggarment.com
107	Guangzhou Gui Tong Trading Co., Ltd. Seller Ali Id 2206450310403 Member Id trendytao	inform@trendytao.com
108	Guangzhou Guruisi Clothing Co., Ltd. Seller Ali Id 2213300820560 Member Id goodrace	guruisi@gzguruisi.com
109	Guangzhou Hongyun Clothing Co., Ltd Seller Ali Id 2209237065480 Member Id hongyunclothing	hongyunclothing@163.com
111	Guangzhou iDesign Technology Co., Ltd Seller Ali Id 2213620340670 Member Id gzidesign	aimee@gzidesign.com
112	Guangzhou I-Feeling Clothing Co., Ltd. Seller Ali Id 2211559733561 Member Id ifeeling	justin@i-feelingclothing.com
115	Guangzhou Jiayan Trading Service Co., Ltd. Seller Ali Id 2213017868563 Member Id luxstore	435667833@qq.com

No.	Seller	Seller's Contact Information
117	Guangzhou Joye Accessories Co., Ltd. Seller Ali Id 2214444280496 Member Id sgjiashun	liqiang_77@outlook.com
119	Guangzhou Junli Apparel Co., Ltd Seller Ali Id 2210544702350 Member Id zhuoligarment	zhuoligarment@163.com
120	Guangzhou Junli Import And Export Co., Ltd. Seller Ali Id 2216011608490 Member Id gzjunlee	1912264057@qq.com
121	Guangzhou Lang buwan clothing Co.Ltd Seller Ali Id 2210300797363 Member Id looyaclothing Seller Ali Id 2210239764672 Member Id no1clothing	manager4@no1langbuwan.com manager1@no1langbuwan.com
122	Guangzhou Langbuwan Clothing Co., Ltd. Seller Ali Id 2210311734038 Member Id loohoclothing	manager2@no1langbuwan.com
123	Guangzhou Lanyiqi Trading Co., Ltd. Seller Ali Id 2214563422884 Member Id wonbinlv	287611586@qq.com
126	Guangzhou Linda Garments Co., Ltd Seller Ali Id 2213973758772 Member Id lingdafashion	lindalee@lingdafashion.com
128	Guangzhou Lixing Electronic Technology Co., Ltd. Seller Ali Id 2207249565765 Member Id lth123	leving_01@163.com
130	Guangzhou Meisen Garment Co., Ltd. Seller Ali Id 2215785129290 Member Id cnmszy	441932930@qq.com
131	Guangzhou Mengxintong Trading Co., Ltd. Seller Ali Id 2211930366238 Member Id tiantian0401	xuechan2006@163.com
133	Guangzhou Minmin Industrial Holding Co., Ltd. Seller Ali Id 2210538901191 Member Id minminclothes	1158194851@qq.com
134	Guangzhou Muhaban Trading Co., Ltd. Seller Ali Id 2216029344508 Member Id jamila2023	2149242490@qq.com
135	Guangzhou New Apparel Trade Company Limited Seller Ali Id 4035313132 Member Id fscaps	fscaps@hatclothing.com
137	Guangzhou Outpace Sportswear Co., Ltd. Seller Ali Id 2208506935253 Member Id cyyd1998	damon@op-sportswear.com
139	Guangzhou Prettysteps Garment Co., Ltd. Seller Ali Id 17381341985 Member Id prettysteps	export@prettysteps.com.cn
140	Guangzhou Pzf Garment Co., Ltd. Seller Ali Id 3081096308 Member Id ocn1688	pzf18138766600@163.com
141	Guangzhou Qiaoyi Clothing Co., Ltd Seller Ali Id 2214842328304 Member Id qiaoyifashion	13531292283@qq.com
142	Guangzhou Quintai Garment Company Ltd. Seller Ali Id 2962190462 Member Id qiaoyifashion	yangsen@gzqintai.com

No.	Seller	Seller's Contact Information
146	Guangzhou Samwestart Technology Co., Ltd. Seller Ali Id 17298874503 Member Id ali900154899	admin@samwestart.com
147	Guangzhou Sehe Apparel Co., Ltd Seller Ali Id 2901838112 Member Id sehefashion	hope@sehefashion.com
150	Guangzhou Shiwai Foreign Trade Clothing Co., Ltd Seller Ali Id 2207613322596 Member Id wjsw	1921849816@qq.com
151	Guangzhou Starry Clothing Ltd Seller Ali Id 2213265282013 Member Id cnstarryclothing66	chris@starryclothing.com
152	Guangzhou Suwo Trading Co., Ltd. Seller Ali Id 2211930864701 Member Id gzfindoutyl	gm1097404934@gmail.com
153	Guangzhou Taoyan Trading Co., Ltd. Seller Ali Id 2213311566932 Member Id taoyantrading	cathy@aixitrading.com
154	Guangzhou Twoway Fashion Industry Co., Ltd. Seller Ali Id 2216224382346 Member Id gotwoway	gotwoway@163.com
155	Guangzhou Van Yit Garment Co., Ltd. Seller Ali Id 2215607147615 Member Id fanyite	1041781185@qq.com
156	Guangzhou Vegas Clothing Co., Ltd Seller Ali Id 3862268474 Member Id cn1522805245tsxp	amiytang@gzvegas.cn
159	Guangzhou Xinchu Trading Co., Ltd. Seller Ali Id 2215602760594 Member Id gzxc168	952108727@qq.com
161	Guangzhou Yifany Technology Co., Ltd. Seller Ali Id 2215415301129 Member Id yf04020925	yfangela@yifany.com
162	Guangzhou Yilisha Garment Co., Ltd. Seller Ali Id 2210213476201 Member Id elisafashion	sales01@gzelisa.com
163	Guangzhou Yingjiaqi Clothing Co.,Ltd Seller Ali Id 2215524987909 Member Id yjclothes	sales01@gzyjq.com
164	Guangzhou Yinshi Apprael Co., Ltd. Seller Ali Id 2207538022486 Member Id gzyinshi	1090273233@qq.com
165	Guangzhou Yixin Trading Co., Ltd. Seller Ali Id 2212982154859 Member Id royalyixin	1324187927@qq.com
166	Guangzhou Youqi Trading Co., Ltd Seller Ali Id 2207597548510 Member Id youqiclothing	youqiclothing@aliyun.com
168	Guangzhou Yue Lu En Trading Co., Ltd. Seller Ali Id 2236595915 Member Id ylerosun	ylerosun@ylerosun.com

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169	Guangzhou Zhanhui International Supply Chain Management Co., Ltd. Seller Ali Id 4162605240 Member Id cn1524508818gbut	315577410@qq.com
170	Guangzhou Zhuo Fanming Trading Co., Ltd. Seller Ali Id 2215203608799 Member Id cn13076700401	1271577982@qq.com
172	Guangzhou Zhuoya Clothing Firm Seller Ali Id 2213890035794 Member Id dgzhuoya	yl18565967304@163.com
173	Guangzhou Zichen Clothing Co., Ltd. Seller Ali Id 2212487387202 Member Id zichenoem	lovekookoo@qq.com
174	Guangzhou Ziqi International Trading Ltd Seller Ali Id 2213034191510 Member Id allure0912	iamtinaren@qq.com
175	Guangzhou Ziya Network Technology Co., Ltd. Seller Ali Id 2215426534593 Member Id ziyaapparel	ziyali@ziyaapparel.com.cn
176	Guigang Tengguan Clothing Co., Ltd. Seller Ali Id 2216041751235 Member Id ggtg	tengguanfs@163.com
179	Hangzhou Fashion Oxygen Trade Co., Limited Seller Ali Id 2206774303730 Member Id 809c	shinyshinydesign@163.com
180	Hangzhou Huanwei Trading Co., Ltd. Seller Ali Id 2830910313 Member Id hzhuanwei	mary@hzhuanwei.com
181	Hangzhou Jiuxing Clothing Co., Ltd. Seller Ali Id 2207340190305 Member Id hzjxx	merittexu@126.com
182	Hangzhou Manbu Clothing Co., Ltd Seller Ali Id 2215225230108 Member Id grizzilla	t514559937@163.com
183	Hangzhou Yongyuan Technology Co., Ltd Seller Ali Id 2212551697066 Member Id maxyao	max15356148382@163.com
185	Hebei Ji Mi Clothing Co., Ltd. Seller Ali Id 2206376442099 Member Id hbjimi	molly@bu-chuan.com
186	Hebei Kang Sheng Yuan Sports Goods Co., Ltd Seller Ali Id 2928929708 Member Id jzksy	ksy@jzksy.com
188	Hefei Yaohai Zeyo Garment&accessory Firm Seller Ali Id 1833474911 Member Id zyxp123	772984387@qq.com
189	Henan Huanwei E-Business Co., Ltd. Seller Ali Id 3972370668 Member Id vsry	amy@vsry.net
190	Henan Songkun Import And Export Ltd Seller Ali Id 2216048157668 Member Id hnsongkun	henansongkun2020@163.com
191	Henan Songzhi Import And Export Co., Ltd. Seller Ali Id 2215203825703 Member Id henansongzhi	henansongzhi@163.com

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192	Henan Xiaokangning Import And Export Co., Ltd. Seller Ali Id 2216799425131 Member Id hnxkn	henanxiaokangning@163.com
193	Huizhou Qian Qian Industrial Co., Ltd. Seller Ali Id 1095227776414 Member Id cnqqtrading	qqtrading@189.cn
195	Hunan Chuanglan Supply Chain Management Co., Ltd. Seller Ali Id Hunan Chuanglan Supply Member Id chuanglan1	eunice@fashiondisc.com
196	Hunan Saiqun Network Co., Ltd. Seller Ali Id 2215595126219 Member Id hnsaiqun	hunansaiqun1@aliyun.com
199	Jianghua May F.m. Garment Co., Ltd. Seller Ali Id 2201709697318 Member Id wholesale6	daisy@cheerindustry.com
200	Jiangxi Zhaoye International Trade Co., Ltd. Seller Ali Id 2215608523885 Member Id zhaoyecorp	zhaoyegroup@163.com
201	Jiangxi Zhilin Imp&Exp Co., Ltd. Seller Ali Id 3970928914 Member Id jxzhilin	silviaxiong@jxzhilin.com
202	Jiangyin GET Garments Co., Ltd. Seller Ali Id 2213071205669 Member Idjygetfashion	826051777@qq.com
204	Jiaxing Coolsun Garment Co., Ltd. Seller Ali Id 3973612597 Member Id zjcoolsun	zjcoolsun@aliyun.com
206	Jinhua Taijun Household Products Co., Ltd. Seller Ali Id 2200728310292 Member Id tjbikini	sales@tjbikini.com
207	Jinhua Younamei Trading Co., Ltd. Seller Ali Id 2213320273094 Member Id younamei	229257554@qq.com
208	Jinjiang Liuming Trading Co., Ltd. Seller Ali Id 2206491440574 Member Idliumingjewelry Seller Ali Id 2206542304757 Member Id liuming666	liumingkallen2@163.com liumingkallen@163.com
211	KIMSHEIN LIMITED. Seller Ali Id 2211253405695 Member Id kimshein	julia@jsytrade.com
212	Lanzhou Limanying Trading Co., Ltd. Seller Ali Id 2212481538751 Member Id cnmuslim	limanying01@126.com
213	Lianze (guangzhou) Foreign Trade Clothing Co. Ltd. Seller Ali Id 2216103503675 Member Id wjwmlz	161448189@qq.com
214	Liaoning Yituo Garment Co., Ltd Seller Ali Id 2212651619256 Member Id seacup	li618892021@163.com
215	Licheng District Wangyao Trade Firm Seller Ali Id 2210068586525 Member Id bachenwy	bachendianzi@126.com
219	Maqvob Apparel Group Ltd. Seller Ali Id 2214458867261 Member Id cnmindi	davidshao1912@foxmail.com
220	MGOO GARMENT MANUFACTURING COMPANY LIMITED	mgoofashion@gmail.com

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	Seller Ali Id 2215946548191 Member Id vn1563671928ndfb	
221	Nanchang Zhongdianhong Trading Co., Ltd. Seller Ali Id 2215469416322 Member Id ncszdhsm	2364817083@qq.com
222	Nantong Loyalty Import And Export Co., Ltd Seller Ali Id 2216651414499 Member Id ntloyalty	loyalty0927@163.com
223	Nanyang Ruitao Trading Co., Ltd. Seller Ali Id 2215532535113 Member Id nyruitao	421738825@qq.com
225	NINGBO C.CLOTHING IMPORT & EXPORT CO., LTD. Seller Ali Id 2216950412005 Member Id cclothing	inno@ccllothing.cn
226	Ningbo Xingqi Import And Export Co., Ltd. Seller Ali Id 2215645817607 Member Id cnxingqi	jinny@nbxingqi.com
227	No.8 Shop (beijing) International Trade Co., Ltd. Seller Ali Id 2216300875206 Member Id zgbrothers	sales@zgbrothers.com
228	Number One Industrial Co., Ltd. Seller Ali Id 3446791951 Member Id noonwholesales	claire@ibmcgroup.net
229	One Dollar International Import & Export ( Guangzhou) Co., Ltd. Seller Ali Id 2210956652410 Member Id gzonedollar1	tangyi@gz-mingtai.com
230	Pingdingshan Sunn Technology Co., Ltd. Seller Ali Id 2212930075123 Member Id pdssekj	<u>pdssekj@163.com</u>
231	Qingdao Baohuiyang International Trade Co., Ltd. Seller Ali Id 2209956478129 Member Id baohuiyang	beixing_88@126.com
234	Quanzhou Fangcheng Trading Co., Ltd, Seller Ali Id 2215562327717 Member Id qzfmzy	<u>my448766411@qq.com</u>
235	Quanzhou Fotron Trading Co., Ltd. Seller Ali Id 2206497168520 Member Id polywellgroup	bruce@polywell-inc.com
236	Quanzhou Global Lover Garments Co., Ltd. Seller Ali Id 2621356479 Member Id globallover	120298206@qq.com
237	Quanzhou Huasong Information Technology Co., Ltd Seller Ali Id 2216761068769 Member Id huasong2023	huasong666@qq.com
239	Quanzhou Jinglimei Trading Co., Ltd. Seller Ali Id 2210566838600 Member Id jinglimeitrade	jinglimeitrade@foxmail.com
243	Quanzhou Mengmao Trading Co., Ltd. Seller Ali Id 2200732097063 Member Id romanticlegend	3254575667@qq.com

No.	Seller	Seller's Contact Information
244	Quanzhou Minshan Import & Export Trading Co. Seller Ali Id 2214082789932 Member Id mengmao Seller Ali Id 2212018811158 Member Id minthson Seller Ali Id 2208245521885 Member Id ecowalson	2164362193@qq.com coldker2021@yeah.net coldker2021@yeah.net
246	Quanzhou Minzhen Clothing Co., Ltd. Seller Ali Id 2211613462951 Member Id minzhenfushi	minzhenfushi@aliyun.com
247	Quanzhou No Resistance Trading Co., Ltd. Seller Ali Id 2214168133588 Member Id qzwzl	wuzuli1688@163.com
248	Quanzhou Onen Ecommerce Co., Ltd Seller Ali Id 2765926745 Member Id bestclothes	onenclothes@sina.com
249	Quanzhou Qingsong Trading Co., Ltd. Seller Ali Id 2215106661608 Member Id kingqingsong	mystylesh@qq.com
251	Quanzhou Shanshan Trading Co., Ltd Seller Ali Id 3502242274 Member Id cn1526724928qhev	3424414038@qq.com
252	Quanzhou Stamgon Trading Co., Ltd. Seller Ali Id 3064859204 Member Id stamgon	sales1@stamgon.com
253	Quanzhou Sunwear Enterprise Co., Ltd. Seller Ali Id 3853122285 Member Id qzswimsuits	sunwear_ali@sunwear.com. cn
254	Quanzhou Tianyi Clothing Co., Ltd Seller Ali Id 17379939603 Member Id qztianyi	annie@lover-baby.com
255	Quanzhou Walson Imp & Exp Co., Ltd Seller Ali Id 2143963066 Member Id instyles	instylesbestdress@163.com
256	Quanzhou Wensidi Trading Co., Ltd Seller Ali Id 2215600988559 Member Id wensidi	534375563@qq.com
257	Quanzhou Xuyou Technology Co., Ltd Seller Ali Id 2211035246005 Member Id qzxuyou	qzxuyou@163.com
258	Quanzhou Yetai Trading Co., Ltd. Seller Ali Id 2216192691344 Member Id qzyetai	1028846370@qq.com
259	Quanzhou Yibiao Sexy Lingerie Co., Ltd. Seller Ali Id 17380179560 Member Id cnqzyibiao	xiaomei1890@aliyun.com
260	Quanzhou Yingyi Trade Company Limited Seller Ali Id 2213307033062 Member Id cnyingyi	cnyingyi@163.com
261	Quanzhou Zhukuanghong Garments Co., Ltd Seller Ali Id 2215091082571 Member Id zhukuanghong	403145666@qq.com
262	Quanzhou Zichen Clothing Co., Ltd. Seller Ali Id 2212005518554 Member Id ziyunchen	c98581816@163.com

No.	Seller	Seller's Contact Information
263	Shaanxi Huiyi Core Goods Industry Co., Ltd. Seller Ali Id 2215410656544 Member Id hyxhsy	213123@qq.com
265	Shanghai Powertec Industry Co., Ltd. Seller Ali Id 3248670150 Member Id shbkgm	lucyyu@poresmax.com
267	Shanghai Rejie Industrial Co., Ltd. Seller Ali Id 2212983336868 Member Id shrejie	shangxuquan@icloud.com
269	Shanghai Yixixi Industry Co., Ltd. Seller Ali Id 2214740744609 Member Id easysh	catherine@shyixixi.com
270	Shanghai Youti Clothing Co., Ltd. Seller Ali Id 2206941338351 Member Id ipcompany	hanna@ipc-c.com
271	Shanghai Yubin Trading Co., Ltd. Seller Ali Id 2213131548442 Member Id shyubin	business@shanghaiyubin.com
272	Shangrao Oufeishan Technology Co., Ltd. Seller Ali Id 2214264357759 Member Id srofs2	p17157939999@163.com
274	Shantou Chaoyang District Guiyu Pengxing Knitting Factory Seller Ali Id 2206755223678 Member Id pengxing888	stpengxing@126.com
276	Shantou Hongli Clothing Co., Ltd. Seller Ali Id 2207705955470 Member Id hongliclothing	veronica_hongli@126.com
277	Shantou Linsee Knitwear Co., Ltd. Seller Ali Id 2214974573889 Member Id linseeknitwear	linsee2@bepartner.cn
278	Shanxi Ashley Bio-Tech Co., Ltd. Seller Ali Id 2215271875981 Member Id cn17696240423	ashley3240@163.com
280	Shanxi Titan Biotechnology Co., Ltd. Seller Ali Id 2216091573154 Member Id sxtitan	455890185@qq.com
282	Sheng Zhou Huijia Garment Co., Ltd. Seller Ali Id 2206644037421 Member Id sosohuijia	cnhuijia@163.com
283	Shenglong Swimming (huludao) Garment Trading Co., Ltd. Seller Ali Id 2215699063884 Member Id slyyhld	shenglong@slswimwear.com
285	Shenyang Willian Network Technology Co., Ltd. Seller Ali Id 2209135011511 Member Id sywlwl	434806372@qq.com
287	Shenzhen Changyuan Electronic Commerce Co., Ltd. Seller Ali Id 2211339722891 Member Id wyjean	214499369@qq.com
289	Shenzhen Fendi Jewelry Co., Ltd. Seller Ali Id 2206775576597 Member Id fendijewelry	fendijewelry@163.com
290	Shenzhen Hongxia Technology Co., Ltd. Seller Ali Id 2212501981333 Member Id szhongxia	sale@szhongxiaclothing.com

No.	Seller	Seller's Contact Information
291	Shenzhen Innoview Technology Co., Ltd. Seller Ali Id 2209944124714 Member Id innoviewtech	xuleping@innoviewtech.com
292	Shenzhen Jie Shi Ni Industrial Co., Ltd Seller Ali Id 3218291883 Member Id cn1520360352dxkc	michelle@jsnswimwear.com
294	Shenzhen Longgang District Qixuan Baby Underwear Factory (individual Business) Seller Ali Id 2201226483335 Member Id qixuanbaby	qixuanbaby168@163.com
296	Shenzhen Messa Garments Co., Ltd. Seller Ali Id 2201727537823 Member Id mingxiclothing	lulu@maxfashion.cn
297	Shenzhen Miumiu Jewelry Co., Ltd. Seller Ali Id 2213226172658 Member Id miumiujewelry	miumiujewelry@163.com
298	Shenzhen Momeishi Clothing Co., Ltd. Seller Ali Id 2211908416327 Member Id momeishi	lilyhongmomes@hotmai.com
299	Shenzhen Msg Technology Co., Ltd. Seller Ali Id 2207911809765 Member Id msgtech	18566689637@qq.com
300	Shenzhen New Greatwall Technology Co., Ltd. Seller Ali Id 17380967280 Member Id sznewgreatwall	bestbusiness@foxmail.com
302	Shenzhen Pinchen Technology Co., Ltd. Seller Ali Id 2208300708394 Member Id pinchen0512	pinchen0512@163.com
303	Shenzhen Qiu Tai International Media Co., Ltd. Seller Ali Id 2216055876696 Member Id qiutai	2922264353@qq.com
304	Shenzhen Siweiming Garment Trading Co., Ltd. Seller Ali Id 2210877114761 Member Id leva0215	carriesale@126.com
305	Shenzhen Tengwei Clothing Co., Ltd Seller Ali Id 2208314404258 Member Id tengweng	sales1@360tengweng.com
306	Shenzhen Wallis E-Commerce Co., Ltd. Seller Ali Id 2214095135906 Member Id wallis0429	wallis0429@163.com
307	Shenzhen Yannisfashion Commerce Co., Ltd Seller Ali Id 3026892066 Member Id yannisfashion	yannisfashion@163.com
309	Shenzhen ZFK Trade Co., Ltd. Seller Ali Id 2209796007215 Member Id zfksm	wuyuefeng0104@163.com
310	Shishi Baishiwei Garment Trading Co., Ltd. Seller Ali Id 2209001706817 Member Id bestwaycn	773103980@qq.com
311	Shishi Shiaiyng Garment Co., Ltd Seller Ali Id 2211529790763 Member Id anszktcn	1609432269@qq.com

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313	Sichuan Ronghui Jiuzhou Trading Co., Ltd. Seller Ali Id 2213012875476 Member Id clothingglobal	clothingglobal@aliyun.com
314	Suizhou Huaxi Trade Co., Ltd. Seller Ali Id 2211444943261 Member Id huaximaoyi	dduhomelighting@gmail.com
316	Tg Cup Industry Technology (hangzhou) Co., Ltd. Seller Ali Id 2210277452460 Member Id hztaigebeiye	z15268530980@163.com
318	Weihai Grand Legend Garment Co., Ltd. Seller Ali Id 2212587124479 Member Id whyichun	55348657@QQ.com
320	Xiamen Aicai Apparel Co., Ltd. Seller Ali Id 1095227622751 Member Id aicaiapparel	anna-aicaiapparel@hotmail.com
322	Xiamen Aiyiyang Trading Co., Ltd. Seller Ali Id 2214467542742 Member Id ayyxm	335875707@qq.com
323	Xiamen Bristter Sports Products Co., Ltd. Seller Ali Id 2208732391064 Member Id bristter	jack@xmbristter.com
324	Xiamen Cenxing Import And Export Co., Ltd. Seller Ali Id 17380439278 Member Id fashioneyewear	monica@xmcenxing.com
326	Xiamen Chuangyijia Trading Co., Ltd. Seller Ali Id 2211018660967 Member Id cnchuangyijia	1328750765@qq.com
328	Xiamen Fengway Imp. & Exp. Co., Ltd. Seller Ali Id 3423474915 Member Id xmfengway	tracy@xmfengway.com
329	Xiamen Gifter Import And Export Co., Ltd. Seller Ali Id 2216016389321 Member Id gifter02	577045323@qq.com
330	Xiamen Golden Bays Industrial Co., Limited Seller Ali Id 2211840982611 Member Id xmjzh	jzh15859576021@163.com
331	Xiamen Honore Supply Chain Management Co., Ltd. Seller Ali Id 2211193327447 Member Id 11honore	864505565@qq.com
332	Xiamen Jianyi Xinhong Trading Co., Ltd. Seller Ali Id 2209115171265 Member Id jyxh123	xmjyxhmy@163.com
333	Xiamen Jiyuxiang Garment Co., Ltd. Seller Ali Id 2209906924486 Member Id jiyuxiang	ljwu@pop-gloria.com
334	Xiamen Little Yumi Trade Co., Ltd. Seller Ali Id 2212882607818 Member Id littleyumi	342681532@qq.com
335	Xiamen M S G Garment Co., Ltd. Seller Ali Id 2215541014289 Member Id xmmsg	fitnessgarment23@hotmail.com
336	Xiamen Meibile Import And Export Co., Ltd. Seller Ali Id 2212394780937 Member Id homedeko	fsf218@126.com
337	Xiamen Moen Global Trading Co., Ltd. Seller Ali Id 3933459010 Member Id moendress	sindy@queenmoen.com

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338	Xiamen Moglovers Technology Co., Ltd. Seller Ali Id 2772234554 Member Id dearonline	tina@dear-online.com
339	Xiamen New Trend Trading Co., Ltd. Seller Ali Id 2212173602706 Member Id xmnewtrend	candy@newtrendxm.com
340	Xiamen Ningning Qi E-Commerce Co., Ltd. Seller Ali Id 2210671116745 Member Id trendyqueen	494921203@qq.com
342	Xiamen Pop Gloria International Trade Co., Ltd Seller Ali Id 2209813614863 Member Id xmpopgloria	aling.shang@pop-gloria.com
343	Xiamen Qinchang Apparel Co., Ltd. Seller Ali Id 2212443864672 Member Id woohoo666	qinchang666888@gmail.com
344	Xiamen Simian E-Business Co., Ltd. Seller Ali Id 2207263006037 Member Id lovelydress	hjl1989103@126.com
345	Xiamen Sipaisi Trading Co., Ltd Seller Ali Id 2206696618314 Member Id fjspace	925304181@qq.com
346	Xiamen Sky Pigeon Network Technology Co., Ltd. Seller Ali Id 2211526752563 Member Id daywork	tiangeb2b2022@163.com
348	Xiamen Starlights Supply Chain Co., Ltd. Seller Ali Id 2212322829534 Member Id starlightsltd Seller Ali Id 2211931776541 Member Id starlightscsco	starlightsltd@outlook.com starlights@starlightscsco.com
350	Xiamen Tongsiyuan Trading Co., Ltd. Seller Ali Id 3190971340 Member Id cn1520239894ffby	785828767@qq.com
351	Xiamen Unique Pretty Textile Clothing Co.,Ltd Seller Ali Id 2208579719880 Member Id youtaimei	risa@uniqueprettyclothing.com
352	Xiamen Weimiduo Industrial Co., Ltd. Seller Ali Id 2214687076851 Member Id weimiduo	davisefu@doteypopsy.com
353	Xiamen Xinyi Import And Export Co., Ltd. Seller Ali Id 2200593916217 Member Id xinyiapparel	rita@xinyi-apparel.com
354	Xiamen Yangfan Trading Co., Ltd Seller Ali Id 2207940646469 Member Id seeyf	2608737271@qq.com
355	Xiamen Yingleihong Electronic Commerce Co., Ltd. Seller Ali Id 2211847070144 Member Id xmleihong	leihong6528@163.com
356	Xingcheng Besali Sporting Goods Co., Ltd. Seller Ali Id 2216094260462 Member Id beisali	beisali2024@163.com
357	Xinxiang Jues Department Store Co., Ltd Seller Ali Id 2216767807608 Member Id xxjs88	xxjues@outlook.com
358	Xingcheng Dongshengda Garment Co., Ltd. Seller Ali Id 2212997787605 Member Id zuoheswimwear	917922716@QQ.COM

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359	Xinxiang Shiyuan Trading Co., Ltd. Seller Ali Id 2212402129976 Member Id xxsystem	amyguo@shiyuanshangmao.com
360	Xinxing County Adana Clothing Co., Ltd Seller Ali Id 2216303922219 Member Id cn1564713676panm	13662992125@163.com
361	Yamon (hangzhou) International Trade Co., Ltd Seller Ali Id 2215872833338 Member Id cnzweng	yamonbusiness@163.com
362	Yiwu Beiwo Trading Co., Ltd. Seller Ali Id 2200779387617 Member Id backwash	391697651@qq.com
363	Yiwu Changjie Trading Co., Ltd. Seller Ali Id 3974296537 Member Id changjie88	18621943372@163.com
364	Yiwu Chenxia E-Commerce Firm Seller Ali Id 2212317234783 Member Id btjewelry	baotuo2022@163.com
365	Yiwu Chenyan Jewelry Co., Ltd Seller Ali Id 2206929075518 Member Id cenyumjewelry	chenyanjewelry@gmail.com
367	Yiwu City Chenhao Trading Co., Ltd. Seller Ali Id 2209037470425 Member Id zjywch	xuelong1997@qq.com
368	Yiwu City Domy Garment Co., Ltd. Seller Ali Id 2207667935516 Member Id domy2020	domy001@domygarment.com
369	Yiwu Dajie Import And Export Co., Ltd. Seller Ali Id 2206887864844 Member Id dajie88	a13636458361@163.com
370	Yiwu Dingxin E-Commerce Co.,Ltd. Seller Ali Id 2209090238626 Member Id dingxin1	sofia@kaiding1.com
371	Yiwu Duoniu Import And Export Co., Ltd Seller Ali Id 2213867887927 Member Id cnduoniu2022	duoniu2022@aliyun.com
373	Yiwu Fengyao Garment Co., Ltd. Seller Ali Id 2202442347462 Member Id ywfengyao	yiwufengyao@126.com
377	Yiwu Huiyu E-Commerce Firm Seller Ali Id 2214752576982 Member Id onedistribution	qinzhang@huiyu123.com
378	Yiwu Kaiding Electronic Commerce Co., Ltd. Seller Ali Id 3252961031 Member Id kaiding1	amos@kaiding1.com
379	Yiwu Kejia Import And Export Co., Ltd. Seller Ali Id 3855388557 Member Idkejiacompany	mark@ywkejiacompany.com
380	Yiwu Lizhiyi Apparel Co., Ltd. Seller Ali Id 2207478761168 Member Id cnlizhiyi	1655309122@qq.com
383	Yiwu Maining Trading Co., Ltd. Seller Ali Id 2206935940787 Member Id mainingtrade	mainingtrade@aliyun.com

No.	Seller	Seller's Contact Information
385	Yiwu Mingqi Trading Co., Ltd. Seller Ali Id 2216044431278 Member Id mingqitrade	569163243@qq.com
387	Yiwu Motty Garment Co., Ltd. Seller Ali Id 3475945833 Member Id mottyzhang	15267949307@163.com
388	Yiwu Mozi Trade Company Limited Seller Ali Id 2211135522110 Member Id mozitrade	mozitrade@163.com
389	Yiwu Nuoyi Imp & Exp Co., Ltd Seller Ali Id 2200739518350 Member Id nuoyiapparel	jesse@cnoceansky.com
390	Yiwu Om Import And Export Co., Ltd. Seller Ali Id 4229765300 Member Id cnouming88	admin@saiki.top
391	Yiwu Orange Sui Import And Export Company Limited Seller Ali Id 2215270892140 Member Id orangesui	orangesui@outlook.com
393	Yiwu Pengrun Apparel Co., Ltd Seller Ali Id 2211604592499 Member Id ywpengrun	happygu@cnpoom.com
394	Yiwu Qiji Trading Co., Ltd Seller Ali Id 3916051240 Member Id qijitrading	qijitrading@aliyun.com
396	Yiwu S&y Trading Co., Ltd. Seller Ali Id 2206598342837 Member Id sallyxieshmily	sally_xie@sytradingshmily.com
397	Yiwu Saichen Import And Export Co., Ltd. Seller Ali Id 3875251428 Member Id saichen	248508251@qq.com
398	Yiwu Sangor Import And Export Co., Ltd. Seller Ali Id 1939223129 Member Id sangor	admin@sangorcaps.com
399	Yiwu Sangtu Import And Export Co., Ltd. Seller Ali Id 2209329454036 Member Id langheng99	langheng99@163.com
401	Yiwu Tixu E-Business Firm Seller Ali Id 2211489188430 Member Id tiyodesigner	865733883@qq.com
402	Yiwu Wenshuo Import And Export Co., Ltd Seller Ali Id 17380927018 Member Id wenshuofashion	stevenliang@wenshuo.net.cn
403	Yiwu Xiangjia Clothing Co., Ltd. Seller Ali Id 2215853920139 Member Id ywxiangjia	mina@xjxiangjia.com
404	Yiwu Xiaokan Electronic Commerce Firm Seller Ali Id 2210371740878 Member Id alxiaokan	alxiaokan@163.com
406	Yiwu Xinxin Import And Export Co., Ltd. Seller Ali Id 2211436169271 Member Id xinxinjewelry	xinxinnecklace@163.com
407	Yiwu Xinyu Garment Co., Ltd Seller Ali Id 2212409639314 Member Id ywxinyugarment	xinyugarment@qq.com

No.	Seller	Seller's Contact Information
408	Yiwu Xuanxin Trading Co., Ltd. Seller Ali Id 2208140663917 Member Id anneyam	yummyann@163.com
410	Yiwu Yayan Trading Co., Ltd. Seller Ali Id 2213852759750 Member Id yayanfrandy	frandyfu@yayantrade.com
411	Yiwu Yili Trading Firm Seller Ali Id 2215695134648 Member Id gzyilil	mefashion42@163.com
412	Yiwu Yinglei Trading Co., Ltd. Seller Ali Id 2211622037162 Member Id ylcompany	353534946@qq.com
413	Yiwu Yinpeng Healthy&Sport Article Co., Ltd. Seller Ali Id 3074768858 Member Id chinayinpeng	2429691753@qq.com
415	Yiwu Youlike Electronic Commerce Co., Ltd. Seller Ali Id 2209584376196 Member Id hhb570673214	bobofengzhijian@qq.com
416	Yuanhong Garment Accessory Co., Ltd. Seller Ali Id 17179896634 Member Id cnyuanhong	longlailtd@163.com
417	Yuanyang County Hengsen Department Store Co., Ltd. Seller Ali Id 2208453073440 Member Id yyhsbh	yuanyanghengsen@163.com
419	Zhangzhou Daimeng Clothing Co., Ltd. Seller Ali Id 2212771469326 Member Id damochic	rose@damochic.com
421	Zhejiang Bsofter Textile Co., Ltd Seller Ali Id 2212541981855 Member Id zjshuran	service@bsofter.com
422	Zhejiang G Top Clothing Co., Ltd. Seller Ali Id 2210878167080 Member Id gtopclothing	ritawu@gtopclothing.com
423	Zhengzhou Senyo Trading Co., Ltd. Seller Ali Id 2212400503128 Member Id zzsenyo	senyo0715yuan@163.com

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

**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-01807-VMK**

**Honorable Virginia M. Kendall  
Magistrate Gabriel A. Fuentes**

Hearing Date: November 26, 2024  
Hearing Time: 9:30 AM CT  
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 non-appearing Defendants Identified in Schedule “A” (the “Motion”) against which the Court has previously granted Entry of Clerk’s Default on June 25, 2024 [Dkt. No. 64] 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 June 25, 2024 against the Defaulted Defendants. [Dkt. No. 64.] 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 thirty-three (33) federally registered copyright protected images:

- |                   |                                     |                   |                   |
|-------------------|-------------------------------------|-------------------|-------------------|
| (1) VA0002369378  | (2) VA0002381204                    | (3) VA0002381206  | (4) VA0002381125  |
| (5) VA0002381126  | (6) VA0002381127                    | (7) VA0002381142  | (8) VA0002381156  |
| (9) VA0002381160  | (10) VA0002381161                   | (11) VA0002381162 | (12) VA0002381097 |
| (13) VA0002381101 | (14) VA0002381109                   | (15) VA0002381110 | (16) VA0002381111 |
| (17) VA0002381115 | (18) VA0002381116                   | (19) VA0002381117 | (20) VA0002379888 |
| (21) VA0002379893 | (22) VA0002379895                   | (23) VA0002379894 | (24) VA0002379907 |
| (25) VA0002379904 | (26) VA0002379881                   | (27) VA0002379911 | (28) VA0002380492 |
| (29) VA0002380491 | (30) VA0002379930                   | (31) VA0002379897 | (32) VA0002379895 |
| (33) VA0002379934 | (the “Copyright Protected Images”). |                   |                   |

6. As alleged in the Complaint, the Defaulted Defendants have displayed, without authorization, the Copyright Protected Images on the Amazon.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. 64.] 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 the another 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' 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: November 21, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (Bar No. 6299408)  
**BAYRAMOGLU LAW OFFICES LLC**  
1540 West Warm Springs Road Ste. 100  
Henderson, NV 89014  
Tel: (702) 462-5973 | Fax: (702) 553-3404  
shawnmangano@bayramoglu-legal.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21st day of November 2024, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and 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, Alibaba.

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

# Exhibit 1

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
1	Guangzhou Baiyun District Ka Ya Te Garment Factory Seller Ali Id 2318142448	VA0002379904 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
2	Alibaba (zhongguo)wangluojishuyouxiangongsi Seller Ali Id 2217241433921	VA0002379881 VA0002380492 VA0002380491 VA0002379888	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>
5	Beijing Boningsai Trading Co., Ltd. Seller Ali Id 2214575013601	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
6	Changsha Ox Arts & Crafts Co., Ltd. Seller Ali Id 2210557687578	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
7	Changsha Zhezhe Clothing Co., Ltd. Seller Ali Id 2212382857597	VA0002379894 VA0002379888	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
9	Changzhou Swimshark Garments Co., Ltd. Seller Ali Id 2215875044329	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
11	Chongqing Gooney Information Technology Co.,Ltd. Seller Ali Id 2212465769559	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
12	Chongqing Xuesheng Clothing Ltd., Company Seller Ali Id 2214069948280	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
13	Dadao Gonghe (Shenzhen) Garment Co., Ltd. Seller Ali Id 2213257986992	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
14	Dalian Tianzige Dress Design Co., Ltd. Seller Ali Id 2212658274015	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
16	Dongguan Boxiang Garment Co., Ltd. Seller Ali Id 3567299678	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
18	Dongguan Chengwang Trading Co., Ltd. Seller Ali Id 2213327338183	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
19	Dongguan Chuangdian Garment Co., Ltd. Seller Ali Id 2215060147230	VA0002381142 VA0002381155 VA0002381156 3D Image	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
21	Dongguan City Jingyu Apparel Co., Ltd. Seller Ali Id 2212268638888	VA0002379895 VA0002379894	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
22	Dongguan Dafeng Garment Co., Ltd. Seller Ali Id 2213948562126	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
23	Dongguan Dalang Muzhifeng Trade Department Seller Ali Id 2216424582546	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
26	Dongguan Fnjia Knitwear Co., Ltd. Seller Ali Id 2208410919462	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
27	DONGGUAN FUXING KNITTING GARMENTS CO.,LTD Seller Ali Id 2215223048315	VA0002380492 VA0002369378	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
28	Dongguan Gina Import & Export Co., Ltd Seller Ali Id 3243578752	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
29	Dongguan Ginwen Garment Co., Ltd Seller Ali Id 17381384181	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
38	Dongguan Jinghong Foreign Trade Clothing Co., Ltd. Seller Ali Id 2208757504323	VA0002379930 VA0002379911 VA0002379894	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
40	Dongguan Kaqi Garment Co., Ltd. Seller Ali Id 2208456705434	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
42	Dongguan Liziyuan Clothing Co., Ltd. Seller Ali Id 2213243414083	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
43	Dongguan Manni Dress Co., Ltd. Seller Ali Id 17380611704	VA0002379881 VA0002380492 VA0002379888	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
44	Dongguan Meiya Apparel Co., Ltd. Seller Ali Id 2215399707289	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
45	Dongguan Miao Sheng Clothing Co., Ltd. Seller Ali Id 2214395586878	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
46	Dongguan Mingge Knitting Garment Co., Ltd. Seller Ali Id 2211090413966	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
47	Dongguan Qian Yong Clothing Co., Ltd. Seller Ali Id 2216898085668	VA0002379888 VA0002381160 VA0002381161 VA0002381162 3D Image	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
48	Dongguan Qianxi Technology Co., Ltd. Seller Ali Id 2214568598962	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
49	Dongguan Qishun Clothing Co., Ltd. Seller Ali Id 2212388689453	VA0002380492 VA0002379895 VA0002379881	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
50	Dongguan Ruichi Fashion Co., Ltd. Seller Ali Id 2215035387795	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
51	Dongguan Sanniu Clothing Co., Ltd Seller Ali Id 2215743137707	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
53	Dongguan Shengde Clothing Co., Ltd. Seller Ali Id 2211817438199	VA0002380491	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
54	Dongguan Shenjie Clothing Co., Ltd Seller Ali Id 2210011994102	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
55	Dongguan Shinny Import & Export Ltd. Seller Ali Id 3594997623	VA0002380492 VA0002379881 VA0002379911 VA0002379895  VA0002381115 VA0002381116 VA0002381117 3D Image	<b>\$5,000.00 x5</b>	<b>Total: \$75,000.00</b>
56	Dongguan Sky & Star Fashion Co., Ltd. Seller Ali Id 2175593641	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
57	Dongguan Sun Denean Clothing Co., Ltd. Seller Ali Id 2211209465658	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
58	Dongguan VF Garment Co., Ltd. Seller Ali Id 3251836537	VA0002379907	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
59	Dongguan Xibolin Garment Co., Ltd Seller Ali Id 2213859086223	VA0002379904 VA0002379911	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
60	Dongguan Xiyi Clothing Co., Ltd. Seller Ali Id 2215196732170	VA0002381160 VA0002381161 VA0002381162 3D Image	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
61	Dongguan Yalen Clothing Co., Ltd. Seller Ali Id 2051263593	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
66	Dongguan YiYang Clothing Co., Ltd Seller Ali Id 2214233222935	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
68	Dongguan Yunya Fashion Co., Ltd. Seller Ali Id 3027741321	VA0002379881 VA0002380491	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
69	Dongguan Zhongyi Clothing Co., Ltd. Seller Ali Id 2207771777539	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
71	Foshan Faoumei Garment Co., Ltd Seller Ali Id 2215261348923	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
73	Fujian Century Yeung Pok Import And Export Co., Ltd. Seller Ali Id 2211576783717	VA0002379881 VA0002379894 VA0002380492	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
74	Fujian Rosinandi E-Commerce Co., Ltd. Seller Ali Id 2215208724915	VA0002369387	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
76	Fushun Nxcaps Clothing Company Limited Seller Ali Id 2211201734281	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
77	Fuzhou Kuajin International Trading Co., Ltd. Seller Ali Id 2204184152389	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

## 296 Defaulted Defendants Infringements - 1807

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
81	Ganzhou Jianghuchuan Trade Co., Ltd. Seller Ali Id 2215676632942	VA0002379895 VA0002381115 VA0002381116 VA0002381117 3D Image	\$5,000.00 x2	Total: \$30,000.00
85	Guangdong Qian Lu Garment Co., Ltd. Seller Ali Id 2215490125058	VA0002379893	\$5,000.00	Total: \$15,000.00
86	Guangxi Lingzhi Trading Co., Ltd. Seller Ali Id 2217021515197	VA0002379881	\$5,000.00	Total: \$15,000.00
87	Guangxi Pingxiang Honghai Technology Co.,ltd Seller Ali Id 2212548580583	VA0002379895	\$5,000.00	Total: \$15,000.00
88	Guangxi Xiongxiang Technology Co., Ltd Seller Ali Id 2216563229225	VA0002379904	\$5,000.00	Total: \$15,000.00
89	Guangzhou Aifuli Clothing Co., Ltd. Seller Ali Id 2213000738174	VA0002380491	\$5,000.00	Total: \$15,000.00
91	Guangzhou Baige Clothing Co., Ltd Seller Ali Id 2212788981262	VA0002379895	\$5,000.00	Total: \$15,000.00
93	Guangzhou Blue Star Clothing Co., Ltd. Seller Ali Id 2208002630361	VA0002380492 VA0002379911 VA0002379894	\$5,000.00 x3	Total: \$45,000.00
94	Guangzhou Bluewings Technology Co., Ltd. Seller Ali Id 2214794817045	VA0002379881 VA0002379894 VA0002379888 VA0002379893	\$5,000.00 x4	Total: \$60,000.00
95	Guangzhou Chu Feiya Trade Co., Ltd. Seller Ali Id 2209760865360	VA0002379881 VA0002379893	\$5,000.00 x2	Total: \$30,000.00
97	Guangzhou Domin Company Limited Seller Ali Id 17380108727	VA0002379881	\$5,000.00	Total: \$15,000.00
98	Guangzhou Duojin Clothing Co., Ltd Seller Ali Id 2210030828845	VA0002380492 VA0002379881 VA0002379888 VA0002379893	\$5,000.00 x4	Total: \$60,000.00

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
100	Guangzhou Evawanna Shoes And Clothes Co., Ltd. Seller Ali Id 2211815880714	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
102	Guangzhou Fiona Clothing Co., Ltd Seller Ali Id 2215817195507	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
103	Guangzhou Forward E-Commerce Co., Ltd. Seller Ali Id 2215468376256	VA0002379888	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
105	Guangzhou Gaia Garments Co., Ltd Seller Ali Id 2215592517465	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
106	Guangzhou Gaosheng Garment Co., Ltd Seller Ali Id 2213256183222	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
107	Guangzhou Gui Tong Trading Co., Ltd. Seller Ali Id 2206450310403	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
108	Guangzhou Guruisi Clothing Co., Ltd. Seller Ali Id 2213300820560	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
109	Guangzhou Hongyun Clothing Co., Ltd Seller Ali Id 2209237065480	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
111	Guangzhou iDesign Technology Co., Ltd Seller Ali Id 2213620340670	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
112	Guangzhou I-Feeling Clothing Co., Ltd. Seller Ali Id 2211559733561	VA0002379888 VA0002379895	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
115	Guangzhou Jiayan Trading Service Co., Ltd. Seller Ali Id 2213017868563	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
117	Guangzhou Joye Accessories Co., Ltd. Seller Ali Id 2214444280496	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
119	Guangzhou Junli Apparel Co., Ltd Seller Ali Id 2210544702350	VA0002379894 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
120	Guangzhou Junli Import And Export Co., Ltd. Seller Ali Id 2216011608490	VA0002380491	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
121	Guangzhou Lang buwan clothing Co.Ltd Seller Ali Id 2210300797363 Seller Ali Id 2210239764672	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
122	Guangzhou Langbuwan Clothing Co., Ltd. Seller Ali Id 2210311734038	VA0002379894 VA0002379881	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
123	Guangzhou Lanyiqi Trading Co., Ltd. Seller Ali Id 2214563422884	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
126	Guangzhou Linda Garments Co., Ltd Seller Ali Id 2213973758772	VA0002379904 VA0002379881	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
128	Guangzhou Lixing Electronic Technology Co., Ltd. Seller Ali Id 2207249565765	VA0002379911 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
130	Guangzhou Meisen Garment Co., Ltd. Seller Ali Id 2215785129290	VA0002381115 VA0002381116 VA0002381117 3D Image	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
131	Guangzhou Mengxintong Trading Co., Ltd. Seller Ali Id 2211930366238	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
133	Guangzhou Minmin Industrial Holding Co., Ltd. Seller Ali Id 2210538901191	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
134	Guangzhou Muhaban Trading Co., Ltd. Seller Ali Id 2216029344508	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
135	Guangzhou New Apparel Trade Company Limited Seller Ali Id 4035313132	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
137	Guangzhou Outpace Sportswear Co., Ltd. Seller Ali Id 2208506935253	VA0002381115 VA0002381116 VA0002381117 3D Image	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
139	Guangzhou Prettysteps Garment Co., Ltd. Seller Ali Id 17381341985	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
140	Guangzhou Pzf Garment Co., Ltd. Seller Ali Id 3081096308	VA0002379881 VA0002379895	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
141	Guangzhou Qiaoyi Clothing Co., Ltd Seller Ali Id 2214842328304	VA0002379895 VA0002379881	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
142	Guangzhou Qintai Garment Company Ltd. Seller Ali Id 2962190462	VA0002379911	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
146	Guangzhou Samwestart Technology Co., Ltd. Seller Ali Id 17298874503	VA0002380491	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
147	Guangzhou Sehe Apparel Co., Ltd Seller Ali Id 2901838112	VA0002380492 VA0002379911 VA0002379894 VA0002379888 VA0002379881 VA0002379895 VA0002379893	<b>\$5,000.00 x7</b>	<b>Total: \$105,000.00</b>
150	Guangzhou Shiwai Foreign Trade Clothing Co., Ltd Seller Ali Id 2207613322596	VA0002379881 VA0002380491 VA0002380492 VA0002379894 VA0002379888	<b>\$5,000.00 x5</b>	<b>Total: \$75,000.00</b>
151	Guangzhou Starry Clothing Ltd Seller Ali Id 2213265282013	VA0002379881 VA0002379904	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
152	Guangzhou Suwo Trading Co., Ltd. Seller Ali Id 2211930864701	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
153	Guangzhou Taoyan Trading Co., Ltd. Seller Ali Id 2213311566932	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
154	Guangzhou Twoway Fashion Industry Co., Ltd. Seller Ali Id 2216224382346	VA0002380492 VA0002381125 VA0002381126 VA0002381127 3D Image	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>

## 296 Defaulted Defendants Infringements - 1807

No	Name	Infringement	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
155	Guangzhou Van Yit Garment Co., Ltd. Seller Ali Id 2215607147615	VA0002379897 VA0002379881 VA0002379894 VA0002379893 VA0002379911 VA0002379888 VA0002379899  VA0002381109 VA0002381110 VA0002381111 3D Image	\$5,000.00 x8	Total: \$120,000.00
156	Guangzhou Vegas Clothing Co., Ltd Seller Ali Id 3862268474	VA0002379904	\$5,000.00	Total: \$15,000.00
159	Guangzhou Xinchu Trading Co., Ltd. Seller Ali Id 2215602760594	VA0002380492	\$5,000.00	Total: \$15,000.00
161	Guangzhou Yifany Technology Co., Ltd. Seller Ali Id 2215415301129	VA0002380491	\$5,000.00	Total: \$15,000.00
162	Guangzhou Yilisha Garment Co., Ltd. Seller Ali Id 2210213476201	VA0002379881	\$5,000.00	Total: \$15,000.00
163	Guangzhou Yingjiaqi Clothing Co.,Ltd Seller Ali Id 2215524987909	VA0002379881 VA0002379895 VA0002379888	\$5,000.00 x3	Total: \$45,000.00
164	Guangzhou Yinshi Apprael Co., Ltd. Seller Ali Id 2207538022486	VA0002379895	\$5,000.00	Total: \$15,000.00
165	Guangzhou Yixin Trading Co., Ltd. Seller Ali Id 2212982154859	VA0002379881	\$5,000.00	Total: \$15,000.00
166	Guangzhou Youqi Trading Co., Ltd Seller Ali Id 2207597548510	VA0002380492 VA0002379904	\$5,000.00 x2	Total: \$30,000.00
168	Guangzhou Yue Lu En Trading Co., Ltd. Seller Ali Id 2236595915	VA0002380492	\$5,000.00	Total: \$15,000.00

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
169	Guangzhou Zhanhui International Supply Chain Management Co., Ltd. Seller Ali Id 4162605240	VA0002380491 VA0002381097 VA0002381101 VA0002381108 3D Image	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
170	Guangzhou Zhuo Fanming Trading Co., Ltd. Seller Ali Id 2215203608799	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
172	Guangzhou Zhuoya Clothing Firm Seller Ali Id 2213890035794	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
173	Guangzhou Zichen Clothing Co., Ltd. Seller Ali Id 2212487387202	VA0002379904 VA0002379881 VA0002380492	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
174	Guangzhou Ziqi International Trading Ltd Seller Ali Id 2213034191510	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
175	Guangzhou Ziya Network Technology Co., Ltd. Seller Ali Id 2215426534593	VA0002379894 VA0002379934 VA0002379888	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
176	Guigang Tengguan Clothing Co., Ltd. Seller Ali Id 2216041751235	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
179	Hangzhou Fashion Oxygen Trade Co., Limited Seller Ali Id 2206774303730	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
180	Hangzhou Huanwei Trading Co., Ltd. Seller Ali Id 2830910313	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
181	Hangzhou Jiuxing Clothing Co., Ltd. Seller Ali Id 2207340190305	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
182	Hangzhou Manbu Clothing Co., Ltd Seller Ali Id 2215225230108	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
183	Hangzhou Yongyuan Technology Co., Ltd Seller Ali Id 2212551697066	VA0002379904 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
185	Hebei Ji Mi Clothing Co., Ltd. Seller Ali Id 2206376442099	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
186	Hebei Kang Sheng Yuan Sports Goods Co., Ltd Seller Ali Id 2928929708	VA0002379881 VA0002379894  VA0002381115 VA0002381116 VA0002381117 3D Image	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
188	Hefei Yaohai Zeyo Garment&accessory Firm Seller Ali Id 1833474911	VA0002379881 VA0002379904	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
189	Henan Huanwei E-Business Co., Ltd. Seller Ali Id 3972370668	VA0002380492 VA0002379888	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
190	Henan Songkun Import And Export Ltd Seller Ali Id 2216048157668	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
191	Henan Songzhi Import And Export Co., Ltd. Seller Ali Id 2215203825703	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
192	Henan Xiaokangning Import And Export Co., Ltd. Seller Ali Id 2216799425131	VA0002380492 VA0002379881 VA0002379895 VA0002379904	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>
193	Huizhou Qian Qian Industrial Co., Ltd. Seller Ali Id 1095227776414	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
195	Hunan Chuanglan Supply Chain Management Co., Ltd. Seller Ali Id Hunan Chuanglan Supply	VA0002379881 VA0002380491 VA0002380492	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
196	Hunan Saiqun Network Co., Ltd. Seller Ali Id 2215595126219	VA0002379888 VA0002379893 VA0002379904	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
199	Jianghua May F.m. Garment Co., Ltd. Seller Ali Id 2201709697318	VA0002379881 VA0002379911 VA0002379895	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
200	Jiangxi Zhaoye International Trade Co., Ltd. Seller Ali Id 2215608523885	VA0002380492 VA0002379888	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
201	Jiangxi Zhilin Imp&Exp Co., Ltd. Seller Ali Id 3970928914	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
202	Jiangyin GET Garments Co., Ltd. Seller Ali Id 2213071205669	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
204	Jiaxing Coolsun Garment Co., Ltd. Seller Ali Id 3973612597	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
206	Jinhua Taijun Household Products Co., Ltd. Seller Ali Id 2200728310292	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
207	Jinhua Younamei Trading Co., Ltd. Seller Ali Id 2213320273094	VA0002379888 VA0002379893	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
208	Jinjiang Liuming Trading Co., Ltd. Seller Ali Id 2206491440574 Seller Ali Id 2206542304757	VA0002379888 VA0002379881	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
211	KIMSHEIN LIMITED. Seller Ali Id 2211253405695	VA0002380491	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
212	Lanzhou Limanying Trading Co., Ltd. Seller Ali Id 2212481538751	VA0002380491	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
213	Lianze (guangzhou) Foreign Trade Clothing Co. Ltd. Seller Ali Id 2216103503675	VA0002379888	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
214	Liaoning Yituo Garment Co., Ltd Seller Ali Id 2212651619256	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
215	Licheng District Wangyao Trade Firm Seller Ali Id 2210068586525	VA0002380491 VA0002379894 VA0002379895	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
219	Maqvob Apparel Group Ltd. Seller Ali Id 2214458867261	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
220	MGOO GARMENT MANUFACTURING COMPANY LIMITED Seller Ali Id 2215946548191	VA0002379897	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
221	Nanchang Zhongdianhong Trading Co., Ltd. Seller Ali Id 2215469416322	VA0002379894 VA0002379895	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
222	Nantong Loyalty Import And Export Co., Ltd Seller Ali Id 2216651414499	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
223	Nanyang Ruitao Trading Co., Ltd. Seller Ali Id 2215532535113	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
225	NINGBO C.CLOTHING IMPORT & EXPORT CO., LTD. Seller Ali Id 2216950412005	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
226	Ningbo Xingqi Import And Export Co., Ltd. Seller Ali Id 2215645817607	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
227	No.8 Shop (beijing) International Trade Co., Ltd. Seller Ali Id 2216300875206	VA0002379895 VA0002380492 VA0002379881	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
228	Number One Industrial Co., Ltd. Seller Ali Id 3446791951	VA0002379881 VA0002379895	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
229	One Dollar International Import & Export (Guangzhou) Co., Ltd. Seller Ali Id 2210956652410	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
230	Pingdingshan Sunn Technology Co., Ltd. Seller Ali Id 2212930075123	VA0002379881 VA0002379911	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
231	Qingdao Baohuiyang International Trade Co., Ltd. Seller Ali Id 2209956478129	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
234	Quanzhou Fangcheng Trading Co., Ltd, Seller Ali Id 2215562327717	VA0002379881 VA0002379904	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
235	Quanzhou Fotron Trading Co., Ltd. Seller Ali Id 2206497168520	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
236	Quanzhou Global Lover Garments Co., Ltd. Seller Ali Id 2621356479	VA0002379881 VA0002379934 VA0002379897 VA0002379893 VA0002379888 VA0002379894	<b>\$5,000.00 x6</b>	<b>Total: \$90,000.00</b>
237	Quanzhou Huasong Information Technology Co., Ltd Seller Ali Id 2216761068769	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
239	Quanzhou Jinglimei Trading Co., Ltd. Seller Ali Id 2210566838600	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
243	Quanzhou Mengmao Trading Co., Ltd. Seller Ali Id 2200732097063	VA0002380492 VA0002379895	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
244	Quanzhou Minshan Import & Export Trading Co. Seller Ali Id 2214082789932 Seller Ali Id 2212018811158 Seller Ali Id 2208245521885	VA0002379904 VA0002379881  VA0002381160 VA0002381161 VA0002381162 3D Image	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
246	Quanzhou Minzhen Clothing Co., Ltd. Seller Ali Id 2211613462951	VA0002380491 VA0002379888	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
247	Quanzhou No Resistance Trading Co., Ltd. Seller Ali Id 2214168133588	VA0002379888	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
248	Quanzhou Onen Ecommerce Co., Ltd Seller Ali Id 2765926745	VA0002379895 VA0002379888	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
249	Quanzhou Qingsong Trading Co., Ltd. Seller Ali Id 2215106661608	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
251	Quanzhou Shanshan Trading Co., Ltd Seller Ali Id 3502242274	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
252	Quanzhou Stamgon Trading Co., Ltd. Seller Ali Id 3064859204	VA0002381115 VA0002381116 VA0002381117 3D Image	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
253	Quanzhou Sunwear Enterprise Co., Ltd. Seller Ali Id 3853122285	VA0002379888	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
254	Quanzhou Tianyi Clothing Co., Ltd Seller Ali Id 17379939603	VA0002379888 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
255	Quanzhou Walson Imp & Exp Co., Ltd Seller Ali Id 2143963066	VA0002379881 VA0002380492 VA0002379895	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
256	Quanzhou Wensidi Trading Co., Ltd Seller Ali Id 2215600988559	VA0002380492 VA0002379894	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
257	Quanzhou Xuyou Technology Co., Ltd Seller Ali Id 2211035246005	VA0002379899	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
258	Quanzhou Yetai Trading Co., Ltd. Seller Ali Id 2216192691344	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
259	Quanzhou Yibiao Sexy Lingerie Co., Ltd. Seller Ali Id 17380179560	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
260	Quanzhou Yingyi Trade Company Limited Seller Ali Id 2213307033062	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
261	Quanzhou Zhukuanghong Garments Co., Ltd Seller Ali Id 2215091082571	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
262	Quanzhou Zichen Clothing Co., Ltd. Seller Ali Id 2212005518554	VA0002380492 VA0002379881 VA0002379888	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
263	Shaanxi Huiyi Core Goods Industry Co., Ltd. Seller Ali Id 2215410656544	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
265	Shanghai Powertec Industry Co., Ltd. Seller Ali Id 3248670150	VA0002379897 VA0002379881 VA0002380492 VA0002379894	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
267	Shanghai Rejie Industrial Co., Ltd. Seller Ali Id 2212983336868	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
269	Shanghai Yixixi Industry Co., Ltd. Seller Ali Id 2214740744609	VA0002379881 VA0002379904	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
270	Shanghai Youti Clothing Co., Ltd. Seller Ali Id 2206941338351	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
271	Shanghai Yubin Trading Co., Ltd. Seller Ali Id 2213131548442	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
272	Shangrao Oufeishan Technology Co., Ltd. Seller Ali Id 2214264357759	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
274	Shantou Chaoyang District Guiyu Pengxing Knitting Factory Seller Ali Id 2206755223678	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
276	Shantou Hongli Clothing Co., Ltd. Seller Ali Id 2207705955470	VA0002380492 VA0002379881	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
277	Shantou Linsee Knitwear Co., Ltd. Seller Ali Id 2214974573889	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
278	Shanxi Ashley Bio-Tech Co., Ltd. Seller Ali Id 2215271875981	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
280	Shanxi Titan Biotechnology Co., Ltd. Seller Ali Id 2216091573154	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
282	Sheng Zhou Huijia Garment Co., Ltd. Seller Ali Id 2206644037421	VA0002380492 VA0002379911	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
283	Shenglong Swimming (huludao) Garment Trading Co., Ltd. Seller Ali Id 2215699063884	VA0002379888	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
285	Shenyang Willian Network Technology Co., Ltd. Seller Ali Id 2209135011511	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
287	Shenzhen Changyuan Electronic Commerce Co., Ltd. Seller Ali Id 2211339722891	VA0002379881 VA0002379911 VA0002380492 VA0002379904	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>
289	Shenzhen Fendi Jewelry Co., Ltd. Seller Ali Id 2206775576597	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
290	Shenzhen Hongxia Technology Co., Ltd. Seller Ali Id 2212501981333	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
291	Shenzhen Innoview Technology Co., Ltd. Seller Ali Id 2209944124714	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
292	Shenzhen Jie Shi Ni Industrial Co., Ltd Seller Ali Id 3218291883	VA0002379930	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
294	Shenzhen Longgang District Qixuan Baby Underwear Factory (individual Business) Seller Ali Id 2201226483335	VA0002380491 VA0002379904	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
296	Shenzhen Messa Garments Co., Ltd. Seller Ali Id 2201727537823	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
297	Shenzhen Miumiu Jewelry Co., Ltd. Seller Ali Id 2213226172658	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
298	Shenzhen Momeishi Clothing Co., Ltd. Seller Ali Id 2211908416327	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
299	Shenzhen Msg Technology Co., Ltd. Seller Ali Id 2207911809765	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
300	Shenzhen New Greatwall Technology Co., Ltd. Seller Ali Id 17380967280	VA0002380492 VA0002379895	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
302	Shenzhen Pinchen Technology Co., Ltd. Seller Ali Id 2208300708394	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
303	Shenzhen Qiu Tai International Media Co., Ltd. Seller Ali Id 2216055876696	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
304	Shenzhen Siweiming Garment Trading Co., Ltd. Seller Ali Id 2210877114761	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
305	Shenzhen Tengwei Clothing Co., Ltd Seller Ali Id 2208314404258	VA0002379930	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
306	Shenzhen Wallis E-Commerce Co., Ltd. Seller Ali Id 2214095135906	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
307	Shenzhen Yannisfashion Commerce Co., Ltd Seller Ali Id 3026892066	VA0002379881 VA0002380492 VA0002379894 VA0002379888 VA0002379893 VA0002379904	<b>\$5,000.00 x6</b>	<b>Total: \$90,000.00</b>
309	Shenzhen ZFK Trade Co., Ltd. Seller Ali Id 2209796007215	VA0002379894 VA0002379911 VA0002379895	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
310	Shishi Baishiwei Garment Trading Co., Ltd. Seller Ali Id 2209001706817	VA0002379930	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
311	Shishi Shiaiying Garment Co., Ltd Seller Ali Id 2211529790763	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
313	Sichuan Ronghui Jiuzhou Trading Co., Ltd. Seller Ali Id 2213012875476	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
314	Suizhou Huaxi Trade Co., Ltd. Seller Ali Id 2211444943261	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
316	Tg Cup Industry Technology (hangzhou) Co., Ltd. Seller Ali Id 2210277452460	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
318	Weihai Grand Legend Garment Co., Ltd. Seller Ali Id 2212587124479	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
320	Xiamen Aicai Apparel Co., Ltd. Seller Ali Id 1095227622751	VA0002379895 VA0002379881 VA0002379911 VA0002380492	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
322	Xiamen Aiyiyang Trading Co., Ltd. Seller Ali Id 2214467542742	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
323	Xiamen Bristter Sports Products Co., Ltd. Seller Ali Id 2208732391064	VA0002379895 VA0002379881	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
324	Xiamen Cenxing Import And Export Co., Ltd. Seller Ali Id 17380439278	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
326	Xiamen Chuangyijia Trading Co., Ltd. Seller Ali Id 2211018660967	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
328	Xiamen Fengway Imp. & Exp. Co., Ltd. Seller Ali Id 3423474915	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
329	Xiamen Gifter Import And Export Co., Ltd. Seller Ali Id 2216016389321	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
330	Xiamen Golden Bays Industrial Co., Limited Seller Ali Id 2211840982611	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
331	Xiamen Honore Supply Chain Management Co., Ltd. Seller Ali Id 2211193327447	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
332	Xiamen Jianyi Xinhong Trading Co., Ltd. Seller Ali Id 2209115171265	VA0002380492 VA0002379894	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
333	Xiamen Jiyuxiang Garment Co., Ltd. Seller Ali Id 2209906924486	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
334	Xiamen Little Yumi Trade Co., Ltd. Seller Ali Id 2212882607818	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
335	Xiamen M S G Garment Co., Ltd. Seller Ali Id 2215541014289	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
336	Xiamen Meibile Import And Export Co., Ltd. Seller Ali Id 2212394780937	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
337	Xiamen Moen Global Trading Co., Ltd. Seller Ali Id 3933459010	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
338	Xiamen Moglovers Technology Co., Ltd. Seller Ali Id 2772234554	VA0002379881 VA0002379897 VA0002379888	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
339	Xiamen New Trend Trading Co., Ltd. Seller Ali Id 2212173602706	VA0002379888	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
340	Xiamen Ningning Qi E-Commerce Co., Ltd. Seller Ali Id 2210671116745	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
342	Xiamen Pop Gloria International Trade Co., Ltd Seller Ali Id 2209813614863	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
343	Xiamen Qinchang Apparel Co., Ltd. Seller Ali Id 2212443864672	VA0002380492 VA0002380491	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
344	Xiamen Simian E-Business Co., Ltd. Seller Ali Id 2207263006037	VA0002380492 VA0002379888	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
345	Xiamen Sipaisi Trading Co., Ltd Seller Ali Id 2206696618314	VA0002380492 VA0002379881	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
346	Xiamen Sky Pigeon Network Technology Co., Ltd. Seller Ali Id 2211526752563	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
348	Xiamen Starlights Supply Chain Co., Ltd. Seller Ali Id 2212322829534 Seller Ali Id 2211931776541	VA0002379894 VA0002379881 VA0002379888	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
350	Xiamen Tongsiyuan Trading Co., Ltd. Seller Ali Id 3190971340	VA0002379904 VA0002379881 VA0002380492 VA0002379895 VA0002379888 VA0002379911 VA0002380491 VA0002369378 VA0002379899 VA0002381160 VA0002381161 VA0002381162 3D Image	<b>\$5,000.00 x10</b>	<b>Total: \$150,000.00</b>
351	Xiamen Unique Pretty Textile Clothing Co.,Ltd Seller Ali Id 2208579719880	VA0002379911	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
352	Xiamen Weimiduo Industrial Co., Ltd. Seller Ali Id 2214687076851	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
353	Xiamen Xinyi Import And Export Co., Ltd. Seller Ali Id 2200593916217	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
354	Xiamen Yangfan Trading Co., Ltd Seller Ali Id 2207940646469	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
355	Xiamen Yingleihong Electronic Commerce Co., Ltd. Seller Ali Id 2211847070144	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
356	Xingcheng Besali Sporting Goods Co., Ltd. Seller Ali Id 2216094260462	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
357	Xinxiang Jues Department Store Co., Ltd Seller Ali Id 2216767807608	VA0002379881 VA0002380492 VA0002379911 VA0002379893 VA0002381204 VA0002381206 VA0002381209 3D Image	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
358	Xingcheng Dongshengda Garment Co., Ltd. Seller Ali Id 2212997787605	VA0002379888	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
359	Xinxiang Shiyuan Trading Co., Ltd. Seller Ali Id 2212402129976	VA0002379888 VA0002380492 VA0002379894	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
360	Xinxing County Adana Clothing Co., Ltd Seller Ali Id 2216303922219	VA0002379897 VA0002379904 VA0002379894 VA0002379895 VA0002379888	<b>\$5,000.00 x5</b>	<b>Total: \$75,000.00</b>
361	Yamon (hangzhou) International Trade Co., Ltd Seller Ali Id 2215872833338	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
362	Yiwu Beiwo Trading Co., Ltd. Seller Ali Id 2200779387617	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
363	Yiwu Changjie Trading Co., Ltd. Seller Ali Id 3974296537	VA0002379881 VA0002380492 VA0002379888 VA0002379893 VA0002381160 VA0002381161 VA0002381162 3D Image	<b>\$5,000.00 x5</b>	<b>Total: \$75,000.00</b>
364	Yiwu Chenxia E-Commerce Firm Seller Ali Id 2212317234783	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
365	Yiwu Chenyan Jewelry Co., Ltd Seller Ali Id 2206929075518	VA0002379881 VA0002380492	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
367	Yiwu City Chenhao Trading Co., Ltd. Seller Ali Id 2209037470425	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
368	Yiwu City Domy Garment Co., Ltd. Seller Ali Id 2207667935516	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
369	Yiwu Dajie Import And Export Co., Ltd. Seller Ali Id 2206887864844	VA0002379904 VA0002379881 VA0002380492 VA0002379893  VA0002381160 VA0002381161 VA0002381162 3D Image	<b>\$5,000.00 x5</b>	<b>Total: \$75,000.00</b>
370	Yiwu Dingxin E-Commerce Co.,Ltd. Seller Ali Id 2209090238626	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
371	Yiwu Duoni Import And Export Co., Ltd Seller Ali Id 2213867887927	VA0002379894 VA0002379895	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
373	Yiwu Fengyao Garment Co., Ltd. Seller Ali Id 2202442347462	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
377	Yiwu Huiyu E-Commerce Firm Seller Ali Id 2214752576982	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
378	Yiwu Kaiding Electronic Commerce Co., Ltd. Seller Ali Id 3252961031	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
379	Yiwu Kejia Import And Export Co., Ltd. Seller Ali Id 3855388557	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
380	Yiwu Lizhiyi Apparel Co., Ltd. Seller Ali Id 2207478761168	VA0002379893 VA0002379888	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
383	Yiwu Maining Trading Co., Ltd. Seller Ali Id 2206935940787	VA0002379881 VA0002380491 VA0002379895 VA0002379904	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>
385	Yiwu Mingqi Trading Co., Ltd. Seller Ali Id 2216044431278	VA0002379888	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
387	Yiwu Motty Garment Co., Ltd. Seller Ali Id 3475945833	VA0002379881 VA0002380492 VA0002379894 VA0002379904	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
388	Yiwu Mozi Trade Company Limited Seller Ali Id 2211135522110	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
389	Yiwu Nuoyi Imp & Exp Co., Ltd Seller Ali Id 2200739518350	VA0002379897	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
390	Yiwu Om Import And Export Co., Ltd. Seller Ali Id 4229765300	VA0002379888	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
391	Yiwu Orange Sui Import And Export Company Limited Seller Ali Id 2215270892140	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
393	Yiwu Pengrun Apparel Co., Ltd Seller Ali Id 2211604592499	VA0002381115 VA0002381116 VA0002381117	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
394	Yiwu Qiji Trading Co., Ltd Seller Ali Id 3916051240	VA0002379911	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
396	Yiwu S&y Trading Co., Ltd. Seller Ali Id 2206598342837	VA0002379911 VA0002380492 VA0002379907 VA0002379893 VA0002379899	<b>\$5,000.00 x5</b>	<b>Total: \$75,000.00</b>
397	Yiwu Saichen Import And Export Co., Ltd. Seller Ali Id 3875251428	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
398	Yiwu Sangor Import And Export Co., Ltd. Seller Ali Id 1939223129	VA0002379893	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
399	Yiwu Sangtu Import And Export Co., Ltd. Seller Ali Id 2209329454036	VA0002379881 VA0002379895 VA0002379888 VA0002379904	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>
401	Yiwu Tixu E-Business Firm Seller Ali Id 2211489188430	VA0002379881	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
402	Yiwu Wenshuo Import And Export Co., Ltd Seller Ali Id 17380927018	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
403	Yiwu Xiangjia Clothing Co., Ltd. Seller Ali Id 2215853920139	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
404	Yiwu Xiaokan Electronic Commerce Firm Seller Ali Id 2210371740878	VA0002379881 VA0002380492 VA0002379894 VA0002379904	<b>\$5,000.00 x4</b>	<b>Total: \$60,000.00</b>
406	Yiwu Xinxin Import And Export Co., Ltd. Seller Ali Id 2211436169271	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
407	Yiwu Xinyu Garment Co., Ltd Seller Ali Id 2212409639314	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
408	Yiwu Xuanxin Trading Co., Ltd. Seller Ali Id 2208140663917	VA0002380492 VA0002379894 VA0002379881	<b>\$5,000.00 x3</b>	<b>Total: \$45,000.00</b>
410	Yiwu Yayan Trading Co., Ltd. Seller Ali Id 2213852759750	VA0002380492	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
411	Yiwu Yili Trading Firm Seller Ali Id 2215695134648	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
412	Yiwu Yinglei Trading Co., Ltd. Seller Ali Id 2211622037162	VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
413	Yiwu Yinpeng Healthy&Sport Article Co., Ltd. Seller Ali Id 3074768858	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
415	Yiwu Youlike Electronic Commerce Co., Ltd. Seller Ali Id 2209584376196	VA0002381115 VA0002381116 VA0002381117	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
416	Yuanhong Garment Accessory Co., Ltd. Seller Ali Id 17179896634	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
417	Yuanyang County Hengsen Department Store Co., Ltd. Seller Ali Id 2208453073440	VA0002379904	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
419	Zhangzhou Daimeng Clothing Co., Ltd. Seller Ali Id 2212771469326	VA0002379893 VA0002379894	<b>\$5,000.00 x2</b>	<b>Total: \$30,000.00</b>
421	Zhejiang Bsofter Textile Co., Ltd Seller Ali Id 2212541981855	VA0002369378	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>

**296 Defaulted Defendants Infringements - 1807**

<b>No</b>	<b>Name</b>	<b>Infringement</b>	<b>Amount Requested for Each Infringement</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
422	Zhejiang G Top Clothing Co., Ltd. Seller Ali Id 2210878167080	VA0002379894	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
423	Zhengzhou Senyo Trading Co., Ltd. Seller Ali Id 2212400503128	VA0002380492 VA0002379895	<b>\$5,000.00</b>	<b>Total: \$15,000.00</b>
			<b>Total</b>	<b>7,395,000.00</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-01807-VMK-GAF**

**Honorable Virginia M. Kendall  
Magistrate Gabriel A. Fuentes**

Hearing Date: November 26, 2024

Hearing Time: 9:30 AM CT

Courtroom: 2541

**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, Temu, Walmart, eBay, Aliexpress, and Alibaba (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.

6. Plaintiff seeks an award of actual damages and profits made by all defaulted Schedule "A" Defendants (the "Defaulted Defendants") in this action. The Defaulted Defendants are accused of intentionally and willfully infringing Plaintiff's following thirty-three (33) federally registered copyrights asserted in this action:

- (1) VA0002369378      (2) VA0002381204      (3) VA0002381206      4) VA0002381125
- (5) VA0002381126      (6) VA0002381127      (7) VA0002381142      (8) VA0002381156
- (9) VA0002381160      (10) VA0002381161      (11) VA0002381162      (12) VA0002381097
- (13) VA0002381101      (14) VA0002381109      (15) VA0002381110      (16) VA0002381111
- (17) VA0002381115      (18) VA0002381116      (19) VA0002381117      (20) VA0002379888
- (21) VA0002379893      (22) VA0002379895      (23) VA0002379894      (24) VA0002379907
- (25) VA0002379904      (26) VA0002379881      (27) VA0002379911      (28) VA0002380492
- (29) VA0002380491      (30) VA0002379930      (31) VA0002379897      (32) VA0002379895
- (33) VA0002379934      (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 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.

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 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.

10. 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.

11. 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 Alibaba.com search engine optimization. Doing so causes their online stores to be displayed whenever someone searches for "Rotita" on Alibaba.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.

12. 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 the Defaulted Defendants' Platform storefronts.

13. 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 November 20, 2024, in Hong Kong.

By: Liangjie Li  
LIANGJIE LI

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20th day of November 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email and by posting the filing on a URL contained on our website <https://blointernetenforcement.com/>, and distributed to ecommerce platform, Alibaba.

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (ARDC 6299408)  
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