

**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-07262-JIC-JC**

**Honorable Judge Jeffrey I Cummings**

**Magistrate Jeffrey Cole**

**MOTION FOR ENTRY OF DEFAULT JUDGMENT  
AGAINST THE SEVEN REMAINING 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 remaining identified seven (7) Schedule “A” Defendants (the “Defaulted Defendants”), which have been separately listed in Exhibit “1” to the accompanying Declaration of Katherine M. Kuhn, Esq. (the “Kuhn Decl.”). Plaintiff’s Motion is made and based upon the supporting Memorandum of Law, the Kuhn 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. Plaintiff also has a second pending motion for Default Judgment pending in this case [Dkt. No. 40]. This Motion along with Docket 40, if granted, would dispose of all remaining Defendants.

DATED: May 2, 2025

Respectfully submitted,

By: /s/ Joseph W. Droter

Joseph W. Droter (IL Bar No. 6329630)

**BAYRAMOGLU LAW OFFICES LLC**

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of May 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, Temu.

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

No.	Seller's Name	Seller's Contact
10	Bellycurve Mall ID: 4866191543952	1964586221@qq.com
11	BFER Mall ID: 634418210647619	372703624@qq.com
15	Curvy Mall ID: 146281689671	1964586221@qq.com
20	FOX CLAW PLUS Mall ID: 634418211480954	52157740@qq.com
33	MGclothing Mall ID: 634418211375899	190897677@qq.com
35	Monique Clothing Mall ID: 273121935835	3203276788@qq.com
50	Yashengyi Mall ID: 3039426956131	1260155020@qq.com

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SCHEDULE “A” HERETO,

Defendants.

**Case No. 1:24-cv-07262-JIC-JC**

**Honorable Judge Jeffrey I Cummings**

**Magistrate Jeffrey Cole**

**PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR ENTRY OF  
DEFAULT JUDGMENT AGAINST THE SEVEN 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 seven (7) remaining Schedule “A” Defendants (the “Defaulted Defendants”), which have been separately listed in Exhibit “1” to the accompanying Declaration of Katherine M. Kuhn (the “Kuhn Decl.”). Plaintiff’s Motion is made and based upon this Memorandum of Law, the Kuhn 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. Plaintiff also has a second pending motion for Default Judgment pending in this case [Dkt. No. 40]. This Motion along with Docket 40, if granted, would dispose of all remaining Defendants.

**I. INTRODUCTION**

On February 14, 2025, the Court granted Plaintiff’s Motion for Entry of Clerk’s Default against the Defaulted Defendants. [Dkt. No. 38.] Pursuant to Rule 55(b)(2), Plaintiff now respectfully moves this Court for entry of a default judgment finding the Defaulted Defendants liable on all counts asserted in Plaintiff’s First Amended Complaint. [Dkt. No. 11.] These asserted counts include claims for Copyright Infringement (Count I), and violation of the Illinois Uniform Deceptive Trade Practices Act (the “Uniform Deceptive Trade Practices Act”) (Count III). [Dkt. No. 11 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 federally registered copyright asserted in this action: (1) VA0002379897 (the “Copyright Protected Images”). (Kuhn 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 Temu.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. (Kuhn 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. (Kuhn 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 February 14, 2025, the Court granted Plaintiff's Motion for Entry of Clerk's Default. [Dkt. No. 38.] 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 listed Defaulted Defendants' liability for Plaintiff's asserted claims for relief against them. *See Fed.R.Civ.P. 55(b)(2)*.

Specifically, Plaintiff's Motion seeks entry of a default judgment against the Defaulted Defendants determining them liable for Copyright Infringement (Count I), and violation of the

Uniform Deceptive Trade Practices Act (Count III) as asserted in the company's Complaint. [Dkt. No. 11 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 February 14, 2025, the Court granted Plaintiff's Motion for Entry of Clerk's Default against the Defaulted Defendants. [Dkt. No. 38.] 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. 11 at 8-13.]

As argued below, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the listed seven (7) 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. 38], 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. 11 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. (Kuhn 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. 11 at 9] and has supplied the Court with a summary of all registrations issued by the United States Copyright Office [Dkt. No. 11, Ex. 1]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulted Defendants have infringed the company's Copyright Protected Images. [Dkt. Nos. 11 at 15-34, 19-2, 22.] Accordingly, Plaintiff has established that the Defaulted Defendants have infringed the company's Copyright Protected Images.

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

Plaintiff has established unquestionably viable copyright infringement claims in this case. Most notably, Plaintiff secured entry of a preliminary injunction in this case. [Dkt. No. 29.] This ruling is consistent with Judge Kennelly's issuance of preliminary injunctive relief in Plaintiff's favor against defendants engaged in identical acts of intentional copyright infringement on the same Platform in what he considered to be one of the most contested Schedule "A" cases he had encountered in recent memory. (Kuhn 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. (Kuhn Decl. ¶ 7.) Moreover, while Plaintiff can estimate the range of the Defaulted Defendants’ net profits from their infringing sales through infringing units sold and the listed price per unit, this estimate is highly speculative and cannot affirmatively account for the advertising expenses saved through the unauthorized use and display of the company’s Copyright Protected Images for which is has created at considerable expense. (Li Decl. ¶ 11.) Accordingly, an award of statutory damages is appropriate because actual damages are “virtually impossible to prove . . .” in this case. *See White*, 771 F.Supp.2d at 956.

Given the foregoing circumstances, and the nature of the Defaulted Defendants’ conduct, Plaintiff asserts that it is entitled to an individualized assessment award of statutory damages per Defaulted Defendant per infringed Copyright Protected Image in this action. (Kuhn Decl. ¶ 10, 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. 38.] 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. (Kuhn 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 individualized request for 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. (Kuhn 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 individualized 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 statutory damages because of their infringements of the Copyright Protected Images. (Kuhn Decl. ¶ 10, 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 ranging from \$5,000 to \$30,000 per Defaulted Defendant per infringed Copyright Protected Image. (Kuhn 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. (Kuhn 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. (Kuhn 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). (Kuhn 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. (Kuhn 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. (Kuhn 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 per Defaulted Defendant per infringed Copyright Protected Work as assessed in Exhibit 1 to the Kuhn Declaration. As set forth in Plaintiff's supporting documentation, the Defaulted Defendants in this action should be found liable for treble enhanced statutory damages each because of their willful infringement for each of the Copyright Protected Images. (Kuhn Decl. ¶ 12, Ex. 1) Accordingly, Plaintiff respectfully requests the Court enter an award of statutory damages per Defaulted Defendant per infringed Copyright Protected Image, which should be enhanced for willful infringement 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. 29.] 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. 38.] As such, Plaintiff's right to permanent injunctive relief under 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3, is uncontested and supported by the substantial evidentiary

record previously provided to the Court when preliminary injunctive relief was issued. Accordingly, Plaintiff is entitled to issuance of permanent injunctive relief against the Defaulted Defendants.

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

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

Plaintiff's request for an award of attorneys' fees and costs is two-fold. First, such an award is warranted based on issuance of enhanced statutory damages based on the Defaulted Defendants' willful infringement of the company's Copyright Protected Images. *See* 17 U.S.C. § 505. Second, and alternatively, Plaintiff is entitled to an award of attorneys' fees and costs based on the Defaulted Defendants' willful violation of the Uniform Deceptive Trade Practices Act. *See* 815 ILCS § 510/3. Under either statutory provision, the facts presented clearly justify the willful infringement and violation of Plaintiff's federally secured rights in and to the Copyright Protected Images, which have been done to deceive the consuming public. (Kuhn 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 per each Defaulted Defendant per infringed Copyright Protected Image pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced statutory damages 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: May 2, 2025,

respectfully submitted,

By: /s/ Joseph W. Droter

Joseph W. Droter (IL Bar No. 6329630)

**BAYRAMOGLU LAW OFFICES LLC**

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of May 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, Temu.

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

<b>No.</b>	<b>Seller's Name</b>	<b>Seller's Contact</b>
10	Bellycurve Mall ID: 4866191543952	1964586221@qq.com
11	BFER Mall ID: 634418210647619	372703624@qq.com
15	Curvy Mall ID: 146281689671	1964586221@qq.com
20	FOX CLAW PLUS Mall ID: 634418211480954	52157740@qq.com
33	MGclothing Mall ID: 634418211375899	190897677@qq.com
35	Monique Clothing Mall ID: 273121935835	3203276788@qq.com
50	Yashengyi Mall ID: 3039426956131	1260155020@qq.com

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED IN  
SCHEDULE “A” HERETO,

Defendants.

**Case No. 1:24-cv-07262-JIC-JC**

**Honorable Judge Jeffrey I Cummings**

**Magistrate Jeffrey Cole**

**DECLARATION OF KATHERINE M. KUHN IN SUPPORT OF  
MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST THE SEVEN  
REMAINING DEFAULTED SCHEDULE “A” DEFENDANTS**

I, Katherine M. Kuhn, of the City of Chicago, in the State of Illinois, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff’s Motion for Default Judgment against the seven (7) remaining non-appearing Defendants Identified in Schedule “A” (the “Motion”) against which the Court has previously granted Entry of Clerk’s Default on February 14, 2025 [Dkt. No. 38] 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 one of the Attorney’s 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 February 14, 2025 against the Defaulted Defendants. [Dkt. No. 38.] Accordingly, the Defaulted Defendants are deemed liable to Plaintiff for its asserted claims for relief for Copyright Infringement (Count I), 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 federally registered copyright protected images: (1) VA0002379897 (the "Copyright Protected Images").

6. As alleged in the Complaint, the Defaulted Defendants have displayed, without authorization, the Copyright Protected Images on the temu.com online sales platform (the "Platform") to market and sell knockoff, 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 statutory damage award per Defaulted Defendant per infringed Copyright Protected Image in this action. Attached hereto as **Exhibit 1** is a chart listing all Defaulted Defendants, the infringed Copyright Protected Image, the statutory damage amount requested per infringement, and the amount requested based on the Defaulted Defendant's willful infringement sales. 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. 38.] 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. Attached as **Exhibit 2** is the Schedule A demonstrating the current status of each Defendant in this action showing the Defendants who have resolved claims with Plaintiff or chosen to not respond. Simply put, the Defaulted Defendants are watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district.

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

relief in its case pending before Judge Kennelly, the named Schedule “A” defendants in other pending actions have either elected to settle or, as with the Defaulted Defendants, simply failed to appear and have apparently taken the position that any recovery issued by a court is only executable against their restrained asserts on the named online platform.

10. To maximize the deterrent effect of the Court’s anticipated default judgment, Plaintiff is asking that statutory damages be imposed on each individual Defaulted Defendant for each alleged infringement of the Copyright Protected Images. Such an award precludes the Defaulted Defendants from shielding themselves from monetary responsibility for the collective infringement of common Copyright Protected Images. *Desire, LLC v. Manna Textiles, Inc.*, 986 F.3d 1253, 1264-1272 (9th Cir. 2021). Rather, Plaintiff expressly requests that each of the Defaulted Defendants, individually, be individually assessed a statutory damage award as listed in **Exhibit 1** to this declaration 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 individually assessed statutory damages per Defaulted Defendant with treble the

enhancement per Defaulted Defendant as listed in **Exhibit 1** based on their willful infringement of the Copyright Protected Images.

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: May 2, 2025

By: /s/ Katherine M. Kuhn  
Katherine M. Kuhn, Esq. (Bar No. 6331405)  
**BAYRAMOGLU LAW OFFICES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of May 2025, 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, Temu.

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

<b>No.</b>	<b>Seller's Name</b>	<b>Seller's Contact</b>
10	Bellycurve Mall ID: 4866191543952	1964586221@qq.com
11	BFER Mall ID: 634418210647619	372703624@qq.com
15	Curvy Mall ID: 146281689671	1964586221@qq.com
20	FOX CLAW PLUS Mall ID: 634418211480954	52157740@qq.com
33	MGclothing Mall ID: 634418211375899	190897677@qq.com
35	Monique Clothing Mall ID: 273121935835	3203276788@qq.com
50	Yashengyi Mall ID: 3039426956131	1260155020@qq.com

# Exhibit 1

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

**Default Judgment Infringement Analysis**

No.	Name	Infringement	Units sold Provided by Temu Platform x Average Sales Prices = (\$) Infringing Sales	Amount Requested for Each Infringement	Enhanced x3 for Willful Infringement Total Requested
10	Bellycurve Mall ID: 4866191543952	VA0002379897	10,248 x \$13.48 = <b>\$138,143.00</b>	\$30,000	<b>Total: \$90,000.00</b>
11	BFER Mall ID: 634418210647619	VA0002379897	9,847 x \$10.99 = <b>\$108,218</b>	\$30,000	<b>Total: \$90,000.00</b>
15	Curvy Mall ID: 146281689671	VA0002379897	7,342 x \$9.78 = <b>\$71,804.76</b>	\$30,000	<b>Total: \$90,000.00</b>
20	FOX CLAW PLUS Mall ID: 634418211480954	VA0002379897	1,467 x \$14.79 = <b>\$21,696.93</b>	\$21,000	<b>Total: \$63,000.00</b>
33	MGclothing Mall ID: 634418211375899	VA0002379897	135 x \$24.48 = <b>\$3,304.80</b>	\$5,000	<b>Total: \$15,000.00</b>
35	Monique Clothing Mall ID: 273121935835	VA0002379897	151 x \$11.99 = <b>\$1,810.49</b>	\$5,000	<b>Total: \$15,000.00</b>
50	Yashengyi Mall ID: 3039426956131	VA0002379897	5,238 x \$10.29 = <b>\$53,899.02</b>	\$30,000	<b>Total: \$90,000.00</b>
<b>TOTAL:</b>					<b>\$453,000.00</b>

# Exhibit 2

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A  
**Schedule A 1:25-cv-07262**

<b>Defendant No.</b>	<b>Seller's Name</b>	<b>Link to Seller's Website</b>
1	AY Beautyfashion	DISMISSED Docket 35 1/15/2025
2	LovelyWholesale Edgy	DISMISSED Docket 34 1/1/2025
3	PiekPink Swimwear	DISMISSED Docket 37 2/2/2025
4	Plus Plus	DISMISSED Docket 47 4/15/2025
5	XHP	DISMISSED Docket 34 1/1/2025
6	ABILITYFASHION	DISMISSED Docket 30 12/1/2024
7	An inch of light	DEFAULT JUDGMENT DOCKET 40 2/18/2025
8	Anneyep	DEFAULT JUDGMENT DOCKET 40 2/18/2025
9	ASJPStyle	DEFAULT JUDGMENT DOCKET 40 2/18/2025
10	Bellycurve Mall ID: 4866191543952	DEFAULT JUDGMENT DOCKET 50 5/2/2025
11	BFER Mall ID: 634418210647619	DEFAULT JUDGMENT DOCKET 50 5/2/2025
12	by one	DEFAULT JUDGMENT DOCKET 40 2/18/2025
13	CBS	DISMISSED Docket 34 1/1/2025
14	CCFF	DEFAULT JUDGMENT DOCKET 40 2/18/2025
15	Curvy Mall ID: 146281689671	DEFAULT JUDGMENT DOCKET 50 5/2/2025
16	DANGIEN	DEFAULT JUDGMENT DOCKET 40 2/18/2025
17	Different years	DISMISSED Docket 34 1/1/2025
18	DNEATER SWIMSUIT	DEFAULT JUDGMENT DOCKET 40 2/18/2025
19	DTA	DEFAULT JUDGMENT DOCKET 40 2/18/2025
20	FOX CLAW PLUS Mall ID: 634418211480954	DEFAULT JUDGMENT DOCKET 50 5/2/2025
21	GOG	DISMISSED Docket 30 12/1/2024
22	GSB	DISMISSED Docket 30 12/1/2024
23	heavensent	DEFAULT JUDGMENT DOCKET 40 2/18/2025
24	HONGHONGXI	DISMISSED Docket 34 1/1/2025
25	Hui shangying clothing	DEFAULT JUDGMENT DOCKET 40 2/18/2025
26	Huludao Sai Rui Er Garment Tra	DEFAULT JUDGMENT DOCKET 40 2/18/2025
27	JIANMUQIYI	DISMISSED Docket 34 1/1/2025
28	LINGDALIN	DEFAULT JUDGMENT DOCKET 40 2/18/2025
29	LO TIN	DISMISSED Docket 32 12/15/2024
30	LUO YU JING	DEFAULT JUDGMENT DOCKET 40 2/18/2025
31	Maya fashion	DEFAULT JUDGMENT DOCKET 40 2/18/2025
32	M Born to Shop	DISMISSED Docket 34 1/1/2025
33	MGclothing Mall ID: 634418211375899	DEFAULT JUDGMENT DOCKET 50 5/2/2025
34	Mini fox ladies	DISMISSED Docket 49 5/1/2025
35	Monique Clothing Mall ID: 273121935835	DEFAULT JUDGMENT DOCKET 50 5/2/2025
36	Mymermaid	DEFAULT JUDGMENT DOCKET 40 2/18/2025

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

**Schedule A 1:25-cv-07262**

<b>Defendant No.</b>	<b>Seller's Name</b>	<b>Link to Seller's Website</b>
37	<del>Olanyi Clothing</del>	DISMISSED Docket 32 12/15/2024
38	PLUSWIM	DEFAULT JUDGMENT DOCKET 40 2/18/2025
39	Qixi boutique clothing	DEFAULT JUDGMENT DOCKET 40 2/18/2025
40	qlqlql	DEFAULT JUDGMENT DOCKET 40 2/18/2025
41	QMswimwear	DEFAULT JUDGMENT DOCKET 40 2/18/2025
42	SHINUOYA	DISMISSED Docket 32 12/15/2024
43	SYswimsuit	DISMISSED Docket 39 2/17/2025
44	Tigers	DEFAULT JUDGMENT DOCKET 40 2/18/2025
45	<del>Univer</del> swimwear	DISMISSED Docket 34 1/1/2025
46	VIVI Fashion Style	DEFAULT JUDGMENT DOCKET 40 2/18/2025
47	weinimeigongsi	DEFAULT JUDGMENT DOCKET 40 2/18/2025
48	WZQBBC	DEFAULT JUDGMENT DOCKET 40 2/18/2025
49	<del>XWD girl new</del>	DISMISSED Docket 45 3/17/2025
50	Yashengyi Mall ID: 3039426956131	DEFAULT JUDGMENT DOCKET 50 5/2/2025
51	YHdress	DEFAULT JUDGMENT DOCKET 40 2/18/2025

**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-07262-JIC-JC**

**Honorable Judge Jeffrey I Cummings**

**Magistrate Jeffrey Cole**

**DECLARATION OF LIANGJIE LI**  
**IN SUPPORT OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST**  
**THE SEVEN REMAINING DEFAULTED SCHEDULE "A" DEFENDANTS**

I, Liangjie Li, of Hong Kong, a special administrative region of the People's Republic of China, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Motion for Default Judgment (the "Motion").

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

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

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

6. Plaintiff seeks an award of statutory damages against all defaulted Schedule "A" Defendants (the "Defaulted Defendants") in this action. The Defaulted Defendants are accused of intentionally and willfully infringing Plaintiff's following federally registered copyright asserted in this action: (1) VA0002379897 (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 Katie M. Kuhn's, 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 Temu.com search engine optimization. Doing so causes their online stores to be displayed whenever someone searches for "Rotita" on Temu.com despite Plaintiff not selling authentic "Rotita" brand products on the platform. Based on the foregoing, I would estimate that the Defaulted Defendants' Online Stores operate at a net profit of between 40% to 50%. I believe that a disgorgement of the Defaulted Defendants' profits would fall within the net profit range. However, it is impossible to definitively calculate the Defaulted Defendants' total sales on the Platform through their Online Stores or to ascertain their expenses related to their infringing sales because they have failed to appear, defend, or otherwise participate in this action.

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 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 May 2, 2025, in Hong Kong.

By: /s/ Liangjie Li  
LIANGJIE LI

**CERTIFICATE OF SERVICE**

I hereby certify that on the 2nd day of May 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, Temu.

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

No.	Seller's Name	Seller's Contact
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33	MGelothing Mall ID: 634418211375899	190897677@qq.com
35	Monique Clothing Mall ID: 273121935835	3203276788@qq.com
50	Yashengyi Mall ID: 3039426956131	1260155020@qq.com