

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 1:25-cv-22032-ALTONAGA/Reid

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUAL, CORPORATION,
LIMITED LIABILITY COMPANY,
PARTNERSHIP, AND/OR
UNINCORPORATED ASSOCIATION
IDENTIFIED IN SCHEDULE "A,"

Defendant.

**PLAINTIFF'S VERIFIED BY COUNSEL MOTION FOR
ENTRY OF CLERK'S DEFAULT AGAINST DEFENDANT**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff") hereby moves for the Entry of Clerk's Default against the Defendant Buy 3 Get 1 Free Clearance Sale Shop a/k/a Buy 3 Get 1 Free-Early Black Friday Deals 2024 ("Defendant"), as the Defaulting Defendant has failed to appear or otherwise respond to the Complaint within the time specified by the Federal Rules of Civil Procedure.

On June 24, 2025, the Court authorized electronic service via email on the Defendant [Dkt. No. 28]. On July 16, 2025, the Defendant was served with their respective Summons and copies of the Complaint and Temporary Restraining Order through electronic mail ("e-mail") to the email addresses provided by the online marketplace Amazon.com as authorized by this Court. (D.E. 41 Return of Service on file with the Court.)

Subsequently, the Court noted that the Plaintiff failed to include evidence that service was also performed by posting to the website and by emailing the link to the Defendant [D.E. 43].

The link in question was in the July 16th email and directed the Defendant to OneDrive, which is a website, while the Plaintiff put the documents on a more permanent website, and then subsequently served the link to the more permanent website by email. [D.E. 45].

The Defendant had access to the documents, received them through email, and could access all relevant documents via a weblink in the original July 16, 2025, email. Therefore, Defendant was served on July 16, 2025, the deadline to respond to the Amended Complaint and Jury Demand (the “Amended Complaint”) [D.E. 39] was August 6, 2025.

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), the Defaulting Defendant had twenty-one (21) days to answer or respond to the Complaint. As of the filing of this Motion, approximately twenty-two days (22) have passed since electronic service was completed on the Defendant, and to date, Defendant has not responded to the Amended Complaint.

WHEREFORE, Plaintiff requests that default be entered against the Defaulting Defendant, Buy 3 Get 1 Free Clearance Sale Shop a/k/a Buy 3 Get 1 Free-Early Black Friday Deals 2024.

DATED: August 7, 2025

Respectfully submitted,

/s/ Joshua H. Sheskin

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Counsel for Plaintiff

VERIFICATION OF FACTS IN MOTION BY COUNSEL

I, Joshua H. Sheskin, hereby verify on this 7th Day of August 2025, in the State of Pennsylvania, in the City of Mount Lebanon, that the facts in the above motion are correct and accurate, and that the entry of default is proper.

/s/ Joshua H. Sheskin

Joshua H. Sheskin (FL Bar No. 93028)

BAYRAMOGLU LAW OFFICES LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 7th day of August 2025, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to Defendant via email sent to the address provided by Amazon in response to the TRO. Further, this email to Defendants contains a link to the posting of the filing on a URL contained on our website <http://blointernetenforcement.com>.

/s/ Joshua H. Sheskin

Joshua H. Sheskin (FL Bar No. 93028)

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Defendant.

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR ENTRY
OF CLERK'S DEFAULT AGAINST CERTAIN DEFENDANTS**

Before the Court is Plaintiff Hong Kong Leyuzhen Technology Co. Limited's motion for entry of clerk's default against Defendant under Federal Rule of Civil Procedure 55(a) for not appearing, through the filing of an answer or otherwise responsive pleading.

Finding good cause, the Court hereby **GRANTS** Plaintiff's Motion and directs the Clerk to enter default against the Defaulting Defendant.

IT IS SO ORDERED.

DATED: _____

HONORABLE CECILIA M. ALTONAGA
UNITED STATES DISTRICT CHIEF JUDGE