

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

Case No.: 1:25-cv-22093-MD

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED IN
SCHEDULE "A,"

Defendants,

**PLAINTIFF'S MOTION FOR ENTRY OF CLERK'S DEFAULT
AGAINST CERTAIN DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff"), hereby moves for Entry of Clerk's Default against certain Defendants identified in Schedule "A" to the complaint (collectively, the "Defaulting Defendants"). The Defaulting Defendants¹ are separately listed in **Exhibit 1** to the accompanying Declaration of Willam Brees (the "Brees Decl."). Plaintiff makes this motion on the ground that the Defaulting Defendants have failed to appear or otherwise respond to the Complaint within the time prescribed by Federal Rules of Civil Procedure.

On November 4, 2025, the Court authorized electronic service via email on Defendants listed in Schedule "A" in connection with the Temporary Restraining Order ("TRO") [Dkt. No. 22]. On November 25, 2025, Defendants were served with their respective Summons and copies of the Complaint and Temporary Restraining Order via electronic mail ("e-mail") to the email addresses provided by the online marketplace Amazon.com response to request for expedited

¹ Plaintiff does not seek entry of Default against Defendant Nos. 7 RioJy and 13 HYC-Store.

discovery as permitted by the TRO and via website posting pursuant to the Court's Order authorizing alternate service of process. (Brees Decl. ¶ 3; see Dkt. No. 26 Return of Service on file with the Court). The deadline to respond to the Complaint and Jury Demand (the "Complaint") [Dkt. No.1] was December 16, 2025. Brees Decl. ¶ 4.

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), the Defaulting Defendants had twenty-one (21) days to answer or otherwise respond to Plaintiff's Complaint in this action. As of the filing of this Motion, approximately thirty-one (31) days have expired since electronic service was effectuated on the Schedule "A" Defendants, which includes the Defaulting Defendants that are the subject of Plaintiff's Motion. Brees Decl. ¶ 8. To date, none of the Defaulting Defendants have answered or otherwise responded to Plaintiff's Complaint. *Id.* at ¶ 9.

WHEREFORE, Plaintiff request that default be entered against the Defaulting Defendants, Schedule "A" Defendant Nos. 1-6, 8-28.

DATED: December 26, 2025

Respectfully submitted,

/s/ William R. Brees
William R. Brees (FL Bar No. 98886)
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BAYRAMOGLU LAW OFFICES LLC
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Henderson, NV 89014
Tel: (702) 462 – 5973

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of December 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, Amazon.

/s/ William R. Brees
William R. Brees (FL Bar No. 98886)
BAYRAMOGLU LAW OFFICES LLC

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THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED IN
SCHEDULE "A,"

Defendants,

**DECLARATION OF WILLIAM R. BREES, ESQ. IN SUPPORT OF PLAINTIFF'S MOTION
FOR ENTRY OF CLERK'S DEFAULT AGAINST CERTAIN DEFENDANTS**

I, William R. Brees, Esq., of St. Petersburg, Florida, declare as follows:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff, Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff") in the above-captioned matter. I make this Declaration, which is filed in support of Plaintiff's Motion for Entry of Clerk's Default Against Certain Defendants, and I could and would testify competently to the matters set forth herein.

2. On May 6, 2025, Plaintiff filed its Complaint and Jury Demand (the "Complaint") [Dkt. No. 1] against Defendants, the Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations identified on Schedule "A" [Dkt. No. 1-2, 17-2] (collectively, "Defendants").

3. On November 25, 2025, Defendants were served with the Summons and copies of the Complaint and Temporary Restraining Order via electronic mail ("e-mail") and via website

posting pursuant to the Court's Order authorizing alternate service of process. (See Dkt. No. 26 Return of Service on file with the Court.)

4. The deadline to respond to the Complaint was December 16, 2025.
5. Defendant No. 7 RioJy has been Dismissed from this case. [Dkt. No. 34].
6. The remaining Defendants to whom the Motion for Entry of Clerk's Default applies are Defendant Nos. 1-6, 8-28 (collectively the "Defaulting Defendants").
7. The Defaulting Defendants have not been granted an extension of time to respond to the Complaint.
8. As of the filing of this Motion, approximately thirty-one days (31) have expired since electronic service was effectuated on the Schedule "A" Defendants.
9. The Defaulting Defendants have failed to answer or otherwise respond to the Complaint or serve a copy of the Answer or other response upon Plaintiff's attorneys of record. A list of the Defaulting Defendants is attached hereto as **Exhibit 1**.

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

Executed on December 26, 2025, in St. Petersburg, Florida.

By: /s/ William R. Brees
WILLIAM R. BRES (FL BAR NO. 98886)

EXHIBIT 1

Defendant No.	Seller's Name	Link to Seller's Website
1	Prime Day Deals 2024 Warehouse Clearance	https://www.amazon.com/sp?ie=UTF8&seller=A2TR65FOR6UPEQ&asin=B0CX9CK9JV&ref_=dp_merchant_link
2	QINHONGCHUAN	https://www.amazon.com/sp?ie=UTF8&seller=AKV9FVC25USDG&asin=B09YQ8ZC77&ref_=dp_merchant_link
3	CanBBeauty	https://www.amazon.com/sp?ie=UTF8&seller=A1VE7T7WG4XP8W&asin=B0D1HDJGLR&ref_=dp_merchant_link
4	SSUYEURI aka ★★★★★SSUYEUR I (Black Friday Deals Up 70% OFF)	https://www.amazon.com/sp?ie=UTF8&seller=A1BDU4SSFKQX6Z&asin=B0CY8126DW&ref_=dp_merchant_link
5	SMIDOW Fashion Online	https://www.amazon.com/sp?ie=UTF8&seller=A3MJ76RSU6EPWT&asin=B0CTGWK55M&ref_=dp_merchant_link
6	Farmee--US (✕7-14 days delivery)	https://www.amazon.com/sp?ie=UTF8&seller=A3RPY9J7CJ9ECZ&asin=B0CYM36D85&ref_=dp_merchant_link
8	jiaoquan (5-10 days Delivery)	https://www.amazon.com/sp?ie=UTF8&seller=A16C3NVAF05HA0&asin=B0CWQP8BLO&ref_=dp_merchant_link
9	YAFINMO	https://www.amazon.com/sp?ie=UTF8&seller=A1HTDQRK6S3JW&asin=B0CX99SGFC&ref_=dp_merchant_link
10	YRAETENM	https://www.amazon.com/sp?ie=UTF8&seller=ABQBPAPFC561F&asin=B0DT77QXM6&ref_=dp_merchant_link
11	Ladily	https://www.amazon.com/sp?ie=UTF8&seller=AGWQBX005XAJZ&asin=B0CYC5L65M&ref_=dp_merchant_link
12	lightning deals of today-LR doldlcs	https://www.amazon.com/sp?ie=UTF8&seller=A138LZSTYPPTY1&asin=B0CWGFMT6B&ref_=dp_merchant_link
13	HCY-Store	https://www.amazon.com/sp?ie=UTF8&seller=A3FD939CIOWQTI&asin=B0CY523ZP4&ref_=dp_merchant_link
14	SolaraMind Store	https://www.amazon.com/sp?ie=UTF8&seller=A2IWH AQQTZNQU&asin=B0DQP86X&ref_=dp_merchant_link

Defendant No.	Seller's Name	Link to Seller's Website
15	LuckyEve	https://www.amazon.com/sp?ie=UTF8&seller=A184ZMUZ4YKM6Y&asin=B0D6Y6L7QS&ref_=dp_merchant_link&isAmazonFulfilled=1
16	Holiday Deals Up to 50% off-	https://www.amazon.com/sp?ie=UTF8&seller=A1GL8UED9ZAU5&asin=B0DVR5WYMC&ref_=dp_merchant_link
17	Loyalt	https://www.amazon.com/sp?ie=UTF8&seller=A5YMV293A174&asin=B0CCRJ8HWQ&ref_=dp_merchant_link
18	QJBMEI Store	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A2CJNR6NW0ZC5C&asin=B08D6135MN&ref_=dp_merchant_link&isAmazonFulfilled=1
19	Kingspinner	https://www.amazon.com/sp?ie=UTF8&seller=A3KXYZ0M5Q5YW4&asin=B0BXPVP8CK&ref_=dp_merchant_link
20	Wqioos	https://www.amazon.com/sp?ie=UTF8&seller=A9SSI0AAW9R5D&asin=B0D6YZS5SF&ref_=dp_merchant_link
21	LINBIYU	https://www.amazon.com/sp?ie=UTF8&seller=A3OIVVZN52HZDD&asin=B0D2J5B3DV&ref_=dp_merchant_link&isAmazonFulfilled=1
22	JUMISEE	https://www.amazon.com/sp?ie=UTF8&seller=A1SLP47D5DJWK&asin=B08V4XDHRB&ref_=dp_merchant_link&isAmazonFulfilled=1
23	Surprisestorm	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A10A0AHSGFU5XL&asin=B07MXVCH7N&ref_=dp_merchant_link
24	Jininghouhaishuilijianz hugon aka jininghouhaishuilijianz hugongchengyouxiang ongsi	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A85G20IZMEH7G&asin=B09FJV5S35&ref_=dp_merchant_link
25	LAMISION	https://www.amazon.com/sp?ie=UTF8&seller=A386BLU2GA7ULQ&asin=B0CYP3L21Q&ref_=dp_merchant_link&isAmazonFulfilled=1
26	Waasmia	https://www.amazon.com/sp?ie=UTF8&seller=AM7AQBFPNFTSJ&asin=B0D6FRZCJW&ref_=dp_merchant_link
27	NSSTAR	https://www.amazon.com/sp?ie=UTF8&seller=A1E9K8N0L9QR0J&asin=B0D66Y86XG&ref_=dp_merchant_link

Defendant No.	Seller's Name	Link to Seller's Website
28	AONTUS Fashion Store	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A264ZUL3F93JOW&asin=B09SHDYS3M&ref_=dp_merchant_link