

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

**CASE NO.: 1:25-cv-22489-RAR**

XYZ CORPORATION,

Plaintiff,

v.

ABC CORPORATION 1, *et al.*,

Defendants.

\_\_\_\_\_ /

**PLAINTIFF'S MOTION FOR ENTRY OF CLERK'S DEFAULT**

Plaintiff, Hong Kong Rujing E-Commerce Co. Limited ("Plaintiff") hereby moves for the Entry of Clerk's Default against the Defendants ChanPants and Laysam Tops ("Defendants"), as the Defaulting Defendants have failed to appear or otherwise respond to the Complaint within the time specified by the Federal Rules of Civil Procedure.

On July 2, 2025, the Court authorized electronic service via email on the Defendant [Dkt. No. 19]. On July 18, 2025, the Defendants were 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. 25-1, & 26-1.) The deadline to respond to the Complaint and Jury Demand (the "Amended Complaint") [D.E. 39] was August 8, 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-four days have passed since electronic service was completed on the Defendant, and to date, Defendant has not responded to the Complaint.

WHEREFORE, Plaintiff requests that a clerk's default be entered against the Defaulting Defendants, ChanPants and Laysam Tops.

DATED: August 11, 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 11<sup>th</sup> 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 11<sup>th</sup> 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*

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Joshua H. Sheskin (FL Bar No. 93028)  
**BAYRAMOGLU LAW OFFICES LLC**

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**[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: \_\_\_\_\_

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HONORABLE RODOLFO A. RUIZ II  
UNITED STATES DISTRICT COURT JUDGE