

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

Case No.: 1:25-CV-22117-RAR

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

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff") hereby moves for the Entry of Clerk's Default against JXUNDA, PENCHAHENG [DEALS OF THE DAY CLEARANCE] and CYSSXA aka LAYAN B ("Defaulting 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 June 25, 2025, the Court authorized electronic service via email on the Defendants [D.E. No. 15]. On July 31, 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.'s 26, 27, & 28 Return of Service on file with the Court.) making the deadline to respond to the Complaint and Jury Demand ("Complaint") [D.E. 1] August 21, 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, the Defendant has not responded to the Amended Complaint.

WHEREFORE, Plaintiff requests that default be entered against the Defaulting Defendants, JXUNDA, PENCHAHENG [DEALS OF THE DAY CLEARANCE], and CYSSXA aka LAYAN B.

DATED: August 22, 2025

Respectfully submitted,

/s/ Joshua H. Sheskin
Joshua H. Sheskin (FL Bar No. 93028)
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BAYRAMOGLU LAW OFFICES LLC
11540 W. Warm Springs Rd., Ste 100
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Tel: (702) 462 - 5973

Counsel for Plaintiff

VERIFICATION OF FACTS IN MOTION BY COUNSEL

I, Joshua H. Sheskin, Esq., hereby verify on this 22nd 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.

Joshua H. Sheskin
Joshua H. Sheskin
Fla. Bar No. 93028

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd 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)
BAYRAMOGLU LAW OFFICES LLC

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Defendants.

**[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 Defendants, JXUNDA, PENCHAHENG [DEALS OF THE DAY CLEARANCE] and CYSSXA aka LAYAN B, 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 Defendants.

IT IS SO ORDERED.

DATED: _____

HON. RODOLFO A. RUIZ II
UNITED STATES DISTRICT COURT JUDGE