

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

**CASE NO.: 1:25-cv-22977-RUIZ**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

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

Defendants.

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**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 Defendant Nos. 7-9 identified in Schedule "A" to the complaint (collectively, the "Defaulting Defendants"). The Defaulting Defendants<sup>1</sup> have been identified in detail in the accompanying Declaration of William Brees (the "Brees Decl."). See Brees Decl. ¶ 7. Plaintiff makes this motion on the ground that the Defaulting Defendants have failed to appear

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<sup>1</sup> Plaintiff does not seek entry of default against Defendant Nos. (3) oelaio amaz0n prime day 2024 deals aka oelaio black friday deals cyber monday deals 2024 aka oelaio spring deals 2025; (4) RKSTN Fashion; (5) jsaierl womens clothing aka fashion clothing clearance; and (6) XUNRYAN who were dismissed on September 2, 2025 (Dkt. No. 34). Plaintiff has reached a settlement agreement with Defendant Nos. 1 DONGYUAK; and 2 SxClub; and Plaintiff will file a notice of dismissal once the settlements have been fully executed and perfected.

or otherwise respond to the Complaint within the time prescribed by Federal Rules of Civil Procedure.

On July 22, 2025, the Court authorized electronic service via email on Defendants listed in Schedule "A" in connection with the Temporary Restraining Order ("TRO") [Dkt. No. 11].

On August 7, 2025, Defendants were served with the 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 in response to the request for expedited discovery as permitted by the TRO and via website publishing pursuant to the Court's Order authorizing alternate service of process. (Brees Decl. ¶ 4; see Dkt. No. 17 Return of Service on file with the Court.) The deadline to respond to the Complaint and Jury Demand (the "Complaint") [Dkt. No.1] was August 28, 2025. Brees Decl. at ¶ 5.

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 forty-two (42) days have expired since electronic service was effectuated on the Defaulting Defendants. *Id.* at ¶ 6. To date, none of the Defaulting Defendants have answered or otherwise responded to Plaintiff's Complaint. *Id.* at ¶ 7.

WHEREFORE, Plaintiff request that default be entered against the Defaulting Defendants, Schedule "A".

Dated: September 18, 2025

Respectfully Submitted,

By: /s/ William R. Brees

William R. Brees (Bar No. 98886)

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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I, hereby certify that on the 18th day of September, 2025, I electronically filed the foregoing document with the clerk of the court using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented to accept this Notice as service of this document by electronic means. 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.

/s/ William R. Brees  
WILLIAM R. BREES (FL BAR NO. 98886)  
**BAYRAMOGLU LAW OFFICES LLC**

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

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Defendants.

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**DECLARATION OF WILLIAM R. BRES 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 July 2, 2025, Plaintiff filed its Complaint and Jury Demand ("Complaint") [Dkt. No. 1] against Defendants, the Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations identified on Schedule "A" [Dkt. No. 1-1] (collectively, "Defendants").

3. On August 7, 2025, Plaintiff received from Amazon.com the contact email addresses on file with Amazon.com for each of the Defendants.

4. On August 7, 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. 17 Return of Service on file with the Court].

5. The deadline to respond to the Complaint was August 28, 2025.

6. As of the filing of this Motion, approximately forty-two (42) days have expired since electronic service was effectuated on the Schedule "A" Defendants.

7. Defendant Nos. 7-9 (the “Defaulting Defendants”) have failed to answer or otherwise respond to the Complaint or serve a copy of an Answer or other response upon Plaintiff’s attorneys of record. Identification of the Defaulting Defendants is shown in the chart below:

DEFAULTING DEFENDANTS		
NO.	SELLER’S NAME	LINK TO SELLER’S WEBSITE
7.	anyangzeshalu	<a href="https://www.amazon.com/sp?ie=UTF8&amp;seller=A3G1T3A60F9BOU">https://www.amazon.com/sp?ie=UTF8&amp;seller=A3G1T3A60F9BOU</a> is AmazonFulfilled 0 asin B0B5NX292P ref_olp_merch_name 1
8.	shihongrong shop shihongrong	<a href="https://www.amazon.com/sp?ie=UTF8&amp;seller=A21HHVIW3MCUAY">https://www.amazon.com/sp?ie=UTF8&amp;seller=A21HHVIW3MCUAY</a> asin B09Y4LF8CR ref_dp_merchant_link
9.	zantaoshangmao	<a href="https://www.amazon.com/sp?ie=UTF8&amp;seller=A30GWSWC1RBBN0">https://www.amazon.com/sp?ie=UTF8&amp;seller=A30GWSWC1RBBN0</a> isAmazonFulfilled 0 asin B098FDP9 L ref_olp_merch_name 1

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

Executed on September 18, 2025, in St. Petersburg, Florida.

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

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SCHEDULE "A,"

Defendants.

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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 ("Plaintiff"), Motion for Entry of Clerk's Default Against Certain Defendants pursuant to Federal Rule of Civil Procedure 55(a) (the "Motion") against certain non-appearing, through the filing of an answer or otherwise responsive pleading, Schedule "A" Defendants (the "Defaulting Defendants"). A true and correct listing of the Defaulting Defendants is included in this Order.

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: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE RODOLFO A. RUIZ II  
UNITED STATES DISTRICT COURT JUDGE

<b>DEFAULTING DEFENDANTS</b>		
<b>NO.</b>	<b>SELLER'S NAME</b>	<b>LINK TO SELLER'S WEBSITE</b>
7.	anyangzeshalu	https://www.amazon.com/sp ie UTF8 seller A3G1T3A60F9BOU is AmazonFulfilled 0 asin B0B5NX292P ref olp merch name 1
8.	shihongrong shop shihongrong	https://www.amazon.com/sp ie UTF8 seller A21HHVIW3MCUAY asin B09Y4LF8CR ref dp merchant link
9.	zantaoshangmao	https://www.amazon.com/sp ie UTF8 seller A30GWSWC1RBBN0 isAmazonFulfilled 0 asin B098FDP9 L ref olp merch name 1