

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

ABC CORP., A CHINESE COMPANY,

Defendant.

**Case No. 1:25-cv-08988-TMD**

**PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT  
AND DEFAULT JUDGMENT AGAINST SAIFANXIN**

Plaintiff Hong Kong Leyuzhen Technology Co., Ltd. (“Plaintiff”) hereby moves for entry of Default and Default Judgment against Defendant Saifanxin. Plaintiff files herewith a Memorandum of Law in support and accompanying declaration.

DATED: September 30, 2025

Respectfully Submitted,

By: /s/ Joshua H. Sheskin  
Joshua H. Sheskin (FL Bar 93028)  
**BAYRAMOGLU LAW OFFICES LLC**  
233 S Wacker Drive, 44<sup>th</sup> Floor, #57  
Chicago IL 60606  
Tel: (702) 462-5973 | Fax: (702) 553-3404  
joshua@bayramoglu-legal.com  
*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of September 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. 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, Amazon.

By: /s/ Joshua H. Sheskin  
Joshua H. Sheskin (FL Bar No. 93028)  
**BAYRAMOGLU LAW OFFICES LLC**

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

ABC CORP., A CHINESE COMPANY,

Defendant.

**Case No. 1:25-cv-08988-TMD**

**PLAINTIFF’S MEMORANDUM OF LAW IN SUPPORT OF MOTION  
FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT AGAINST  
THE IDENTIFIED SCHEDULE “A” DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co., Ltd. ("Plaintiff") hereby submits this Memorandum of Law in support of its Motion for Entry of Default and Default Judgment (the "Motion") pursuant to Federal Rule of Civil Procedure 55 ("Rule 55") against Saifaxin. Plaintiff's Motion is based on this Memorandum of Law, the Declaration of Joshua H. Sheskin, Esq. (the "Sheskin Decl."), the Declaration of Liangjie Li (the "Li Decl."), and the papers and pleadings on file in this case.

**I. INTRODUCTION**

On August 8, 2025, the Court authorized electronic service via email on Defendant [Dkt. No. 17]. Plaintiff completed service on all named Defendants and filed a Return of Service on August 29, 2025 [Dkt. No. 20]. The deadline to respond to the Complaint was September 19, 2025.

Plaintiff seeks an award of statutory damages under 17 U.S.C. § 504(c) against the Defaulting Defendant for infringing the Copyright Protected Image, which should be increased due to their willful infringement of the federally registered copyright VA0002413701 (the

"Copyright Protected Image"). (Sheskin Decl. ¶ 6.) Plaintiff also requests that the Court issue a permanent injunction against the Defendant. See 17 U.S.C. § 502(a). Alternatively, Plaintiff requests that the Court issue a permanent injunction based on the Defendant's willful violation of the Uniform Deceptive Trade Practices Act.

## **II. LEGAL STANDARD**

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 the Complaint filed by the Plaintiff in this case. Fed. R. Civ. P. 12(a)(1)(A). Under Federal Rule of Civil Procedure 55(a), "when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default." Fed. R. Civ. P. 55(a).

Procedurally, Rule 55(b)(2) provides for a court-ordered default judgment which establishes, as a matter of law, that the defendant is liable to the plaintiff on each cause of action alleged in the complaint. *United States v. Di Mucci*, 879 F.2d 1488, 1497 (7th Cir. 1989). When the Court determines that a defendant is in default, the factual allegations of the complaint are taken as true and may not be challenged. The defendant is liable as a matter of law as to each cause of action alleged in the complaint. *Black v. Lane*, 22 F.3d 1395, 1399 (7th Cir. 1994). Plaintiff meets the requirements for entry of the requested default judgment under Rule 55(b)(2).

## **III. FACTUAL BACKGROUND**

As alleged in the Complaint, the Defendant has publicly displayed unlicensed and unauthorized reproductions of Plaintiff's Copyright-Protected Image on Amazon's online sales platform (the "Platform") to market and sell competing products using Plaintiff's authentic Rotita

Brand Copyrighted Image, thereby deceiving consumers as to the quality, nature, and source of goods being purchased. (Sheskin Decl. ¶ 6.)

As of the filing of this Motion, approximately thirty-two days have expired since electronic service was effectuated on the Defendant. (Sheskin Decl. ¶ 5.) To date, Defendant has not answered or otherwise responded to Plaintiff's Complaint. (*Id.*) Therefore, the Clerk of the Court is compelled to enter default pursuant to Rule 55(a) against the Defaulting Defendants.

When the Court finds that a defendant is in default, the factual allegations of the complaint are accepted as true and cannot be challenged. The defendant is legally liable for each cause of action stated in the complaint. *Black v. Lane*, 22 F.3d 1395, 1399 (7th Cir. 1994).

In this case, the Defendant has willfully and intentionally infringed upon Plaintiff's copyrighted image, as alleged in the complaint, supporting the Plaintiff's request for enhanced statutory damages.

Plaintiff also satisfies the requirements for entry of the requested default judgment under Rule 55(b)(2).

#### **IV. ARGUMENT**

##### **A. Jurisdiction and Venue Are Proper in This Court**

This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Copyright Act, 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)-(b) and 28 U.S.C. § 1331. [Dkt. No. 1.]

Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendant because the Defendant directly targets business activities toward consumers in Illinois and causes harm to Plaintiff's business within this judicial district. [Dkt. No. 1]; *see also uBID, Inc. v. GoDaddy Grp., Inc.*, 623 F.3d 421, 423-24 (7th Cir.

2010) (without benefit of an evidentiary hearing, plaintiff bears only the burden of making a prima facie case for personal jurisdiction; all of plaintiff's asserted facts should be accepted as true and any factual determinations should be resolved in its favor.). Personal jurisdiction has been adequately alleged in this action, giving the Court jurisdiction over the Defendant.

### **B. Plaintiff Has Met the Requirements for Entry of Default Under Rule 55(a)**

Pursuant to Rule 55(a), "when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default." Fed. R. Civ. P. 55(a). The Plaintiff clearly meets these requirements as follows. The Plaintiff filed its Complaint alleging, among other claims, Copyright Infringement (Count I) and violation of the Uniform Deceptive Trade Practices Act (Count II), as detailed in the Complaint. [Dkt. No. 1].

The Defendant was properly served with the Complaint, Summons, and supporting documents via electronic service on August 29, 2025. [Dkt. No. 20]. The Defaulting Defendants had twenty-one (21) days to answer or otherwise respond to Plaintiff's Complaint under Rule 12(a)(1)(A). Therefore, they were required to respond by September 19, 2025. [*Id.*] As of the filing of this Motion, approximately thirty-two days have passed since electronic service was made on the Defendant. (Sheskin Decl. ¶ 4.) To date, the Defendant has not answered, appeared, or otherwise responded to the Complaint. (*Id.*)

Accordingly, the Clerk of the Court is required to enter default and default judgment under Rule 55 against the Defaulting Defendants.

### **C. Plaintiff is Entitled to Entry of the Requested Default Judgment**

A default judgment establishes, as a matter of law, that named, unresponsive defendants are liable for each cause of action alleged against them in the complaint. *Di Mucci*, 879 F.2d at

1497. When a court determines that a defendant is in default, the factual allegations of the complaint are taken as true and cannot be challenged. The Defendant is liable as a matter of law for each cause of action alleged in the complaint upon entry of default judgment. *Black*, 22 F.3d at 1399. Here, more than twenty-one (21) days have passed since the Defendant was served, and the Defendant has not filed any answer or responsive pleading. Therefore, entering a default judgment is appropriate. *See* Fed. R. Civ. P. 12(a)(1)(A).

Moreover, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the Defendant: (1) an award of statutory damages for copyright infringement under 17 U.S.C. § 504(c)(1); (2) an award of enhanced statutory damages per Defaulting Defendant for willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) entry of a permanent injunction pursuant to 17 U.S.C. § 502(a); and (4) alternatively, entry of a permanent injunction pursuant to 815 ILCS § 510/3.

**1. Plaintiff is entitled to statutory damages under 17 U.S.C. § 504(c)(1).**

Plaintiff is entitled to such relief for the Defaulting Defendant's infringement of the Plaintiff's Copyright-Protected Images, which was done willfully and intentionally. (Sheskin Decl. ¶¶ 8, 11-12.). A copyright owner is entitled to recover the actual damages suffered for infringement, and any profits of the infringer that are not attributable to the infringement and are not taken into account in computing the actual damages. 17 U.S.C. § 504(b).

In establishing the infringer's profits, the copyright owner is required to present proof only of the infringer's gross revenue, and the infringer is required to prove his or her deductible expenses and the elements of profit attributable to factors other than the copyrighted work. 17 U.S.C. § 504(b). "[S]tatutory damages have been held to be appropriate on a motion for default judgment because the defaulting party has the information needed to prove actual damages." *White v.*

*Marshall*, 771 F.Supp.2d 952, 956 (E.D. Wis. 2011); *see also Wondie v. Mekuria*, 742 F.Supp.2d 118, 124-25 (D.D.C. 2010); *Lifted Research Grp., Inc. v. Behdad, Inc.*, 591 F.Supp.2d 3, 8 (D.D.C. 2008).

In this case at bar, Plaintiff has asserted a viable claim for infringement of its Copyright-Protected Image. To prove copyright infringement, a plaintiff must show: "(1) ownership of a valid copyright; and (2) copying of constituent elements of the work that are original." *JWC Invs., Inc. v. Novelty, Inc.*, 482 F.3d 910, 914 (7th Cir. 2007). A certificate of copyright registration provides a *prima facie* presumption of validity. *Mid. American Title Co. v. Kirk*, 59 F.3d 719, 721 (7th Cir. 1995).

Plaintiff has claimed ownership of the asserted Copyright-Protected Image in its Complaint [Dkt. No. 1] and has provided the Court with a summary of all registrations issued by the United States Copyright Office [Dkt. No. 1, Ex. 1]. Additionally, Plaintiff has presented substantial factual allegations demonstrating that the Defendant has infringed upon the Plaintiff's Copyright-Protected Image. By defaulting the Defendant has admitted it has infringed the Plaintiff's Copyright-Protected Image.

Next, the Plaintiff is entitled to an award of statutory damages given the circumstances of this case. An award of statutory damages is appropriate because actual damages "are often virtually impossible to prove ..." *White*, 771 F.Supp.2d at 956. In awarding statutory damages, the court is not required to follow any strict formula. *Id.* (citing *Chi-Boy Music v. Charlie Club, Inc.*, 930 F.2d 1224, 1229 (7th Cir. 1991)). Instead, the court has broad discretion in setting a statutory damage award within the range of \$750 to \$30,000 per infringement. *Broadcast Music, Inc. v. Star Amusements, Inc.*, 44 F.3d 485, 489 (7th Cir. 1995). The court may consider factors such as the difficulty or impossibility of proving actual damages, the circumstances of the infringement, and

the effectiveness of the damages as a deterrent to future copyright violations. *Chi-Boy Music*, 930 F.2d at 1229.

The Plaintiff has clearly established valid claims of copyright infringement. Furthermore, the Defendant's willful refusal to appear and defend against the claims has prevented the Plaintiff from presenting evidence related to verifiable infringing sales or related costs.

Specifically, Amazon has provided sales data regarding the Defendant; however, since the Defendant is not participating in these proceedings, the Court cannot be provided with the infringers' deductible expenses related to the sale of the competing products associated with the unauthorized use and public display of Plaintiff's Copyright-Protected Image. *See* 17 U.S.C. § 504(b). As such, there is no verifiable information concerning the Defaulting Defendants' gross infringing sales of their competing products using Plaintiff's Copyright or the associated deductible expenses from the same. (Sheskin Decl. ¶ 8.)

Furthermore, while the Plaintiff can approximate the Defendant's net profits from their infringing sales on the Platform, this estimate is highly speculative. It cannot definitively account for the advertising expenses saved through the unauthorized use and display of the Plaintiff's Copyright-Protected Image, which it has produced at significant cost. (Li Decl. ¶ 10 & 11.) Therefore, an award of statutory damages is appropriate because actual damages are nearly impossible to prove in this case. *See White*, 771 F.Supp.2d at 956.

Considering the circumstances and the Defendant's conduct, the Plaintiff is entitled to statutory damages and an enhancement of statutory damages. In this case, the Defendant was provided with notice of these proceedings and elected not to appear and defend. (Sheskin Decl. ¶8). As a result of the Defendant's intentional decision not to appear and defend this action,

Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual damages. (*Id.*)

The plaintiff has expended considerable capital in securing the registration of the Copyright-Protected Image and advertising its brand in the United States and in the State of Illinois. (Li. Decl. ¶ 10 & 11.) This includes spending over \$80,000 to secure the company's copyright registrations with the United States Copyright Office and spending approximately \$8,000,000 to \$12,000,000 annually to advertise and promote its Rotita brand in the United States. (Li Decl. ¶ 10.) The significant investment in protecting the Rotitia Brand justifies Plaintiff's request for statutory damages.

The Defendant's infringement clearly supports awarding the requested statutory damage award against it. It is without question that the Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images, images have then appeared on the Defendant's online store maintained with the Platform. (Li Decl. ¶ 8.) Moreover, the Defendant has unquestionably been operating its online store using the misappropriated Copyright Protected Image. These actions by the Defendant, justify an award of statutory damages. Plaintiff respectfully requests the Court award statutory damages for copyright infringement under 17 U.S.C. § 504(c)(1) in the amount of \$5,000, to be trebled at the Court's discretion. (Sheskin Decl. ¶ 11)

***2. Plaintiff is entitled to enhanced statutory damages.***

Here, the Defendant's infringement clearly supports awarding an enhanced statutory damage award of, at least, treble damages against them. The Defendant's infringing conduct in this action is willful, thereby justifying enhanced damages under 17 U.S.C. § 504(c)(2). Defendant

has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. (Sheskin Decl. ¶¶ 10-11.)

Plaintiff's cases are monitored on [www.SellerDefense.cn](http://www.SellerDefense.cn). This website advises defendants in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. These circumstances reveal that Defendants usually decided to simply cut its losses where Plaintiff has a high likelihood of success, abandon any online storefront, and bask in the security that any judgment issued against them will almost certainly not be collectable in the Republic of China. (Sheskin Decl. ¶ 9.) Such circumstances support awarding Plaintiff enhanced statutory damages in this action. *See Chi-Boy Music*, 930 F.2d at 1229.

The facts presented further support awarding the enhanced statutory damages against the Defendant on the grounds that they should serve as a deterrent to future conduct. *Id.* at 1229-30. Here, the Defendant is, likely, watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Sheskin Decl. ¶ 9.) To maximize the deterrent effect of the Court's anticipated default and default judgment, Plaintiff is asking that enhanced statutory damages be imposed on the Defendant. (*Id.* ¶ 9.)

The Defendant has simply taken the apparent position that any recovery issued by a court is not executable against their assets on the named online platform in the U.S. This conduct demonstrates an intentional willingness to ignore the Court's authority to impose significant statutory damages in this action to send a message to the Defendant, and all other similar infringers, that they will incur substantial liability for their actions. In doing so, hopefully the Defendant, or other similar infringers monitoring this case, will post this anticipated award on the [www.SellerDefense.cn](http://www.SellerDefense.cn) website as notice of the consequences for their intentional, and orchestrated actions.

Hence, statutory damages should be trebled for willful infringement, pursuant to 17 U.S.C. § 504(c)(2).

**3. Plaintiff is entitled to a permanent injunction.**

Next, Plaintiff is entitled to entry of a permanent injunction against the Defaulting Defendant. This request is justified under either 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3.

This provision allows courts to issue such relief on terms deemed reasonable to protect the rights of copyright holders. In cases where defendants fail to respond or appear, courts have consistently granted permanent injunctions as part of default judgments, particularly when there is evidence of ongoing or likely future infringement. In *Virgin Records Am. Inc. v. Johnson*, the court granted a permanent injunction under § 502(a) due to the defendant's failure to respond and the likelihood of continued infringement, emphasizing the public interest in upholding copyright protections. *Virgin Records Am. Inc. v. Johnson*, 441 F. Supp. 2d 963. Here, Defaulting Defendants have elected to not appear or respond to the lawsuit and therefore shows a likelihood they will continue infringement absent a permanent injunction.

Courts in the 7th Circuit have also applied the four-factor test for injunctive relief, requiring plaintiffs to show irreparable harm, inadequacy of legal remedies, a balance of hardships favoring the plaintiff, and that the injunction serves the public interest. In *White v. Marshall*, the court noted that copyright infringement often constitutes irreparable harm and that monetary damages are inadequate, justifying injunctive relief. *White v. Marshall*, 771 F. Supp. 2d 952. Additionally, courts have recognized a presumption of irreparable harm in copyright cases, further supporting the issuance of permanent injunctions. *See also In re Aimster Copyright Litig.*, 252 F. Supp. 2d 634. Here, Plaintiff has a valid copyright claim against the Defendant, which has a presumption of

irreparable harm. Additionally, permanently enjoining the copyright infringement will ensure that public interest is met, by preventing any future, continued infringement of the Copyrighted Image.

As such, Plaintiff's right to permanent injunctive relief under 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3, is uncontested and supported by the substantial evidentiary record previously provided to the Court. Accordingly, Plaintiff is entitled to issuance of permanent injunctive relief against the Defendant.

### CONCLUSION

Under Rule 55(b)(2), Plaintiff respectfully requests this Court for entry of a default judgment finding the Defendant liable on all counts asserted in Plaintiff's Complaint. [Dkt. No. 1.] These asserted counts include claims for Copyright Infringement (Count I), and violation of the Illinois Uniform Deceptive Trade Practices Act (the "Uniform Deceptive Trade Practices Act") (Count II). [Dkt. No. 1] In granting its request, Plaintiff asks the Court to award the following: (1) statutory damages in the amount of \$5,000 under 17 U.S.C. § 504(c)(1); (2) enhanced treble statutory damages based on willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) issuance of a permanent injunction against the Defendant pursuant to 17 U.S.C. § 502(a) or, alternatively, under the Uniform Deceptive Trade Practices Act pursuant to 815 ILCS § 510/3; and (4) such other relief as the Court deems just and proper.

DATED: September 30<sup>th</sup>, 2025

Respectfully submitted,

By: /s/ Joshua H. Sheskin,  
Joshua H. Sheskin (FL Bar 93028)  
**BAYRAMOGLU LAW OFFICES LLC**  
233 S Wacker Drive, 44<sup>th</sup> Floor, #57  
Chicago IL 60606  
Tel: (702) 462-5973 | Fax: (702) 553-3404  
Joshua@bayramoglu-legal.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of September 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, TikTok.

By: /s/ Joshua H. Sheskin,  
Joshua H. Sheskin (FL Bar 93028)  
**BAYRAMOGLU LAW OFFICES LLC**

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

ABC CORP., A CHINESE COMPANY,

Defendant.

**Case No. 1:25-cv-08988-TMD**

**DECLARATION OF JOSHUA H. SHESKIN IN SUPPORT OF  
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Joshua H. Sheskin, of the City of Mt. Lebanon, in the State of Pennsylvania, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration relies on my personal knowledge of the facts listed below, and if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of the Plaintiff's Motion for Default and Default Judgment (the "Motion") against the Defendant SAIFANXIN.

3. I am an attorney at law, duly admitted to practice before the Courts of the State of Florida and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own knowledge unless stated otherwise.

4. I hereby certify that the Defendant has failed to plead or otherwise defend this action within twenty-one (21) days after being served with the Summons and Complaint in this action in violation of Federal Rule of Civil Procedure 12(a)(1)(A).

5. Specifically, Defendant was served with copies of the Summons and Complaint via electronic service, as authorized by the Court, on August 29, 2025, which is reflected in the Return of Summons filed in this case. [Dkt. No. 20.] As of the filing of this Motion, approximately thirty-two days have passed since electronic service was completed on the Defendant. Defendant has not answered, appeared, or otherwise responded to Plaintiff's Complaint in this case.

6. Plaintiff's asserted claims for relief in this action involve the intentional, willful infringement of the following federally registered copyright-protected image: VA0002413701 (the "Copyright Protected Image").

7. As alleged in the Complaint, the Defendant has displayed, without authorization, the Copyright Protected Image on Amazon.com's online sales platform (the "Platform") to market and sell competing products resembling Plaintiff's authentic Rotita brand items through its online store (the "Online Store"), thereby deceiving consumers about the quality, nature, and source of the goods being purchased.

8. The Defendant was notified of these proceedings and, apparently, chose not to appear and defend itself. Additionally, Amazon has provided sales data for the Defendant. However, due to the Defendant's deliberate decision not to participate, Plaintiff cannot obtain complete sales information from them. As a result, Plaintiff has been deprived of a meaningful opportunity to accurately assess its actual damages. This uncertainty supports Plaintiff's request for statutory damages against the Defendant.

9. To maximize the deterrent effect of the Court's expected default and default judgment, Plaintiff requests that enhanced statutory damages be imposed on the Defaulting Defendant, and that they be trebled.

10. The fundamental nature of the copyright infringement scheme shows that the Defendant not only was aware of the illegality of their actions but also had to use complex sources and well-established supply chains to carry it out. This is the only reasonable explanation for how the Defendant could quickly obtain, without permission, Plaintiff's copyright-protected product image and sell matching clothing through their online stores.

11. The facts presented not only demonstrate the Defaulting Defendant's knowledge and deliberate infringement of Plaintiff's Copyright-Protected Image. Therefore, Plaintiff should be awarded statutory damages, based on their intentional infringement of the Copyright Protected Images. Plaintiff asks for damages in the amount of \$5,000, to be trebled at the court's discretion.

12. My office, with assistance from our client and those assisting our client, investigated the infringing activities of the Defendant, including attempting to identify its contact information. Our investigation confirmed that the Defaulting Defendant is domiciled in Asia. As such, I am informed and believe that the Defendant is not an active-duty member of the U.S. armed forces.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: September 30, 2025

By: /s/ Joshua H. Sheskin  
Joshua H. Sheskin (Bar No. 93028)  
**BAYRAMOGLU LAW OFFICES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of September 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.

By: /s/ Joshua H. Sheskin  
Joshua H. Sheskin (Bar No. 93028)  
**BAYRAMOGLU LAW OFFICES, LLC**

# Exhibit A

**Defendant: SAIFANXIN**

**Amazon Seller ID: A3HBCTGR4HYC7L**

**Email: h0580565128i@163.com**

**Copyright Infringed: VA0002413701**

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

ABC CORP., A CHINESE COMPANY,

Defendant.

**Case No. 1:25-cv-08988-TMD**

**DECLARATION OF LIANGJIE LI IN SUPPORT OF PLAINTIFF'S  
MOTION FOR DEFAULT AND DEFAULT JUDGMENT**

I, Liangjie Li, of Hong Kong, a special administrative region of the People's Republic of China, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Motion for Default and Default Judgment (the "Motion").

3. I am the Chief Operations Officer for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff markets and sells women's clothing and related items under the "Rotita" brand name ("Rotita").

5. Rotita is a well-known source of women's clothing in the United States and has been the subject of rampant counterfeit sales through online platforms such as Alibaba, Walmart,

Amazon, Temu, eBay, Aliexpress, and TikTok (the “Platform”), which is the online sales platform at issue in this action. These are some of the largest online retailers in the World – and Plaintiff does not sell its products through any one of them. Rather, Plaintiff only sells its genuine Rotita brand products through its website rotita.com.

6. Plaintiff seeks an award of statutory damages against all Defendant (the “Defaulting Defendants”) in this action. The Defaulting Defendant is accused of intentionally and willfully infringing Plaintiff’s copyright bearing the registration VA0002413701, (the “Copyright Protected Image”).

7. It is without question that the Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. In this regard, Plaintiff’s Copyright Protected Images, often representing recent product releases, have appeared on the Defendant’s online store maintained with the Platform (the “Online Store”).

8. The basic nature of the copyright infringement scheme employed demonstrates that the Defendant not only knew of the impropriety of its conduct but had to implement its scheme through sophisticated sources and established supply chains. This is the only possible scenario under which the Defendant could immediately procure, without authorization, Plaintiff’s new copyright protected product images and offer them for sale through their Online Stores.

9. The Defendant has intentionally used the Copyright Protected Images for soliciting their competing Rotita product sales on a Platform that Plaintiff does not, and has not, utilized to sell its authentic products.

10. Plaintiff’s rough estimated gross revenue from United States sales likely exceeds \$20,000,000 USD per year. Of this amount, Plaintiff roughly estimates that over \$1,000,000 is derived from sales in the State of Illinois. Moreover, Plaintiff spends roughly anywhere from

\$8,000,000 to \$12,000,000 USD each year to specifically advertise its Rotita brand in the United States through such online advertising sources as Google Ads, Facebook, and Bing. Furthermore, the company has spent more than \$80,000 in filing fees paid to the United States Copyright Office just to secure registration of copyright protected works being asserted or that have been asserted in, over twenty (20) enforcement actions initiated in this judicial district. Simply put, Plaintiff is an extremely successful company that earns millions of dollars from product sales in the United States – including within the State of Illinois. To do so, Plaintiff annually spends millions of dollars advertising in the United States to promote the sale of its brand.

11. Plaintiff expects to earn a net profit of approximately 30% on the sale of its Rotita brand products. This figure, however, includes substantial advertising expenses that the Defaulting Defendants would not have to pay since they are largely capitalizing on Plaintiff's advertising efforts by misappropriating its copyright protected images and imbedding the term "Rotita" in their Temu.com search engine optimization. Doing so causes their online stores to be displayed whenever someone searches for "Rotita" on TikTok despite Plaintiff not selling authentic "Rotita" brand products on the platform. Based on the foregoing, I would estimate that the Defaulting Defendants' Online Stores operate at a net profit of between 40% to 50%. It is impossible to definitively calculate the Defendant's total sales on the Platform through the Online Store or to ascertain their expenses related to its infringing sales because it has failed to appear, defend, or otherwise participate in this action.

12. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defendant's unauthorized use of its federally registered copyright protected images asserted in this action. This results in the direct harm to Plaintiff's brand reputation and loss of consumer

goodwill, both of which are harms that are virtually impossible to ascertain the resulting economic loss.

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

Executed on September 30<sup>th</sup>, 2025, in Hong Kong.

By: /s/ Liangjie Li  
LIANGJIE LI

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of September, 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing 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 has been provided via email and by posting the filing on a URL contained on our website <https://blointernetenforcement.com/>, and distributed to ecommerce platform, TikTok.

By: /s/ Joshua H. Sheskin,  
Joshua H. Sheskin (FL Bar 93028)  
**BAYRAMOGLU LAW OFFICES LLC**