

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

MIRAJ ENTERPRISES,

Defendant.

**Case No.: 1:25-cv-11255-LAH-MDW**

**Honorable LaShonda A. Hunt**

**Magistrate M. David Weisman**

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff") hereby moves for entry of Default and Default Judgment against the Defendant, Miraj Enterprises ("Defendant"), as listed in Exhibit 1 to the accompanying Declaration of Katherine M. Kuhn (the "Kuhn Decl."). Plaintiff files herewith a Memorandum of Law in support, Declaration of Katherine M. Kuhn and Declaration of Liangjie Li. Plaintiff's Motion for Entry of Default and Default Judgment disposes of the case.

DATED: December 1, 2025

Respectfully Submitted,

By: /s/ Katherine M. Kuhn  
Katherine M. Kuhn (Bar No. 6331405)  
Joseph W. Droter (Bar No. 6329630)  
**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  
katherine@bayramoglu-legal.com  
joseph@bayramoglu-legal.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of December 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, Alibaba.

By: /s/ Katherine M. Kuhn  
Katherine M. Kuhn (Bar No. 6331405)

<b>Store Name</b>	<b>Store ID</b>	<b>Email</b>
MIRAJ ENTERPRISES	133453825790	info@mirajent.com

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
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HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

MIRAJ ENTERPRISES,

Defendant.

**Case No.: 1:25-cv-11255-LAH-MDW**

**Honorable LaShonda A. Hunt**

**Magistrate M. David Weisman**

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF  
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("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 the Defendant, Miraj Enterprises, ("Defaulting Defendant"), which has been separately listed in Exhibit 1 to the accompanying Declaration of Katherine M. Kuhn (the "Kuhn Decl."). Plaintiff's Motion is made and based upon this Memorandum of Law, the Kuhn Declaration, the Declaration of Liangjie Li (the "Li Decl."), the papers and pleadings on file in this action, and any argument of counsel the Court may entertain. Plaintiff's Motion for entry of Default and Default Judgment disposes of the case.

**I. INTRODUCTION**

On October 30, 2025, the Court authorized electronic service via email on the Defendant, MIRAJ ENTERPRISES [Dkt. No. 24]. Plaintiff completed service on the named Defendant and

filed a Return of Service on November 7, 2025 [Dkt. No. 27]. The deadline to respond to the Complaint was November 28, 2025.

Plaintiff seeks an award of statutory damages pursuant to 17 U.S.C. § 504(c) against the Defaulting Defendant for the infringement of Plaintiff's Copyright Protected Photographs, which should be enhanced for its willful infringement of the federally registered copyrights asserted in this action; VA0002379895, VA0002379888, VA0002379894 (the "Copyright Protected Photographs"). (Kuhn Decl. ¶ 5.) Plaintiff additionally requests the Court issue a permanent injunction against the Defaulting Defendant. *See* 17 U.S.C. § 502(a).

## **II. LEGAL STANDARD**

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), the Defaulting Defendant had twenty-one (21) days to answer or otherwise respond to Plaintiff's Complaint in this action. 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 defendant is liable to 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, and 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 Photographs on Alibaba's online sales platform (the "Platform") to market and sell competing products using Plaintiff's authentic Rotita brand Copyrighted photos, thereby deceiving public consumers as to the quality, nature, and source of goods being purchased. (Kuhn Decl. ¶ 6.) Moreover, the Defaulting Defendant is alleged to be operating as part of a coordinated, sophisticated network that utilizes a common supply chain and manufacturing source to fulfill consumer orders. As of the filing of this Motion, approximately twenty-four days (24) have expired since electronic service was effectuated on the Defendant (Kuhn Decl. ¶ 4.) To date, the Defaulting Defendant has not answered or filed a responsive pleading to Plaintiff's Complaint. (*Id.*) Therefore, the Clerk of the Court is compelled to enter default pursuant to Rule 55(a) against the Defaulting Defendant.

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, and 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). Here, Defaulting Defendant has willfully and intentionally infringed Plaintiff's Copyright Protected Photographs, supporting the Plaintiff's request for enhanced statutory damages. Plaintiff meets 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. 16 at 2-3.] Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendant since the Defendant directly targets business activities toward consumers in Illinois and causes harm to Plaintiff's business within this judicial district. [Dkt. No. 16 at 2-3]; *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. In the case at bar, it is unquestionable that the Defaulting Defendant is subject to personal jurisdiction in this action.

**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). Plaintiff clearly meets these requirements. Here, Plaintiff filed its Complaint alleging, among other claims, Copyright Infringement (Count I) as asserted in Plaintiff's Complaint. [Dkt. No. 16 at 17-26.]. Defendant was properly served with the Complaint, Summons, and all supporting documents via electronic service on November 7, 2025 [Dkt. No. 27]. The Defaulting Defendant had twenty-one (21) days to answer or otherwise respond to Plaintiff's Complaint pursuant to Rule 12(a)(1)(A). Here, the Defaulting Defendant was required to answer or otherwise respond to the Complaint on or before November 28, 2025. [*Id.*] As of the filing of this Motion, approximately twenty-four (24) days have expired since electronic service was effectuated on the Defaulting Defendant that is subject of Plaintiff's Motion. (Kuhn Decl. ¶ 4.) To date, the Defaulting Defendant has not answered or otherwise responded to Plaintiff's Complaint. (*Id.*) Accordingly, the Clerk of the Court is

compelled to enter default and default judgment pursuant to Rule 55 against the Defaulting Defendant.

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

A default judgment establishes, as a matter of law, that named, unresponsive Defendant is liable on 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 may not be challenged, and the defendant is liable as a matter of law as to 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 Defendant was served, and no answer or other responsive pleading has been filed by the Defaulting Defendant. *See* Fed. R. Civ. P. 12(a)(1)(A). Therefore, an entry of a default judgment is appropriate.

Moreover, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the Defaulting Defendant as listed out in Exhibit 1 to the Kuhn Declaration: (1) an award of statutory damages per Defaulting Defendant 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 company's Copyright Protected Photographs, which it maintains was done willfully and intentionally. (Kuhn 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 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 Photographs. 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). Here, Plaintiff has alleged its ownership of the asserted Copyright Protected Photographs in its First Amended Complaint [Dkt. No. 16] and has supplied the Court with a summary of all registrations issued by the United States Copyright Office [Dkt. No. 16, Ex. 1]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulting Defendant has infringed Plaintiff's Copyright Protected Photographs. [16-3] Therefore, the Defaulting Defendant has infringed Plaintiff's Copyright Protected Photographs.

Next, Plaintiff is entitled to an award of statutory damages given the circumstances in this action. 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 rigid formula. *Id.* (citing *Chi-Boy Music v. Charlie Club, Inc.*, 930

F.2d 1224, 1229 (7th Cir. 1991)). Instead, the court enjoys wide discretion in setting a statutory damage award within the prescribed range from \$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 such factors as the difficulty or impossibility of proving actual damages, the circumstances of the infringement, and the efficacy of the damages as a deterrent to future copyright infringement. *Chi-Boy Music*, 930 F.2d at 1229. Here, Plaintiff has established unquestionably viable copyright infringement claims in this case. Additionally, the Defaulting Defendant's willful refusal to appear and defend against the asserted claims has deprived Plaintiff of the ability to present evidence concerning verifiable infringing sales or costs associated with such sales. (*Id.* ¶ 7.)

Specifically, Alibaba has not provided any sales data regarding the Defaulting Defendant, however since they are 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 Photographs. *See* 17 U.S.C. § 504(b). As such, there is no verifiable information concerning the Defaulting Defendant's gross infringing sales of its competing products using Plaintiff's copyrights or the associated deductible expenses from same. (Kuhn Decl. ¶ 7.) Moreover, while Plaintiff can estimate the range of the Defaulting Defendant's net profits from their infringing sales provided by the Platform, this estimate is highly speculative and cannot affirmatively account for the advertising expenses saved through the unauthorized use and display of the company's Copyright Protected Photographs for which it has created at considerable expense. (Li Decl. ¶ 11.) Therefore, an award of statutory damages is appropriate because actual damages are virtually impossible to prove in this case. *See White*, 771 F.Supp.2d at 956. Given the foregoing circumstances, and the nature of the Defaulting Defendant's conduct, Plaintiff asserts that it is entitled to an award of statutory damages against

Defaulting Defendant and submits a Defendant analysis showing Defaulting Defendant, the copyrights infringed, and the statutory damages requested per copyright infringed. (Kuhn Decl. ¶ 12, Exhibit. 1.)

In this case the Defaulting Defendant was provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend. (Kuhn Decl. ¶ 7). As a result of the Defaulting 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.*) Plaintiff has expended considerable capital in securing registration of the Copyright Protected Photographs and advertising its brand in the United States and in the State of Illinois. (Li. Decl. ¶ 10.) 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.) These facts unquestionably support Plaintiff's request statutory damages per infringed Copyright Protected Photograph.

The actions of the Defaulting Defendant's infringement clearly support awarding the requested statutory damage award against them. It is without question that the Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Photographs. In this regard, Plaintiff's Copyright Protected Photographs, often representing product releases, have then appeared on the Defaulting Defendant's online stores maintained with the Platform. (Li Decl. ¶ 7.) Moreover, the Defaulting Defendant has unquestionably been operating their online stores using the misappropriated Copyright Protected Photographs through a sophisticated network utilizing a highly developed supply chain capable of supplying thousands of competing products featuring an array of similarities to Plaintiff's textile

patterns and designs that could not otherwise be accomplished on an individual basis. (Kuhn Decl. ¶¶ 8, 11.) 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) against Defaulting Defendant per infringed Copyright Protected Photograph. (Kuhn Decl. ¶ 12, Ex. 1)

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

Here, the Defaulting Defendant's infringement clearly supports awarding an enhanced statutory damage award of, at least, treble damages against them. The Defaulting Defendant's infringing conduct in this action are willful, thereby justifying enhanced damages under 17 U.S.C. § 504(c)(2). Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Photographs. (Kuhn Decl. ¶¶ 8, 11-12.) Plaintiff's Copyright Protected Photographs, often representing recent product releases, have appeared on each the Defaulting Defendant's online stores maintained with the Platform. (Li Decl. ¶ 7.) The Defaulting Defendant has clearly been operating their online stores using the unauthorized and unlicensed Copyright Protected Photographs. Upon information and belief, the Defaulting Defendant, has been acting through its network to actively monitor and post information on the Plaintiff's pending cases on the website [www.SellerDefense.cn](http://www.SellerDefense.cn). (Kuhn Decl. ¶ 8.) This has apparently been done to advise Defendant in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. (*Id.*) These circumstances reveal an overall common scheme the Defaulting Defendant, to simply cut their 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. (Kuhn Decl. ¶ 8.) 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 Defaulting Defendant on the grounds that they should serve as a deterrent to future conduct. *Id.* at 1229-30. Here, the Defaulting Defendant is watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Kuhn Decl. ¶ 8.) 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 Defaulting Defendant for each alleged infringement of the Copyright Protected Photographs. (*Id.* ¶ 9.) The Defaulting 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 Defaulting Defendant, and all other similar infringers, that they will incur substantial liability for their actions. In doing so, hopefully the Defaulting 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.

Here, Plaintiff respectfully requests the Court enter an award of statutory damages against Defaulted Defendant per infringed Copyright Protected Photograph, which should be treble enhanced for willful infringement against Defaulted Defendant per infringed Copyright Protected Work, 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).

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. See *Virgin Records Am. Inc. v. Johnson*, where 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 Defendant has 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 Defaulting Defendant, which has a presumption of irreparable harm in this case. Additionally, permanently enjoining the copyright infringement will ensure that public interest is met, by preventing any future, continued infringement of the Copyright Protected Photographs.

As such, Plaintiff's right to permanent injunctive relief under 17 U.S.C. § 502(a), 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 Defaulting Defendant.

**V. CONCLUSION**

Under Rule 55(b)(2), Plaintiff respectfully requests this Court for entry of a default judgment finding the Defaulting Defendant liable on all counts asserted in Plaintiff's First Amended Complaint. [Dkt. No. 16] These asserted counts include claims for Copyright Infringement (Count I). [Dkt. No. 16 at 17-26.] In granting its request, Plaintiff asks the Court to award the following: (1) statutory damages against Defaulting Defendant per infringed Copyright Protected Photograph pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced treble statutory damages against Defaulting Defendant per infringed Copyright Protected Photograph based on its willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) issuance of a permanent injunction against the Defaulting Defendant pursuant to 17 U.S.C. § 502(a); and (4) such other relief as the Court deems just and proper.

DATED: December 1, 2025

Respectfully Submitted,

By: /s/ Katherine M. Kuhn  
Katherine M. Kuhn (Bar No. 6331405)  
Joseph W. Droter (Bar No. 6329630)  
**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  
katherine@bayramoglu-legal.com  
joseph@bayramoglu-legal.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of December 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, Alibaba.

By: /s/ Katherine M. Kuhn  
Katherine M. Kuhn (Bar No. 6331405)

<b>Store Name</b>	<b>Store ID</b>	<b>Email</b>
MIRAJ ENTERPRISES	133453825790	info@mirajent.com

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

MIRAJ ENTERPRISES,

Defendant.

**Case No.: 1:25-cv-11255-LAH-MDW**

**Honorable LaShonda A. Hunt**

**Magistrate M. David Weisman**

**DECLARATION OF KATHERINE M. KUHN IN SUPPORT OF  
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Katherine M. Kuhn, of the City of Chicago, in the State of Illinois, 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 Entry of Default and Default Judgment (the "Motion") against the Defendant, MIRAJ ENTERPRISES, ("Defaulting Defendant").

3. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois 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. Limited ("Plaintiff"). I make this declaration from my matters within my own knowledge unless stated otherwise.

4. I hereby certify that the Defaulting Defendant (as defined in the accompanying Memorandum) has failed to plead or otherwise defend this action within twenty-one (21) days after being served with the Summons and First Amended Complaint in this action in violation of

Federal Rule of Civil Procedure 12(a)(1)(A). Specifically, Defendant was served with copies of the Summons and First Amended Complaint via electronic service authorized by the Court on November 7, 2025, which is reflected in the Return of Summons filed in this case. [Dkt. No. 27] As of the filing of this Motion, approximately twenty-four (24) days have expired since electronic service was effectuated on the Defendant, which includes the Defaulting Defendant that is the subject of Plaintiff's Motion. The identified Defaulting Defendant has not answered or otherwise responded to Plaintiff's First Amended Complaint in this action.

5. Plaintiff's asserted claims for relief in this action involve the intentional, willful infringement of the federally registered copyright protected photographs; VA0002379895, VA0002379888, VA0002379894 (the "Copyright Protected Photographs").

6. As alleged in the Complaint, the Defaulting Defendant has displayed, without authorization, the Copyright Protected Photographs on the Alibaba.com online sales platform (the "Platform") to market and sell competing products resembling Plaintiff's authentic Rotita brand products through their online stores (the "Online Stores"), thereby deceiving public consumers as to the quality, nature, and source of goods being purchased.

7. Plaintiff is entitled to statutory damages in this action as described in **Exhibit 1** to this Declaration, which shows the Defendant Statutory Damages Request based on the copyright infringement. First, the Defaulting Defendant was provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend this action. Additionally, the platform Alibaba has not provided any sales data for Defendant. As a result of the Defaulting Defendant's intentional decision not to appear and defend this action, Plaintiff is unable to receive the complete sales information from Defendant. Accordingly, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual damages. This uncertainty supports Plaintiff's requested statutory damages against the Defaulting Defendant.

8. In addition, defendants in multiple copyright enforcement actions in this judicial district, which includes the Defaulting Defendant, have been acting through their network to actively monitor and post information on the Plaintiff's pending cases on the website [www.SellerDefense.cn](http://www.SellerDefense.cn). This has apparently been done to advise defendant in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. These circumstances reveal an overall strategy by all non-appearing defendant, including the Defaulting Defendant, to simply cut their losses where Plaintiff has a high likelihood of success, abandon their online store, and bask in the security that any judgment issued against them will almost certainly not be collectable in the Republic of China. Simply put, the Defaulting Defendant is watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district.

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 Defaulting Defendant for each alleged infringement of the Copyright Protected Photographs.

10. Such an award precludes the Defaulting Defendant from shielding themselves from monetary responsibility for the collective infringement of common Copyright Protected Photographs. *Desire, LLC v. Manna Textiles, Inc.*, 986 F.3d 1253, 1264-1272 (9th Cir. 2021). Rather, Plaintiff expressly requests that the Defaulting Defendant, be assessed an enhanced statutory damage award as described in **Exhibit 1** to this Declaration for its infringement of the Copyright Protected Photographs.

11. Plaintiff has alleged, and has offered proof, that the Defaulting Defendant has not only engaged in the infringement of the Copyright Protected Photographs, but they have done so through a highly sophisticated network. Moreover, the basic nature of the copyright infringement scheme employed demonstrates that the Defaulting Defendant not only knew of the impropriety

of its conduct but had to implement their scheme through sophisticated sources and established supply chains. This is the only possible scenario under which the Defaulting Defendant could immediately procure, without authorization, Plaintiff's copyright protected product images and offer them for sale through its online stores.

12. The presented facts not only establish the Defaulting Defendant's knowledge and intentional infringement of Plaintiff's Copyright Protected Photographs. Accordingly, Plaintiff should be awarded statutory damages as described in **Exhibit 1** to this Declaration, which lists the Defaulted Defendant, the infringed Copyright Protected Photograph, the statutory damage amount requested per infringement, and the amount requested based on the Defaulted Defendant's willful infringement with treble the enhancement against Defaulted Defendant based on its willful infringement of the Copyright Protected Photographs.

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

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

DATED: December 1, 2025,

By: /s/ Katherine M. Kuhn  
Katherine M. Kuhn (Bar No. 6331405)  
**BAYRAMOGLU LAW OFFICES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of December 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, Alibaba.

By: /s/ Katherine M. Kuhn  
Katherine M. Kuhn (Bar No. 6331405)

<b>Store Name</b>	<b>Store ID</b>	<b>Email</b>
MIRAJ ENTERPRISES	133453825790	info@mirajent.com

# Exhibit 1

Hong Kong Leyuzhen Technology Co. Limited v. MIRAJ ENTERPRISES  
 1:25-cv-11255

<b>Alibaba Store Name/Defendant Contact</b>	<b>Copyright Infringed</b>	<b>Statutory Amount Requested</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
<b>MIRAJ ENTERPRISES</b> 133453825790 info@mirajent.com	<b>VA0002379895</b>	\$5,000	<b>Total: \$15,000</b>
<b>MIRAJ ENTERPRISES</b> 133453825790 info@mirajent.com	<b>VA0002379888</b>	\$5,000	<b>Total: \$15,000</b>
<b>MIRAJ ENTERPRISES</b> 133453825790 info@mirajent.com	<b>VA0002379894</b>	\$5,000	<b>Total: \$15,000</b>
		\$15,000.00	<b>TOTAL: \$45,000.00</b>

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

MIRAJ ENTERPRISES,

Defendant.

**Case No.: 1:25-cv-11255-LAH-MDW**

**Honorable LaShonda A. Hunt**

**Magistrate M. David Weisman**

**DECLARATION OF LIANGJIE LI IN SUPPORT OF PLAINTIFF'S  
MOTION FOR ENTRY OF 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 TikTok, Walmart,

Amazon, Temu, eBay, AliExpress, and Alibaba (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 the Defendant, MIRAJ ENTERPRISES, (the “Defaulting Defendant”) in this action. The Defaulting Defendant is accused of intentionally and willfully infringing Plaintiff’s federally registered copyrights asserted in this action; VA0002379895, VA0002379888, and VA0002379894 (the “Copyright Protected Photographs”).

7. It is without question that the Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Photographs. In this regard, Plaintiff’s Copyright Protected Photographs, often representing recent product releases, have appeared on the Defaulting Defendant’s online stores maintained with the Platform (the “Online Stores”). Moreover, the Defaulting Defendant has unquestionably been operating its Online Stores using the misappropriated Copyright Protected Photographs through a sophisticated network utilizing a highly developed supply chain capable of supplying thousands of competing products featuring an array of Plaintiff’s textile patterns and designs that could not otherwise be accomplished on an individual basis.

8. The basic nature of the copyright infringement scheme employed demonstrates that the Defaulting 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 Defaulting Defendant could immediately procure, without authorization,

Plaintiff's new copyright protected product images and offer them for sale through their Online Stores.

9. The Defaulting Defendant has intentionally used the Copyright Protected Photographs for soliciting its 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 in, currently, 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 tens of 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 Defendant would not have to pay since they are largely capitalizing on Plaintiff's advertising efforts by misappropriating its Copyright Protected Photographs and imbedding the term "Rotita" in their Alibaba.com search engine optimization. Doing so causes their online stores to be displayed whenever someone searches for "Rotita" on Alibaba despite Plaintiff not selling authentic "Rotita" brand products on the platform. Based on the foregoing, I would estimate that

the Defaulting Defendant's Online Stores operate at a net profit of between 40% to 50%. I believe that a disgorgement of the Defaulting Defendant's profits would fall within the net profit range. However, it is impossible to definitively calculate the Defaulting Defendant's total sales on the Platform through their Online Stores or to ascertain their expenses related to their infringing sales because they have failed to appear, defend, or otherwise participate in this action.

12. The Defaulting Defendant named in Plaintiff's copyright infringement enforcement actions are engaged in the practice of copying Plaintiff's copyright protected product images after they are first displayed on the company's website and then associating these images with sale and promotion of unauthorized products of substandard quality, thereby deceiving consumers, including the citizens of the State of Illinois. Moreover, given the nature of Plaintiff's goods, such large-scale sales operations over multiple online retail platforms require considerable supply chain coordination that could not reasonably be accomplished independently by the named Defaulting Defendant. Simply put, Plaintiff maintains that the Defaulting Defendant is acting in concert, pursuant to a common scheme, whereby they independently copy Plaintiff's copyright protected photographs, without authorization, from its website or such unauthorized images are being provided by the same common source associated with manufacturing the competing products being sold on the Defaulting Defendant's Platform storefronts.

13. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendant's unauthorized use of its federally registered Copyright Protected Photographs 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 December 1, 2025, in Hong Kong.

By: /s/ Liangjie Li  
LIANGJIE LI

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of December 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, Alibaba.

By: /s/ Katherine M. Kuhn  
Katherine M. Kuhn (Bar No. 6331405)

<b>Store Name</b>	<b>Store ID</b>	<b>Email</b>
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