

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

TICTICMISS Fashion,

Defendant.

**Case No. 1:25-cv-07242-MMP-JTG**

**Honorable Martha M. Pacold**

**Magistrate Jeffrey T. Gilbert**

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT AGAINST  
DEFENDANT TICTICMISS FASHION**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff") hereby moves for entry of Default Judgment against Defendant TICTICMISS Fashion. Plaintiff files herewith a Memorandum of Law in support. Plaintiff's Motion for entry of Default Judgment disposes of all remaining defendants.

DATED: February 25, 2026

Respectfully submitted,

By: /s/ Nazly A. Bayramoglu  
Nazly A. Bayramoglu (NM Bar No. 151569)  
**BAYRAMOGLU LAW OFFICES LLC**  
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nazly@bayramoglu-legal.com  
*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of February 2026, 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/ Nazly A. Bayramoglu  
Nazly A. Bayramoglu (NM Bar No. 151569)

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

TICTICMISS Fashion,

Defendants.

**Case No. 1:25-cv-07242-MMP-JTG**

**Honorable Martha M. Pacold**

**Magistrate Jeffrey T. Gilbert**

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR ENTRY OF  
DEFAULT JUDGMENT AGAINST DEFENDANT TICTICMISS FASHION**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff") hereby submits this Memorandum of Law in support of its Motion for Entry of Default Judgment (the "Motion") pursuant to Federal Rule of Civil Procedure 55 ("Rule 55") against Defendant TICTICMISS Fashion (the "Defaulting Defendant"). Plaintiff's Motion is made and based upon this Memorandum of Law, the Declaration of Nazly A. Bayramoglu (the "Bayramoglu Decl."), 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 Judgment disposes of all remaining defendants.

**INTRODUCTION**

Plaintiff's request for entry of default judgment is straightforward. On January 15, 2026, the Court authorized electronic service via email on Defendant TICTICMISS Fashion [Dkt. No. 37]. Plaintiff completed service on Defendant and filed a Return of Service on January 20, 2026 [Dkt. No. 40]. The deadline to respond to the Complaint was February 10, 2026.

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A) ("Rule 12(a)(1)(A)"), the Defaulting Defendant 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 twenty-three days (23) have expired since electronic service was effectuated on the Defaulting Defendant. (Bayramoglu Decl. ¶ 4.). To date, the Defaulting Defendant has not answered or otherwise responded to Plaintiff's Complaint. (*Id.*). Plaintiff filed its Motion for Entry of Default against Defendant, which was granted on February 25, 2026. [Dkt. 47].

Pursuant to Rule 55(b)(2), Plaintiff now respectfully moves 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. 24]. 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. 24 at 46-69].

In connection with its asserted claims for relief, Plaintiff seeks an award \$5,000 of statutory damages pursuant to 17 U.S.C. § 504(c) against the Defaulting Defendant, which should be enhanced \$15,000, for their willful infringement of the following federally registered copyright asserted in this action: VA0002379907 (the "Copyright Protected Image"). (Bayramoglu Decl. ¶ 5). Plaintiff additionally requests the Court issue a permanent injunction against the Defaulting Defendant. *See* 17 U.S.C. § 502(a). Furthermore, Plaintiff requests an award of attorneys' fees and costs for the Defaulting Defendant's willful infringement of the company's Copyright Protected Image pursuant to 17 U.S.C. § 505. Alternatively, Plaintiff requests issuance of a permanent injunction and an award of attorneys' fees and costs based on the Defaulting Defendant's willful violation of the Uniform Deceptive Trade Practices Act.

As alleged in the Complaint, the Defaulting Defendant has displayed, without authorization, the Copyright Protected Image on the Amazon.com online sales platform (the "Platform") to market and sell knockoff products using Plaintiff's authentic Rotita brand Copyrighted image, thereby deceiving public consumers as to the quality, nature, and source of goods being purchased. (Bayramoglu Decl. ¶ 6). Moreover, the Defaulting Defendant is alleged to be operating as part of a coordinated, sophisticated counterfeit product network that utilizes a common supply chain and manufacturing source to fulfill consumer orders for knockoff Rotita brand products by displaying, without authorization, Plaintiff's Copyright Protected Image on their online storefront. (Bayramoglu Decl. ¶¶ 8, 11-12). These circumstances clearly demonstrate the Defaulting Defendant has willfully and intentionally infringed Plaintiff's Copyright Protected Image, thereby supporting the company's request for enhanced statutory damages and its entitlement to an award of attorneys' fees and costs under either the Copyright Act (17 U.S.C. § 505) or the Uniform Deceptive Trade Practices Act (815 ILCS § 510/3). (*Id.*).

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 defendants are 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).

## 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. 24 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 the 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. 24 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 addition to the foregoing, the Court has determined that it can properly exercise specific personal jurisdiction over the Defendant in granting Plaintiff's motion for electronic service of process. [Dkt. No. 37]. Accordingly, it is unquestionable that the Defaulting Defendant is subject to personal jurisdiction in this action.

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

Rule 55(b)(2) of the Federal Rules of Civil Procedure generally provides for entry of a court-ordered default judgment against one or more defending parties that fail to appear, answer, and/or defend allegations asserted against them. Fed. R. Civ. P. 55(b)(2). A default judgment establishes, as a matter of law, that named, unresponsive defendants are 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 defendants are 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.

On September 8, 2025, Plaintiff filed its First Amended Complaint in this action alleging, among other claims, Copyright Infringement (Count I), and violation of the Uniform Deceptive Trade Practices Act (Count II) as asserted in the company's Complaint. [Dkt. No. 1 at 46-69]. The Defaulting Defendant was properly served with the Complaint, and all supporting documents via electronic service on January 20, 2026. [Dkt. No. 40]. Specifically, the Defaulting Defendant was required to answer or otherwise respond to the Complaint on or before February 10, 2026. [*Id.*]. As such, the Defaulting Defendant had twenty-one (21) days to answer or otherwise respond to Plaintiff's complaint pursuant to Rule 12(a)(1)(A). *See* Fed. R. Civ. P. 12(a)(1)(A). Thus, default judgment is appropriate, and Plaintiff is entitled to entry of a default judgment pursuant to Rule 55(b)(2) against the Defaulting Defendant for copyright infringement, false designation of origin, and violation of the Uniform Deceptive Trade Practice Act as asserted in the Complaint. [Dkt. No. 24].

As argued below, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the Defaulting Defendant: (1) an award of \$5,000 in statutory damages and profits for copyright infringement under 17 U.S.C. § 504(c)(1); (2) an award of enhanced \$15,000 in statutory damages 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.

### **C. Plaintiff is Entitled to the Relief Requested**

Through entry of default, Plaintiff has established that the Defaulting Defendant: (1) is liable for intentionally and willfully infringing the Copyright Protected Image; and (2) has willfully

violated the Uniform Deceptive Trade Practices Act. [Dkt. No. 24]. As such, the only issues that remain to be adjudicated through the Motion are: (1) Plaintiff's entitlement to an award of statutory damages for infringement of the Copyright Protected Image; (2) the company's request that any statutory damage award be enhanced based on the Defaulting Defendant's willful copyright infringement; and (3) the company's right to issuance of a permanent injunction against the Defaulting Defendant. Plaintiff asserts that it is entitled to all relief requested through its Motion.

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

Turning first to the request for an award of statutory damages under 17 U.S.C. § 504(c)(1) against the Defaulting Defendant. Plaintiff is entitled to such relief for the Defaulting Defendant's infringement of the company's Copyright Protected Image, which it maintains was done willfully and intentionally. (Bayramoglu 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).

First, Plaintiff has asserted a viable claim for infringement of the 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). Here, Plaintiff has alleged its ownership of the asserted Copyright Protected Image in its Complaint [Dkt. No. 24]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulting Defendant has infringed the company's Copyright Protected Image. [Dkt. No. 24-2]. Accordingly, Plaintiff has established that the Defaulting Defendant has infringed the company's Copyright Protected Image.

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.

Plaintiff has established unquestionably viable copyright infringement claims in this case. The Defaulting Defendant's willful refusal to appear and defend against the asserted claims, however, has deprived Plaintiff of the ability to present evidence concerning verifiable infringing sales or costs associated with such sales. (Bayramoglu Decl. ¶ 7).

Specifically, Plaintiff has neither obtained, nor is the Defaulting Defendant participating in these proceedings, so that the Court can be provided with the infringer's deductible expenses related to the sale of the counterfeit products associated with the unauthorized use and display of the company's Copyright Protected Image. *See* 17 U.S.C. § 504(b). As such, there is no verifiable information concerning the Defaulting Defendant's gross infringing sales of their competing products using Plaintiff's copyright or the associated deductible expenses from same. (Bayramoglu 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 Image for which it has created at considerable expense. (Li Decl. ¶ 11). Accordingly, 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 \$5,000 in statutory damages against the Defaulting Defendant. (Bayramoglu Decl. ¶ 12, Exhibit. 1). First, the Defaulting Defendant was provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend. (Bayramoglu 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.*).

Moreover, Plaintiff has expended considerable capital in securing registration of the Copyright Protected Image 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 for statutory damages against the Defaulted Defendant.

Next, the circumstances 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 Image. In this regard, Plaintiff's Copyright Protected Image, often representing recent product releases, has then appeared on the Defaulting Defendant's online store maintained with the Platform. (Li Decl. ¶ 7). Moreover, the Defaulting Defendant has unquestionably been operating their online store using the misappropriated Copyright Protected Image through a sophisticated counterfeit network utilizing a highly developed supply chain capable of supplying thousands of knockoff products featuring an array of Plaintiff's textile patterns and designs that could not otherwise be accomplished on an individual basis. (Bayramoglu Decl. ¶¶ 8, 11). Accordingly, the Defaulting Defendant unquestionably intentionally, and willfully, infringed Plaintiff's Copyright Protected Image to sell their knockoff products, thereby justifying an award of statutory damages.

Based on the foregoing, Plaintiff respectfully requests the Court award \$5,000 statutory damages against the Defaulting Defendant for the infringement of the Copyright Protected Image as described in Exhibit 1 to the Bayramoglu Declaration. As set forth in Plaintiff's supporting documentation, the Defaulting Defendant in this action should be found liable for statutory damages because of their infringements of the Copyright Protected Image. (Bayramoglu Decl. ¶ 12, Exhibit. 1). Accordingly, Plaintiff respectfully requests the Court award statutory damages for

copyright infringement under 17 U.S.C. § 504(c)(1) in an amount not less than \$5,000.00 against the Defaulting Defendant. (Bayramoglu Decl. ¶ 12, Ex. 1).

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

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

It is without question that the Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Image. (Bayramoglu Decl. ¶¶ 8, 11-12). In this regard, Plaintiff's Copyright Protected Image, often representing recent product releases, has appeared on the Defaulting Defendant's online store maintained with the Platform. (Li Decl. ¶ 7). Moreover, the Defaulting Defendant has clearly been operating their online store using the misappropriated Copyright Protected Image through a sophisticated counterfeit network utilizing a highly developed supply chain capable of supplying thousands of knockoff products featuring an array of Plaintiff's textile patterns and designs that could not otherwise be accomplished on an individual basis. (Bayramoglu Decl. ¶¶ 8, 11-12).

In addition, defendants in multiple copyright enforcement actions in this judicial district, which includes the Defaulting Defendant, has been acting through their counterfeit network to actively monitor and post information on the Plaintiff's pending cases on the website [www.SellerDefense.cn](http://www.SellerDefense.cn). (Bayramoglu Decl. ¶ 8). This has apparently been done to advise defendants 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 strategy by all non-appearing defendants, including the Defaulting Defendant, to simply cut their losses

where Plaintiff has a high likelihood of success, abandon any online platform restrained funds, and bask in the security that any judgment issued against them will almost certainly not be collectable in the Republic of China. (Bayramoglu 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. Simply put, the Defaulting Defendant is watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Bayramoglu 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 the alleged infringement of the Copyright Protected Image. (*Id.* ¶ 9). Simply put, the Defaulting Defendant, as with other similarly situated defendants, has simply taken the apparent position that any recovery issued by a court is only executable against their restrained assets on the named online platform. (*Id.*). 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.

Based on the foregoing, Plaintiff respectfully requests the Court award enhanced statutory damages of not less than treble the requested statutory damages against Defaulting Defendant per infringed Copyright Protected Work. As set forth in Plaintiff's supporting documentation, the Defaulting Defendant in this action should be found liable \$15,000 because of their willful

infringement for the Copyright Protected Image. (Bayramoglu Decl. ¶ 12, Exhibit. 1). Accordingly, Plaintiff respectfully requests the Court enter an award of \$5,000 statutory damages against Defaulted Defendant per infringed Copyright Protected Image, which should be treble enhanced to \$15,000 for willful infringement against Defaulted Defendant, 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.

Plaintiff has established that through the Defendant's illegal operations, the Defendant has infringed upon Plaintiff's federally registered Copyright: VA0002379907. [Dkt. No. 24, Ex. 2]. 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 provided to the Court. Accordingly, Plaintiff is entitled to issuance of permanent injunctive relief against the Defaulting Defendant.

**CONCLUSION**

Based on the foregoing, Plaintiff respectfully requests entry of default judgment against the Defaulting Defendant pursuant to Rule 55(b)(2). In granting its request, Plaintiff asks the Court to award the following: (1) \$5,000 in statutory damages against Defaulting Defendant for infringement of the Copyright Protected Image pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced treble statutory damages of \$15,000 for the infringed Copyright Protected Image based on Defaulting Defendant's 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) 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: February 25, 2026

Respectfully submitted,

By: /s/ Nazly A. Bayramoglu  
Nazly A. Bayramoglu (NM Bar No. 151569)  
**BAYRAMOGLU LAW OFFICES LLC**  
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nazly@bayramoglu-legal.com  
*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of February 2026, 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/ Nazly A. Bayramoglu  
Nazly A. Bayramoglu (NM Bar No. 151569)

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

Plaintiff,

v.

TICTICMISS Fashion,

Defendant.

**Case No. 1:25-cv-07242-MMP-JTG**

**Honorable Martha M. Pacold**

**Magistrate Jeffrey T. Gilbert**

**DECLARATION OF NAZLY A. BAYRAMOGLU IN SUPPORT OF  
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Nazly A. Bayramoglu, of the City of Henderson, in the State of Nevada, 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") against Defendant TICTICMISS Fashion (the "Defaulting Defendant").

3. I am an attorney at law, duly admitted to practice before the Courts of the State of New Mexico 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 matters within my own knowledge unless stated otherwise.

4. I hereby certify that the Defaulting Defendant (as defined in the accompanying Memorandum) have 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). Specifically, Defaulting Defendant was served with copies of the Summons and Complaint via electronic service authorized by the Court on January 20, 2026, which is reflected in the Return of Summons filed in this case. [Dkt. No. 40.] As of the filing of this Motion, approximately twenty-three (23) days have expired since electronic service was effectuated on the Defaulting Defendant. Defaulting Defendant has not answered or otherwise responded to Plaintiff's Complaint in this action.

5. Plaintiff's asserted claims for relief in this action involve the intentional, willful infringement of the following federally registered copyright protected image: VA0002379907 (the "Copyright Protected Image").

6. As alleged in the Complaint, the Defaulting Defendant has displayed, without authorization, the Copyright Protected Image on the Amazon.com online sales platform (the "Platform") to market and sell knockoff, counterfeit products resembling Plaintiff's authentic Rotita brand products through their online store (the "Online Store"), 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 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. 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. 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 counterfeit

network to actively monitor and post information on the Plaintiff's pending cases on the website www.SellerDefense.cn. This has apparently been done to advise 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 an overall strategy by all non-appearing defendants, including the Defaulting Defendant, to simply cut their losses where Plaintiff has a high likelihood of success, abandon any online platform restrained funds, 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 Image.

10. Such an award precludes the Defaulting Defendant from shielding themselves from monetary responsibility for the collective infringement of common Copyright Protected Image. *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 their infringement of the Copyright Protected Image.

11. Plaintiff has alleged, and has offered proof, that the Defaulting Defendant has not only engaged in the infringement of the Copyright Protected Image, but they have done so through a highly sophisticated counterfeit network. Moreover, the basic nature of the copyright infringement scheme employed demonstrates that the Defaulting Defendant not only knew of the impropriety of their conduct but had to implement their counterfeit 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 image and offer it for sale through their online store.

12. The presented facts not only establish the Defaulting Defendant's knowledge and intentional infringement of Plaintiff's Copyright Protected Image. Accordingly, Plaintiff should be awarded statutory damages as described in **Exhibit 1** to this Declaration, with treble the enhancement against Defaulted Defendant based on their willful infringement of the Copyright Protected Image.

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 Asia. 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: February 25, 2026

By: /s/ Nazly A. Bayramoglu  
Nazly A. Bayramoglu (NM Bar No. 151569)  
**BAYRAMOGLU LAW OFFICES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of February 2026, 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/ Nazly A. Bayramoglu  
Nazly A. Bayramoglu (NM Bar No. 151569)

# Exhibit 1

Defaulted Defendant 1:25-cv-07242-MMP

<b>No.</b>	<b>Amazon Store Name/Defendant</b>	<b>Amazon Seller ID</b>	<b>Copyright Infringement</b>	<b>Statutory Amount Requested</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
1	TICTICMISS Fashion	AGTLIJLGKWNXN	VA0002379907	\$5,000	<b>\$15,000</b>

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
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CO. LIMITED,

Plaintiff,

v.

TICTICMISS Fashion,

Defendant.

**Case No. 1:25-cv-07242-MMP-JTG**

**Honorable Martha M. Pacold**

**Magistrate Jeffrey T. Gilbert**

**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 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 an extremely 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, Alibaba, Temu, eBay, Aliexpress, and Amazon (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 TICTICMISS Fashion (the “Defaulting Defendant”) in this action. The Defaulting Defendant is accused of intentionally and willfully infringing Plaintiff’s federally registered copyright asserted in this action: VA0002379907 (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 Image. In this regard, Plaintiff’s Copyright Protected Image, often representing recent product releases, have almost instantaneously appeared on the Defaulting Defendant’s online store maintained with the Platform (the “Online Store”). Moreover, the Defaulting Defendant has unquestionably been operating their Online Store using the misappropriated Copyright Protected Image through a sophisticated counterfeit network utilizing a highly developed supply chain capable of supplying thousands of knockoff 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 their conduct but had to implement their counterfeit 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 image and offer it for sale through their Online Store.

9. The Defaulting Defendant has intentionally used the Copyright Protected Image for soliciting counterfeit, knockoff 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 image and imbedding the term "Rotita" in their Amazon.com search engine optimization. Doing so causes their online store to be displayed whenever someone searches for "Rotita" on Amazon.com despite Plaintiff not selling authentic "Rotita" brand products on the platform. Based on the foregoing, I would estimate that the Defaulting Defendant's Online Store operates 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 Store 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 the company's copyright infringement enforcement action is engaged in the practice of copying Plaintiff's copyright protected product image almost instantaneously after it was first displayed on the company's website and then associating this image with the sale and promotion of unauthorized, counterfeit 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 the company's copyright protected image, without authorization, from its website or such unauthorized image is being provided by the same common source associated with manufacturing the counterfeit products being sold on the Defaulting Defendant's Platform storefront.

13. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendant's unauthorized use of its federally registered copyright protected image 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 February 25, 2026, in Hong Kong.

By: */s/ Liangjie Li*  
LIANGJIE LI

**CERTIFICATE OF SERVICE**

I hereby certify that on the 25th day of February 2026, 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, Amazon.

By: /s/ Nazly A. Bayramoglu  
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