

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

Michael Barcohana,

Plaintiff,

v.

YANAN's sweet sleep,

Defendant.

**Case No. 1:25-cv-10582-MMP-JTG**

**Honorable Martha M. Pacold**

**Magistrate Jeffrey T. Gilbert**

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

Plaintiff Michael Barcohana ("Plaintiff") hereby moves for entry of Default Judgment against Defendant YANAN's sweet sleep ("Defendant") pursuant to Federal Rule of Civil Procedure 55(b)(2). Plaintiff files a Memorandum of Law in support and Declaration of Joseph W. Droter. Plaintiff's Motion for Default Judgment disposes of the case.

DATED: February 10, 2026

Respectfully submitted,

By: /s/ Joseph W. Droter

Joseph W. Droter (Bar No. 6329630)

Katherine M. Kuhn (Bar No. 6331405)

**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

joseph@bayramoglu-legal.com

katherine@bayramoglu-legal.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, TikTok.

By: /s/ Joseph W. Droter  
Joseph W. Droter (Bar No. 6329630)

Store Name	Mall ID	Email
YANAN’s sweet sleep	7496157979132594698	3910529826@qq.com

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Michael Barcohana,

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YANAN's sweet sleep,

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**Case No. 1:25-cv-10582-MMP-JTG**

**Honorable Martha M. Pacold**

**Magistrate Jeffrey T. Gilbert**

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

Plaintiff, Michael Barcohana, ("Plaintiff") hereby submits this Memorandum of Law in support of his Motion for Default Judgment (the "Motion") pursuant to Federal Rule of Civil Procedure 55(b)(2) ("Rule 55") against Defendant, YANAN's sweet sleep (the "Defaulting Defendant" or "Defendant"). Plaintiff's Motion is based on this Memorandum of Law, the Joseph W. Droter Declaration ("Droter Declaration"), and the papers and pleadings on file in this case. Plaintiff's Motion for Default Judgment disposes of the case.

**I. INTRODUCTION**

Plaintiff's request for default judgment is straightforward; the Court authorized electronic service of process on the Defendant in this matter on December 23, 2025 [Dkt. No. 31]. Plaintiff effectuated service on Defendant and filed a Return of Service on December 30, 2025 [Dkt. No. 34]. As set forth in the docket entry for the Return of Service, a response to Plaintiff's First Amended Complaint was due on or before January 20, 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 First

Amended Complaint in this case. As of the filing of this Motion, more than twenty-one (21) days have passed since electronic service was made on the Defendant. (Droter Decl. ¶ 6.) To date, Defendant has failed to answer or otherwise respond to the First Amended Complaint or appear in the action. (*Id.* ¶ 7). Entry of Default under Rule 55(a) was granted on February 9, 2026 [Dkt. No. 39]

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. 13]. These asserted counts include claims for Trademark Infringement and Counterfeiting (Count I), False Designation of Origin (Count II), and Violation of the Illinois Uniform Deceptive Trade Practices Act (Count III).

In connection with its claims for relief, Plaintiff seeks an award of \$50,000 statutory damages under 15 U.S.C. § 1117(c) against the Defaulting Defendant, which should be enhanced due to their willful infringement of the Queen Tape Trademark, as evidenced by United States Registration Certificate 7,824,763 (the "Brand Trademark"). Plaintiff also requests that the Court issue a permanent injunction against the Defaulting Defendant. *See* 15 U.S.C. § 1116(d).

As alleged in the First Amended Complaint, the Defaulting Defendant has offered for sale and/or sold products through the unauthorized use of the Brand Trademark (the "Counterfeit Products") on Defendant's online storefront on TikTok (the "Platform") to market and sell counterfeit products resembling Plaintiff's authentic Queen Tape brand products, thereby deceiving consumers about the quality, nature, and source of the goods being purchased. [Dkt. No. 13-2]. These facts clearly show that the Defaulting Defendant has willfully and intentionally infringed on Plaintiff's Brand Trademark, supporting the Plaintiff's request for enhanced statutory damages.

Procedurally, Rule 55(b)(2) provides for a court-ordered default judgment that establishes, as a matter of law, that defendants are 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 deemed true and may not be challenged, and the defendants are liable as a matter of law for each cause of action alleged. *Black v. Lane*, 22 F.3d 1395, 1399 (7th Cir. 1994). The plaintiff meets the requirements for entry of the requested default judgment under Rule 55(b)(2).

Plaintiff respectfully requests that the Court to award the following: (1) statutory damages of \$50,000.00 against Defaulting Defendant based on their willful infringement pursuant to 15 U.S.C. § 1117(c); (2) issuance of a permanent injunction against the Defaulting Defendant pursuant to 15 U.S.C. § 1116; and (3) such other relief as the Court deems just and proper.

## **II. 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. 13 at 1-2.] 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. 13 at 3-4]; *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 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 who 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.

More than twenty-one (21) days have passed since Defendant was served, and the Defaulting Defendant has filed no answer or other responsive pleading. *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 Counterfeiting, False Designation of Origin, and Violation of the Illinois Uniform Deceptive Trade Practices Act as asserted in the First Amended Complaint. [Dkt. No. 13]

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 \$50,000 statutory damages pursuant to 15 U.S.C. § 1117(c)(1); (2) an award of enhanced statutory damages for willful infringement pursuant to 15 U.S.C. § 1117(c)(2); (3) entry of a permanent injunction pursuant to 15 U.S.C. § 1116(d); 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 Brand Trademark; (2) is liable for False Designation of Origin; (3) and is liable for the violation of the Illinois Uniform Deceptive Trade Practices Act. As such, the only the following issues remain to be adjudicated through the Motion: (1) Plaintiff's entitlement to an award of statutory damages for infringement of the Brand Trademark; (2) the request that any statutory damage award be enhanced based on the Defaulting Defendant's willful trademark infringement; and (3) the Plaintiff's right to issuance of a permanent injunction against the Defaulting Defendant.

**1. Plaintiff is entitled to statutory damages under 15 U.S.C. § 1117(c).**

Turning first to the request for an award of \$50,000 statutory damages under 15 U.S.C. § 1117(c) against the Defaulting Defendant. Plaintiff is entitled to such relief for the Defaulting Defendant's infringement of Plaintiff's Brand Trademark, which it maintains was done willfully and intentionally. [Dkt. No. 13]

Pursuant to the statutory damages provision of the Lanham Act, 15 U.S.C. § 1117(c), a plaintiff in a case involving the use of a counterfeit mark may elect to receive "not less than \$1,000 or more than \$200,000 per counterfeit mark per type of goods or services sold, offered for sale, or distributed, as the court considers just." 15 U.S.C. § 1117(c)(1). When the counterfeiting is found to be willful, 15 U.S.C. § 1117(c)(2) provides for statutory damages of up to "\$2,000,000 per counterfeit mark per type of goods or services sold, offered for sale, or distributed, as the court considers just." 15 U.S.C. § 1117(c)(2). "[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). Courts have also recognized that statutory damages can be awarded without the need for an evidentiary hearing. *See Lorillard Tobacco Co. v. Montrose Wholesale Candies & Sundries, Inc.*, 2008 U.S. Dist. LEXIS 31761, \*11 (N.D. Ill. Apr. 17, 2008).

Although 15 U.S.C. § 1117(c) specifies the dollar range for possible statutory damages, the only guidance the statute offers for determining an award within that range is “as the court considers just.” 15 U.S.C. § 1117(c). Courts interpreting this section have compared it to the statutory damage provision in the Copyright Act, found in 17 U.S.C. § 504(c). *See Lorillard Tobacco Co.*, 2004 U.S. Dist. LEXIS 22563, \*10; *Sara Lee v. Bags of New York, Inc.*, 36 F. Supp. 2d 161, 166 (S.D.N.Y. 1999). In *Sara Lee*, 36 F. Supp. 2d at 170, the court awarded \$750,000 in statutory damages after estimating the defendants' illicit gains and tripling the amount to "deter and punish a willful continuous course of infringements and defiance of the judicial process." The *Sara Lee* analysis considered seven factors: (1) the profits made by the defendants; (2) the revenues lost by the plaintiff; (3) the value of the mark; (4) the deterrent effect on others; (5) whether the conduct was innocent or willful; (6) whether a defendant has cooperated in providing records; and (7) the deterrent effect on the defendant.

In similar cases involving intentional Internet-based counterfeiting, courts in this district have awarded substantial damages, including the maximum permitted by law, to the plaintiff to achieve the following objectives: (1) discourage the defendant and others like him from introducing counterfeit goods into the market, (2) compensate the plaintiff for damages caused by the defendant's infringement, and (3) appropriately punish the defendant for his counterfeiting activities. *See, e.g., Burberry Limited, et al. v. The Partnerships And Unincorporated Associations Identified On Schedule "A"*, No. 1:14-cv-04824 (N.D. Ill. Sep. 25, 2014) (unpublished) (Docket

No. 38) (awarding \$2,000,000 in statutory damages per defendant); *Calvin Klein Trademark Trust et al. v. Chen Xiao Dong, et al.*, No. 15-cv-2224 (N.D. Ill. May 12, 2015) (unpublished) (Docket No. 45) (awarding \$2,000,000 in statutory damages per defendant.)

First, the Defaulting Defendant was notified of these proceedings and, apparently, deliberately chose not to appear and defend. (Droter Decl. ¶ 7). Due to the Defaulting Defendant's intentional decision not to participate, Plaintiff has been deprived of a meaningful opportunity to evaluate the true extent of its damages. (*Id.*). An essential factor is whether infringing sales took place online, as Internet sales tend to increase the award amount by making the infringement more widely accessible. The third-party Platform, TikTok, has provided limited sales information across Defendant's three (3) infringing links. (Droter Decl. ¶ 9). Defendant has sold approximately fourteen (14) units of infringing products for an estimated \$58.83. (*Id.*) Defendant themselves would have the most accurate sales information, but since they have chosen to not participate in this action, Plaintiff has been deprived of a meaningful opportunity to evaluate the true extent of its damages. The lack of complete information about Defaulting Defendant's sales and profits makes statutory damages particularly appropriate for default cases like this one. *See Petmed Express, Inc. v. medpets.com, Inc.*, 336 F. Supp. 2d 1213, 1220 (S.D. Fla. 2004).

Next, the circumstances of the Defaulting Defendant's infringement clearly justify awarding an enhanced statutory damages award against them. Simply put, the Defaulting Defendant's infringing conduct in this case is unquestionably willful, which warrants additional damages under 15 U.S.C. § 1117(e).

Unquestionably, the Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Brand Trademark, which is assumed through default. "Willful infringement may be attributed to the defendant's actions when he had knowledge that his conduct

constituted infringement or showed a reckless disregard for the owner's rights." *Lorillard Tobacco Co. v. S & M Cent. Serv. Corp.*, 2004 LEXIS 22563, \*19-20 (N.D. Ill. Feb. 25, 2005). Therefore, direct proof of knowledge is unnecessary, as it can be inferred from a defendant's conduct. *Id.* at 20.

Finally, District Courts have deemed counterfeiting willful when defendants default. *See Estee Lauder Cosmetics Ltd. & Make-up Art Cosmetics Inc. v. Ali-Beauties Store Store, et al.*, No. 1:19-cv-04579 (N.D. Ill. Sept. 12, 2019) (unpublished) (Dkt. No. 49); *Bose Corp. v. Amilineinc, et al.*, No. 1:19-cv-05347 (N.D. Ill. Oct. 9, 2019) (unpublished) (Dkt No. 44); *Eye Safety Systems, Inc. v. ICN7085, et al.*, No. 1:19-cv-06005 (N.D. Ill. Nov. 19, 2019) (unpublished) (Dkt No. 49); *Levi Strauss & Co. v. Acinth Girl Hy Store, et al.*, No. 1:19-cv-06200 (N.D. Ill. Nov. 19, 2019) (unpublished) (Dkt. No. 48).

Courts in this district have also recognized the value of a plaintiff's brand and the efforts to protect, promote, and improve that brand when determining the appropriate dollar amount for damages. *Lorillard Tobacco Co.*, 2004 U.S. Dist. LEXIS 22563, \*16. Given the Court's clear discretion in setting the correct amount of statutory damages within the limits of 15 U.S.C. § 1117(c), additionally, the remedy mandated by the statute must offer a strong deterrent to prevent further infringing conduct. *See, Sands, Taylor & Wood v. Quaker Oats Co.*, 34 F.3d 1340, 1348 (7th Cir. 1994).

For example, in *Phillip Morris USA Inc. v. Marlboro Express*, the Court stated that due to "the size of the potential profit given the quantities of [counterfeit goods] involved, and the need for a substantial deterrent to future misconduct by Defendant and other counterfeit traffickers ... plaintiff is entitled to the maximum statutory award under 15 U.S.C. § 1117(c)(2)." 2005 U.S. Dist. LEXIS 40359, \*28 (E.D.N.Y. Aug. 26, 2005). The statutory amount requested here will

effectively deter Defendant and any other future counterfeit traffickers from attempting to illicitly use Plaintiff's mark.

Finally, in determining an appropriate damages award, this Court should be guided by the *Lorillard* case and consider the "significant value of [the Plaintiff] brand and the efforts taken to protect, promote, and enhance that brand." *Lorillard Tobacco Co.*, 2004 U.S. Dist. LEXIS 22563, \*16. Therefore, Plaintiff's request for a statutory damages award of fifty thousand dollars (\$50,000) against Defendant should be given favorable consideration, given the efforts to protect, promote, and enhance the Queen Tape brand.

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

Plaintiff is entitled to the entry of a permanent injunction against the Defaulting Defendant pursuant to Section 34 of the Lanham Act, 15 U.S.C. § 1116(a), which authorizes courts to grant injunctive relief "according to the principles of equity and upon such terms as the court may deem reasonable" to prevent trademark infringement.

In determining whether permanent injunctive relief is appropriate, courts apply the four-factor test articulated in *eBay Inc. v. MercExchange, L.L.C.*, 547 U.S. 388, 391 (2006), requiring a plaintiff to demonstrate: (1) irreparable injury; (2) inadequacy of remedies at law; (3) that the balance of hardships favors injunctive relief; and (4) that the public interest would not be disserved by a permanent injunction. Each factor weighs strongly in Plaintiff's favor.

First, Plaintiff has suffered irreparable harm as a result of the Defaulting Defendant's unauthorized use of Plaintiff's federally registered trademarks. Trademark infringement causes loss of control over a brand's reputation and goodwill, which constitutes irreparable harm. *Ty, Inc. v. Jones Grp., Inc.*, 237 F.3d 891, 902 (7th Cir. 2001); *Promatek Indus., Ltd. v. Equitrac Corp.*,

300 F.3d 808, 813 (7th Cir. 2002). The Defaulting Defendant's failure to appear further demonstrates a substantial likelihood of continued infringement absent injunctive relief.

Second, remedies at law are inadequate. Courts in this District routinely find monetary relief inadequate in such circumstances in trademark infringement cases because such damages fail to address the harm to the plaintiff's business reputation and goodwill, as well as the difficulty in proving the precise measure of damages caused by the infringement. See *Unique Concepts, Inc. v. Manuel*, 1986 U.S. Dist. LEXIS 22765, at \*57 (N.D. Ill. July 15, 1986). Because the Defaulting Defendant has failed to participate in this action, Plaintiff cannot determine the full scope of infringing sales or prevent Defendant from continuing infringement through new or replacement online storefronts.

Third, the balance of hardships favors Plaintiff. Plaintiff seeks only to prohibit unlawful conduct, namely the continued infringement of its trademark. The Defaulting Defendant has no legitimate interest in using Plaintiff's marks without authorization.

Finally, the public interest strongly favors the issuance of a permanent injunction. The Lanham Act was enacted to protect consumers from deception and confusion and to safeguard the integrity of valid trademarks. Enjoining the Defaulting Defendant's infringing conduct advances these objectives by preventing consumer confusion and promoting fair competition in the marketplace. the public interest favors injunctive relief because preventing consumer confusion and deception is a central purpose of the Lanham Act. *Eli Lilly & Co. v. Natural Answers, Inc.*, 233 F.3d 456, 469 (7th Cir. 2000).

When a [intellectual property] plaintiff establishes a "threat of continuing infringement," it is entitled to an injunction. *Microsoft Corp. v. V3 Sols., Inc.*, 2003 U.S. Dist. LEXIS 15008, at \*50 (N.D. Ill. Aug. 27, 2003). Defendant will likely continue its infringement, open new stores, and

continue its willful use of Plaintiff's mark if permanent injunction is not entered here. Accordingly, because the Defaulting Defendant has defaulted and there is a strong likelihood of continued infringement, entry of a permanent injunction is appropriate and warranted under 15 U.S.C. § 1116(a).

### III. 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) statutory damages of \$50,000.00 against Defaulting Defendant based on their willful infringement pursuant to 15 U.S.C. § 1117(c); (2) issuance of a permanent injunction against the Defaulting Defendant pursuant to 15 U.S.C. § 1116; and (3) such other relief as the Court deems just and proper.

DATED: February 10, 2026

Respectfully submitted,

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

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, TikTok.

By: /s/ Joseph W. Droter  
Joseph W. Droter (Bar No. 6329630)

<b>Store Name</b>	<b>Mall ID</b>	<b>Email</b>
YANAN’s sweet sleep	7496157979132594698	3910529826@qq.com

**IN THE UNITED STATES DISTRICT COURT  
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Michael Barcohana,

Plaintiff,

v.

YANAN's sweet sleep,

Defendant.

**Case No. 1:25-cv-10582-MMP-JTG**

**Honorable Martha M. Pacold**

**Magistrate Jeffrey T. Gilbert**

**DECLARATION OF JOSEPH W. DROTER, ESQ. IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT**

I, Joseph W. Droter, Esq., of Chicago, 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. I make this declaration in support of Plaintiff's Motion for Default and Default Judgment.

2. On September 5, 2025, Plaintiff filed its First Amended Complaint [Dkt. No. 13] against Defendant YANAN's sweet sleep ("Defendant" or "Defaulting Defendant").

3. Defendant was served with copies of the Summons and First Amended Complaint via electronic service authorized by the Court on December 30, 2025, which is reflected in the Return of Service filed in this case [Dkt. No. 34].

4. The deadline to respond to the Complaint was January 20, 2026.

5. The Defendant has not been granted an extension of time to respond to the Complaint.

6. As of the filing of this Motion, more than twenty-one days (21) have expired since electronic service was effectuated on Defendant.

7. Defendant has failed to answer or otherwise respond to the Complaint or appear in the action. Due to the Defaulting Defendant's intentional decision not to participate, Plaintiff has been deprived of a meaningful opportunity to evaluate the true extent of its damages.

8. The Defaulting Defendant's email contact information provided by TikTok is: 3910529826@qq.com

9. I have reviewed the limited sales data provided by TikTok for Defendant's three (3) infringing products offered for sale. Defendant has sold approximately fourteen (14) units of infringing products for an estimated \$58.83.

10. 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 likely domiciled in Asia. As such, I am informed and believe that the Defaulting Defendant is not an active-duty member of the U.S. armed forces.

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

Executed on February 10, 2026, in Chicago, Illinois.

Respectfully Submitted

By: /s/ Joseph W. Droter  
JOSEPH W. DROTER, ESQ.

**CERTIFICATE OF SERVICE**

I hereby certify that on the 10th 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, TikTok.

By: /s/ Joseph W. Droter  
Joseph W. Droter (Bar No. 6329630)

<b>Store Name</b>	<b>Mall ID</b>	<b>Email</b>
YANAN's sweet sleep	7496157979132594698	3910529826@qq.com