

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

Michael Barcohana,

Plaintiff,

v.

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

Defendants.

**Case No. 1:25-cv-10740-CPK-MDW**

**Honorable Charles P. Kocoras**

**Magistrate M. David Weisman**

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT  
AGAINST THE IDENTIFIED SCHEDULE "A" DEFENDANTS**

Plaintiff Michael Barcohana ("Plaintiff") hereby moves for entry of Default and Default Judgment against the Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified in Schedule A ("Defendants"). Plaintiff files a Memorandum of Law in support and the Declaration of Joshua H. Sheskin. Plaintiff's Motion for Entry of Default and Default Judgment disposes of the case.

DATED: November 11, 2025

Respectfully submitted,

By: a /s/ Joshua H. Sheskin  
Joshua H. Sheskin (FL Bar No. 93028)  
**BAYRAMOGLU LAW OFFICES** |  
233 S. Wacker Drive, 44<sup>th</sup> Floor, #57  
Chicago, IL 60606  
Tel: (702) 462-5973 Fax: (702) 553-3  
Joshua@bayramoglu-legal.com  
*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of November 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>.

By: /s/ Joshua H. Sheskin  
Joshua H. Sheskin (FL Bar No. 93028)

No.	Defendant	Contact
1	Bruce Anli SHOP	w17750107873@88.com
2	Chenterr	yuweizhu04@gmail.com
3	glam auro Accs	pqd052167@163.com
4	Pavillian Shop	royautedesigns@gmail.com
5	Prime Smart Goods	yks7890yks@outlook.com
6	Scientific Sleep	w17750107873@88.com
7	Sleep Zebra	shoplucatech@gmail.com
8	Yilift	3949690954@qq.com

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THE INDIVIDUALS, CORPORATIONS,  
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ASSOCIATIONS IDENTIFIED IN  
SCHEDULE "A" HERETO,

Defendants.

**Case No. 1:25-cv-10740-CPK-MDW**

**Honorable Charles P. Kocoras**

**Magistrate M. David Weisman**

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR ENTRY  
OF DEFAULT AND DEFAULT JUDGMENT AGAINST DEFENDANT NO. 12**

Plaintiff, Michael Barcohana, ("Plaintiff") hereby submits this Memorandum of Law in support of his Motion for Entry of Default and Default Judgment (the "Motion") pursuant to Federal Rule of Civil Procedure 55 ("Rule 55") against the Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations listed in Schedule A (the "Defaulting Defendants" or "Defendants"). Plaintiff's Motion is based on this Memorandum of Law, the Joshua H. Sheskin Declaration ("Sheskin Decl."), and the papers and pleadings on file in this case. Plaintiff's Motion for Entry of Default and Default Judgment disposes of the case.

**I. INTRODUCTION**

Plaintiff's request for entry of default is straightforward; the Court authorized electronic service of process on the Defendants via email, along with issuing a Temporary Restraining Order (the "TRO") in this matter on September 15, 2025 [Dkt. Nos. 17, 18 and 19]. Plaintiff effectuated service on Defendants and filed a Return of Service on October 13, 2025 [Dkt. No. 30]. As set

forth in the docket entry for the Return of Service, a response to Plaintiff's operative Complaint was due on or before November 3, 2025.

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A) ("Rule 12(a)(1)(A)"), the Defaulting Defendants had twenty-one (21) days to answer or otherwise respond to Plaintiff's Complaint in this case. As of the filing of this Motion, approximately twenty-eight (28) days have passed since electronic service was effectuated on the Defendants. (Sheskin Decl. ¶ 3.) To date, the Defaulting Defendants have not answered or otherwise responded to Plaintiff's Complaint. (*Id.*). Therefore, the Clerk of the Court is required to enter default against the Defaulting Defendants under Rule 55(a).

Pursuant to Rule 55(b)(2), Plaintiff now also respectfully moves this Court for entry of a Default Judgment finding the Defaulting Defendants liable on all counts asserted in Plaintiff's Complaint. [Dkt. No. 1]. These asserted counts include claims for Trademark Infringement and Counterfeiting (Count I) 15 U.S.C. § 1114, False Designation of Origin (Count II) 15 U.S.C. § 1125(a), and Violation of Illinois Uniform Deceptive Trade Practices Act (Count III) 815 ILCS § 510/1, et seq.

In connection with its claims for relief, Plaintiff seeks an award of statutory damages under 15 U.S.C. § 1117(c) against the Defaulting Defendants, 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 Defendants. *See* 15 U.S.C. § 1116(d). Alternatively, Plaintiff requests a permanent injunction based on the Defaulting Defendants' willful violation of the Uniform Deceptive Trade Practices Act.

As alleged in the Complaint, the Defaulting Defendants have offered for sale and/or sold products, including mouth tape for sleep and health benefits, through the unauthorized use of Plaintiff's Queen Tape Trademark (the "Counterfeit Products") on the TikTok online sales platform (the "Platform") to market and sell counterfeit products resembling Plaintiff's authentic Queen Tape brand products, thereby likely to cause confusion and deceiving consumers about the quality, nature, and source of the goods being purchased. [Dkt. No. 15-2]. Additionally, the Defaulting Defendants are accused of operating as part of a coordinated, sophisticated counterfeit network that uses a common supply chain and manufacturing source to fulfill orders for counterfeit Queen Tape brand products. [Dkt. No. 15-2]. These facts clearly show that the Defaulting Defendants have willfully and intentionally infringed on Plaintiff's Queen Tape 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).

## **II. ARGUMENT**

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

This Court has original subject matter jurisdiction over the claims in this case under the Lanham Act, 15 U.S.C. § 1051 et seq., 28 U.S.C. §§ 1338(a)-(b), and 28 U.S.C. § 1331. Venue is proper in this Court under 28 U.S.C. § 1391, and the Court can exercise personal jurisdiction over

Defendants because they directly target business activities at consumers in Illinois and cause harm to the Plaintiff's business within this district. [*Id.*]; *see also uBID, Inc. v. GoDaddy Grp., Inc.*, 623 F.3d 421, 423-24 (7th Cir. 2010) (without an evidentiary hearing, the plaintiff only needs to make a prima facie case for personal jurisdiction; all offered facts should be accepted as true, and factual disputes 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 Defendants, in issuing the TRO on September 15, 2025 [Dkt. No. 18]. Moreover, the Court additionally issued a Preliminary Injunction on October 20, 2025, further solidifying this determination. [Dkt. No. 34]. Accordingly, it is unquestionable that the Defaulting Defendants are 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).

On September 5, 2025, the Plaintiff filed its Complaint in this case, alleging, among other claims, Trademark Infringement and Counterfeiting (Count I) 15 U.S.C. § 1114, False Designation of Origin (Count II) 15 U.S.C. § 1125(a), and Violation of Illinois Uniform Deceptive Trade Practices Act (Count III) 815 ILCS § 510/1, et seq., as stated in the Complaint. [Dkt. No. 1]. The Defendants, who were properly served with the Complaint, TRO, and all supporting documents via electronic service on October 13, 2025 [Dkt. No. 30], were explicitly required to answer or respond to the Complaint by November 3, 2025 [*Id.*] Accordingly, the Defaulting Defendants had twenty-one (21) days to respond to the Complaint under Rule 12(a)(1)(A). As of the filing of this Motion, approximately twenty-eight (28) days have passed since the Defendants were served.

(Sheskin Decl. ¶ 4.) To date, the Defaulting Defendants have not answered or responded to the Complaint. (*Id.*) Therefore, the Court's Clerk is compelled to enter default and default judgment against the Defaulting Defendants under Rule 55.

**C. 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 Defendants were served, and the Defaulting Defendants have 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 Trademark Infringement and Counterfeiting, False Designation of Origin, and violation of the Uniform Deceptive Trade Practice Act as asserted in the Complaint. [Dkt. No. 1.]

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 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.

**D. Plaintiff is Entitled to the Relief Requested.**

Through entry of default, Plaintiff has established that the Defaulting Defendants: (1) are liable for intentionally and willfully infringing the Queen Tape Trademark; (2) are liable for False Designation of Origin; and (3) have willfully violated 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 Queen Tape Trademark; (2) the request that any statutory damage award be enhanced based on the Defaulting Defendants' willful trademark infringement; and (3) the Plaintiff's right to issuance of a permanent injunction against the Defaulting Defendants.

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

Turning first to the request for an award of statutory damages under 15 U.S.C. § 1117(c) against the Defaulting Defendants. Plaintiff is entitled to such relief for the Defaulting Defendants' infringement of Plaintiff's Queen Tape Trademark, which it maintains was done willfully and intentionally. [Dkt. No. 1]

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).

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.

First, the Defaulting Defendants were notified of these proceedings and, apparently, deliberately chose not to appear and defend. (Sheskin Decl. ¶ 7). Due to the Defaulting Defendants' intentional decision not to participate, Plaintiff has been deprived of a meaningful opportunity to evaluate the true extent of its damages. (*Id.*).

Finally, 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 lack of information about Defaulting Defendants' 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).

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).

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

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

Unquestionably, the Defaulting Defendants have engaged in the intentional misappropriation and unauthorized use of the Queen Tape 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.

Furthermore, the Defaulting Defendants have clearly been running their online stores using the misappropriated Queen Tape Trademark through a sophisticated counterfeit network with a highly developed supply chain capable of delivering thousands of counterfeit products, as alleged in the Complaint.

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).

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 them 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.)

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). Plaintiff respectfully requests the Court to award one hundred thousand dollars (\$100,000).

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 Defendants 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).

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, the Plaintiff’s request for a statutory damages award of one hundred thousand dollars (\$100,000) per Defendant should be given favorable consideration, given the efforts to protect, promote, and enhance the Queen Tape brand. Attached as **Exhibit 1** to the Declaration of Joshua H. Sheskin is each Defendant, their store identification, product code identification and requested amounts for each Defendant’s infringement.

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

Next, Plaintiff is entitled to entry of a permanent injunction against the Defaulting Defendants. This request is justified under either 15 U.S.C. § 1116 or under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3.

First, the Court has already concluded that the Plaintiff is entitled to preliminary injunctive relief in this case, including issuance against the Defaulting Defendants. Nothing has happened since the entry of the preliminary injunction that would alter or prevent the issuance of a permanent injunction against the Defaulting Defendants who are not participating. In short, the key fact that justified issuing temporary injunctive relief remains unchallenged by the Defaulting Defendants. Therefore, the Plaintiff’s right to permanent injunctive relief under 15 U.S.C. § 1116 or the Uniform Deceptive Practices Act under 815 ILCS § 510/3 is uncontested and supported by the

substantial evidence previously presented when the preliminary relief was granted. Accordingly, the Plaintiff is entitled to a permanent injunction against the Defaulting Defendants.

### III. CONCLUSION

Based on the foregoing, Plaintiff respectfully requests entry of default and default judgment against the Defaulting Defendants pursuant to Rule 55. In granting its request, Plaintiff asks the Court to award the following: (1) statutory damages of \$100,000.00 per Defaulting Defendant based on their willful infringement pursuant to 15 U.S.C. § 1117(c); (2) issuance of a permanent injunction against the Defaulting Defendants pursuant to 15 U.S.C. § 1116 or under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3; and (3) such other relief as the Court deems just and proper.

DATED: November 11, 2025

Respectfully submitted,

By: a /s/ Joshua H. Sheskin  
Joshua H. Sheskin (FL Bar No. 93028)  
**BAYRAMOGLU LAW OFFICES** |  
233 S. Wacker Drive, 44<sup>th</sup> Floor, #57  
Chicago, IL 60606  
Tel: (702) 462-5973 Fax: (702) 553-3  
Joshua@bayramoglu-legal.com  
*Attorney for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of November 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>.

By: /s/ Joshua H. Sheskin  
 Joshua H. Sheskin (FL Bar No. 93028)

<b>No.</b>	<b>Defendant</b>	<b>Contact</b>
1	Bruce Anli SHOP	w17750107873@88.com
2	Chenterr	yuweizhu04@gmail.com
3	glam auro Accs	pqd052167@163.com
4	Pavillian Shop	royautedesigns@gmail.com
5	Prime Smart Goods	yks7890yks@outlook.com
6	Scientific Sleep	w17750107873@88.com
7	Sleep Zebra	shoplucatech@gmail.com
8	Yilift	3949690954@qq.com

**IN THE UNITED STATES DISTRICT COURT  
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Michael Barcohana,

Plaintiff,

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THE INDIVIDUALS, CORPORATIONS,  
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SCHEDULE "A" HERETO,

Defendants.

**Case No. 1:25-cv-10740-CPK-MDW**

**Honorable Charles P. Kocoras**

**Magistrate M. David Weisman**

**DECLARATION OF JOSHUA H. SHESKIN, ESQ. IN SUPPORT OF  
PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT**

I, Joshua H. Sheskin, Esq., of Mt. Lebanon, Pennsylvania, declare as follows:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff, Michael Barcohana ("Plaintiff") in the above-captioned matter. I make this Declaration, which is filed in support of Plaintiff's Motion for Entry of Default and Default Judgment, and I could and would testify competently to the matters set forth herein.

2. On September 5, 2025, Plaintiff filed its Complaint and Jury Demand [Dkt. No. 1] against Defendants, The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified in Schedule A [Dkt. No. 1-2] (collectively, "Defendants").

3. On October 13, 2025, Defendants were served with their respective Summons and copies of the Complaint and accompanying Documents via electronic mail and website posting

pursuant to the Court's Order authorizing Service by Publication, Electronic Service and Expedited Discovery. (See Dkt. No. 30 Return of Service on file with the Court.)

4. The deadline to respond to the Complaint was November 3, 2025.

5. The Defendants have not been granted an extension of time to respond to the Complaint.

6. As of the filing of this Motion, approximately twenty-eight days (28) have expired since electronic service was effectuated on Defendants.

7. Defendants have failed to answer or otherwise respond to the Complaint or appear in the action.

8. The Defaulting Defendants' information and Plaintiff's requested Statutory Damages Amount is attached as **Exhibit 1**.

9. Servicemembers Civil Relief Act, 50 U.S.C. app. § 521(b):

a. I am unable to determine whether the Defaulting Defendants are in military service because the Defaulting Defendants' true identities are unknown.

b. Defaulting Defendants are believed to be individuals mainly from foreign countries or companies organized under foreign laws. While some have domestic addresses, it is thought that their main offices are in China or another foreign nation. Although the Plaintiff cannot be certain, the fact that the Defendants did not appear suggests that we have no confirmed address for them, as this information can only be obtained from the Defendants themselves, similar to many internet counterfeiters who lie about their location. Therefore, it is impossible to determine the Defendants' actual addresses, but they are likely foreign counterfeiters based on the typical sources of their goods. If they are foreign, then we know they are not U.S. service

members. However, on the unlikely chance that they are not foreign, there is no strong evidence to confirm whether they are in the service, because, except for one Defendant, they have not been in contact with the Plaintiff to date despite multiple attempts, including serving multiple documents.

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

Executed on November 11, 2025, in Mt. Lebanon, Pennsylvania.

Respectfully Submitted

By: /s/ Joshua H. Sheskin  
JOSHUA H. SHESKIN (FL BAR NO. 93028)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 11th day of November 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>.

By: /s/ Joshua H. Sheskin  
Joshua H. Sheskin (FL Bar No. 93028)

<b>No.</b>	<b>Defendant</b>	<b>Contact</b>
1	Bruce Anli SHOP	w17750107873@88.com
2	Chenterr	yuweizhu04@gmail.com
3	glam auro Accs	pqd052167@163.com
4	Pavillian Shop	royautedesigns@gmail.com
5	Prime Smart Goods	yks7890yks@outlook.com
6	Scientific Sleep	w17750107873@88.com
7	Sleep Zebra	shoplucatech@gmail.com
8	Yilift	3949690954@qq.com

# Exhibit 1

<b>Defendant Name and Contact</b>	<b>Seller ID</b>	<b>Counterfeit Product ID</b>	<b>Statutory Damages Requested</b>
Bruce Anli SHOP w17750107873@88.com	7496200017884580567	1731337055243244247	\$100,000.00
Chenterr yuweizhu04@gmail.com	7496016382078978934	1731389866476802934	\$100,000.00
glam auro Acces pqd052167@163.com	7495999892555074380	1730080234427814732	\$100,000.00
Pavillian Shop royautedesigns@gmail.com	7495801285591600121	1731167900252673017 1731167891172856825	\$100,000.00
Prime Smart Goods yks7890yks@outlook.com	7496235912044120189	1731554515159453821 1731584728538976381 1731581671586304125 1731554515159453821	\$100,000.00
Scientific Sleep w17750107873@88.com	7496099085839075958	1730882447366984310 1730839967120790134 1730765825020957302 1730839274869396086	\$100,000.00
Sleep Zebra shoplucatech@gmail.com	7495813707726556111	1731196097141511119	\$100,000.00
Yilift 3949690954@qq.com	7496271596411587501	1731523434312864685	\$100,000.00
<b>TOTAL:</b>			<b>\$800,000.00</b>