

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

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

Defendants.

**Case No. 1:25-cv-07743-SCS-JWA**

**Honorable Steven C. Seeger**

**Magistrate Jeannice W. Appenteng**

**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT AGAINST THE DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff") hereby moves for Default Judgment, Rule 55(b)(2) against the seven (7) Defaulting Defendants, The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A, listed below and separately listed in Exhibit 1 to the accompanying Declaration of Gokalp Bayramoglu (the "Bayramoglu Decl."). Plaintiff files a Memorandum of Law in support, Declaration of Gokalp Bayramoglu and Declaration of Liangjie Li. Plaintiff's Motion for Entry of Default and Default Judgment disposes of the case.

DATED: January 30, 2026

Respectfully Submitted,

By: /s/ Gokalp Bayramoglu  
Gokalp Bayramoglu (NV. Bar No. 15500)  
**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  
gokalp@bayramoglu-legal.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of January 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, Amazon.

By: /s/ Gokalp Bayramoglu  
Gokalp Bayramoglu (NV Bar No. 15500)

<b>Defendant No.</b>	<b>Seller's Name</b>	<b>Seller Contact</b>
<b>1</b>	Dengzhoushiximibaihuodian AG59YYIB2I20H	w15838707084@163.com
<b>2</b>	YUWYUO A1BRL72L0P77HP	xiaonaofuaqa@163.com
<b>3</b>	SUMBERY A1V1P7MVR9O7D5	susanklein987@hotmail.com
<b>4</b>	JHOKCI AMHK6JE7TEH16	yunshixungu6801@126.com
<b>5</b>	Clearance deals 2025 Unstoppable A2O1NPRRA9N6YG	restwork@163.com
<b>6</b>	Xingqiba AQH4JAV7FYQQS	43800386@qq.com
<b>7</b>	QinHuangDaoGuaBiGuShangMao A58Y48RSTWCQS	cereiob80214@163.com

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
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HONG KONG LEYUZHEN TECHNOLOGY  
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Plaintiff,

v.

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

Defendants.

**Case No. 1:25-cv-07743-SCS-JWA**

**Honorable Steven C. Seeger**

**Magistrate Jeannice W. Appenteng**

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR DEFAULT  
JUDGMENT AGAINST THE IDENTIFIED SCHEDULE A DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co., Limited ("Plaintiff") hereby submits this Memorandum of Law in support of its Motion for Default Judgment (the "Motion") pursuant to Federal Rule of Civil Procedure 55(b)(2) ("Rule 55") against Defendants 1-7. Plaintiff's Motion is based on this Memorandum of Law, the Declaration of Gokalp Bayramoglu, Esq. (the "Bayramoglu Decl."), the Declaration of Liangjie Li (the "Li Decl."), and the papers and pleadings on file in this case.

**I. INTRODUCTION**

On October 17, 2025, the Court authorized electronic service via email on Defendants [Dkt. No. 20]. Plaintiff completed service on all named Defendants and filed a Return of Service on October 17, 2025 [Dkt. No. 24]. The deadline to respond to the Complaint was November 7, 2025.

Plaintiff seeks an award of statutory damages under 17 U.S.C. § 504(c) against the Defaulting Defendants for infringing the Copyright Protected Images, which should be increased due to their willful infringement of the federally registered copyrights VA0002369378, VA0002379907, VA0002379930, VA0002381125, VA0002381840, VA0002381842, and VA0002384829 (the “Copyright Protected Images”). (Bayramoglu Decl. ¶ 6.) Plaintiff also requests that the Court issue a permanent injunction against the Defendants. See 17 U.S.C. § 502(a).

## II. LEGAL STANDARD

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), the Defaulting Defendants had twenty-one (21) days to answer or otherwise respond to the Complaint filed by the Plaintiff in this case. Fed. R. Civ. P. 12(a)(1)(A). Under Federal Rule of Civil Procedure 55(a), "when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default." Fed. R. Civ. P. 55(a).

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

### **III. FACTUAL BACKGROUND**

As alleged in the Complaint, the Defendants have publicly displayed unlicensed and unauthorized reproductions of Plaintiff's Copyright Protected Images on the internet to market and sell competing products using Plaintiff's authentic Copyright Protected Images, thereby deceiving consumers as to the quality, nature, and source of goods being purchased. (Bayramoglu Decl. ¶ 6.)

On January 5, 2026 Rule 55(a) Entry of Default was entered against the Defaulting Defendants [Dkt No. 31]. The Defendants had until January 12, 2026, to respond to Plaintiff's Motion for Default [Dkt. No. 31] Defaulting Defendants have not answered, appeared, or otherwise responded to Plaintiff's Complaint or Minute Entry Docket 31 (Bayramoglu Decl. ¶ 5.)

In this case, the Defaulting Defendants have willfully and intentionally infringed upon Plaintiff's Copyright Protected Images, as alleged in the complaint, supporting the Plaintiff's request for enhanced statutory damages.

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

### **IV. ARGUMENT**

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

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

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

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

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

A default judgment establishes, as a matter of law, that named, unresponsive defendants are liable for each cause of action alleged against them in the complaint. *Di Mucci*, 879 F.2d at 1497. When a court determines that a defendant is in default, the factual allegations of the complaint are taken as true and cannot be challenged. The Defendants are liable as a matter of law for each cause of action alleged in the complaint upon entry of default judgment. *Black*, 22 F.3d at 1399. Here, more than twenty-one (21) days have passed since the Defendants were served, and the Defaulting Defendants have not filed any answer or responsive pleading. Therefore, entering a default judgment is appropriate. *See* Fed. R. Civ. P. 12(a)(1)(A).

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

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

Plaintiff is entitled to such relief for the Defaulting Defendants' infringement of the Plaintiff's Copyright-Protected Images, which 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 not attributable to the infringement and are not taken into account in computing the actual damages. 17 U.S.C. § 504(b).

In establishing the infringer's profits, the copyright owner is required to present proof only of the infringer's gross revenue, and the infringer is required to prove his or her deductible expenses and the elements of profit attributable to factors other than the copyrighted work. 17 U.S.C. § 504(b). "[S]tatutory damages have been held to be appropriate on a motion for default judgment because the defaulting party has the information needed to prove actual damages." *White v. Marshall*, 771 F.Supp.2d 952, 956 (E.D. Wis. 2011); *see also Wondie v. Mekuria*, 742 F.Supp.2d 118, 124-25 (D.D.C. 2010); *Lifted Research Grp., Inc. v. Behdad, Inc.*, 591 F.Supp.2d 3, 8 (D.D.C. 2008).

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

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

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

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

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

Furthermore, while the Plaintiff can approximate the Defaulting Defendants' net profits from their infringing sales, this estimate is highly speculative. It cannot definitively account for the advertising expenses saved through the unauthorized use and display of the Plaintiff's Copyright-Protected Images, which it has produced at significant cost. (Li Decl. ¶ 10 & 11.)

Therefore, an award of statutory damages is appropriate because actual damages are nearly impossible to prove in this case. *See White*, 771d F.Supp.2d at 956.

Considering the circumstances and the Defaulting Defendants' conduct, the Plaintiff is entitled to statutory damages and an enhancement of statutory damages. Attached as Exhibit 1 to the Declaration of Gokalp Bayramoglu is Plaintiff's Damage Requests. In this case, the Defaulting Defendants were provided with notice of these proceedings and elected not to appear and defend. (Bayramoglu Decl. ¶8). As a result of the Defaulting Defendants' intentional decision not to appear and defend this action, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual damages. (*Id.*)

The plaintiff has invested substantial capital to secure the registration of the Copyright-Protected Images and to promote its brand in the United States and Illinois. (Li. Decl. ¶ 10 & 11.) This includes spending over \$80,000 on copyright registrations with the U.S. Copyright Office and approximately \$8,000,000 to \$12,000,000 annually on advertising and promoting its Rotita brand in the United States. (Li Decl. ¶ 10.) The significant investment in protecting the Rotita Brand justifies the plaintiff's request for statutory damages.

The Defaulting Defendants' infringement clearly supports awarding the requested statutory damage award against it. It is without question that the Defaulting Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright-Protected Images, which have then appeared on the Defaulting Defendants' online store. (Li Decl. ¶ 8.) Moreover, the Defaulting Defendants have unquestionably been operating their online stores using the misappropriated Copyright-Protected Images. These actions by the Defaulting Defendants justify an award of statutory damages. Plaintiff respectfully requests the Court award statutory damages for copyright

infringement under 17 U.S.C. § 504(c)(1) in the amount of \$5,000 per Defaulting Defendants, to be trebled for willful infringement. (Bayramoglu Decl. ¶ 11, Exhibit 1)

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

Here, the Defaulting Defendants' infringement clearly supports awarding an enhanced statutory damage award of at least treble damages against them. The Defendant's infringing conduct in this action is willful, thereby justifying enhanced damages under 17 U.S.C. § 504(c)(2). The defendant has engaged in the intentional misappropriation and unauthorized use of Copyright Protected Images. (Bayramoglu Decl. ¶¶ 10-11.)

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

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

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

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

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

Next, Plaintiff is entitled to the entry of a permanent injunction against the Defaulting Defendants pursuant to 17 U.S.C. § 502(a), which authorizes courts to “grant temporary and final injunctions on such terms as it may deem reasonable to prevent or restrain infringement of a copyright.”

In determining whether permanent injunctive relief is appropriate, courts apply the four-factor test set forth in *eBay Inc. v. MercExchange, L.L.C.*, 547 U.S. 388, 391 (2006), requiring a showing that: (1) Plaintiff has suffered an irreparable injury; (2) remedies available at law are inadequate to compensate for that injury; (3) the balance of hardships favors injunctive relief; and (4) the public interest would not be disserved by a permanent injunction. Each factor weighs decisively in favor of granting injunctive relief here.

First, Plaintiff has suffered and will continue to suffer irreparable harm absent injunctive relief. In *White v. Marshall*, the court noted that copyright infringement often constitutes

irreparable harm and that monetary damages are inadequate, justifying injunctive relief. *White v. Marshall*, 771 F. Supp. 2d 952. Additionally, courts have recognized a presumption of irreparable harm in copyright cases, further supporting the issuance of permanent injunctions. *See also In re Aimster Copyright Litig.*, 252 F. Supp. 2d 634. Here, the Defaulting Defendant has willfully reproduced and publicly displayed Plaintiff's Copyright Protected Images without authorization in connection with online product listings. (Kuhn Decl. ¶ 5.) Such conduct causes loss of control over Plaintiff's copyrighted works, damage to brand goodwill, and consumer confusion; harms that are inherently difficult to quantify and not fully compensable through monetary damages alone. Moreover, the Defaulting Defendant's failure to appear or participate in this action demonstrates a substantial risk of continued infringement absent court-ordered relief.

Second, legal remedies are inadequate. In cases where defendants fail to respond or appear, courts have consistently granted permanent injunctions as part of default judgments, particularly when there is evidence of ongoing or likely future infringement. *See Virgin Records Am. Inc. v. Johnson*, where the court granted a permanent injunction under § 502(a) due to the defendant's failure to respond and the likelihood of continued infringement, emphasizing the public interest in upholding copyright protections. 441 F. Supp. 2d 963. Because the Defaulting Defendant has elected not to appear, Plaintiff lacks any meaningful ability to monitor, deter, or prevent future infringement through monetary relief alone. Courts routinely recognize that where defendants operate anonymous or foreign-based online storefronts, monetary damages are insufficient to prevent continued unlawful conduct.

Third, the balance of hardships strongly favors Plaintiff. Plaintiff seeks only to prohibit the Defaulting Defendant from engaging in unlawful conduct, namely the unauthorized use and display of Plaintiff's copyrighted images. The Defaulting Defendant has no legitimate interest in

continuing infringing activities and therefore will suffer no cognizable hardship from compliance with a permanent injunction.

Finally, public interest is served by the enforcement of federal copyright laws and the prevention of consumer deception. Granting injunctive relief promotes respect for intellectual property rights and discourages future infringement, particularly in the online marketplace context.

Because the Defaulting Defendant has failed to respond, defend, or otherwise participate in this action, and because the record establishes a strong likelihood of continued infringement absent injunctive relief, entry of a permanent injunction is appropriate and warranted under 17 U.S.C. § 502(a). Accordingly, Plaintiff respectfully requests that the Court enter a permanent injunction prohibiting the Defaulting Defendant, and all persons acting in concert with it, from directly or indirectly infringing Plaintiff's copyrighted image.

**V. CONCLUSION**

Under Rule 55(b)(2), Plaintiff respectfully requests that this Court enter 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 Copyright Infringement (Count I) [Dkt. No. 1] In granting its request, Plaintiff asks the Court to award the following: (1) statutory damages for \$5,000 per infringement under 17 U.S.C. § 504(c)(1); (2) enhanced treble statutory damages based on willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) issuance of a permanent injunction against the Defendants pursuant to 17 U.S.C. § 502(a); and (4) such other relief as the Court deems just and proper.

DATED: January 30, 2026

Respectfully submitted,

By: /s/ Gokalp Bayramoglu  
Gokalp Bayramoglu (NV Bar No. 15500)  
**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  
gokalp@bayramoglu-legal.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of January 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, Amazon.

By: /s/ Gokalp Bayramoglu  
Gokalp Bayramoglu (NV Bar No. 15500)

<b>Defendant No.</b>	<b>Seller's Name</b>	<b>Seller Contact</b>
<b>1</b>	Dengzhoushiximibaihuodian AG59YYIB2I20H	w15838707084@163.com
<b>2</b>	YUWYUO A1BRL72L0P77HP	xiaonaofuaqa@163.com
<b>3</b>	SUMBERY A1V1P7MVR9O7D5	susanklein987@hotmail.com
<b>4</b>	JHOKCI AMHK6JE7TEH16	yunshixungu6801@126.com
<b>5</b>	Clearance deals 2025 Unstoppable A2O1NPRRA9N6YG	restwork@163.com
<b>6</b>	Xingqiba AQH4JAV7FYQQS	43800386@qq.com
<b>7</b>	QinHuangDaoGuaBiGuShangMao A58Y48RSTWCQS	cereiob80214@163.com

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

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

Defendants.

**Case No. 1:25-cv-07743-SCS-JWA**

**Honorable Steven C. Seeger**

**Magistrate Jeannice W. Appenteng**

**DECLARATION OF GOKALP BAYRAMOGLU IN SUPPORT OF  
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Gokalp 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 relies on my personal knowledge of the facts listed below. If called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of the Plaintiff's Motion Default Judgment Rule 55(b)(2) (the "Motion") against the Defendants The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A.

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

4. I hereby certify that the Defaulting Defendants 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).

5. Specifically, Defaulting Defendants were served with copies of the Summons and Complaint via electronic service, as authorized by the Court, on October 17, 2025, which is reflected in the Return of Summons filed in this case [Dkt. No. 24]. A Rule 55(a) Entry of Default was entered against the Defaulting Defendants on January 5, 2026 [Dkt No. 31]. The Defendants had until January 12, 2026, to respond to Plaintiff’s Motion for Default [Dkt. No. 31] Defaulting Defendants have not answered, appeared, or otherwise responded to Plaintiff’s Complaint or the Honorable Judge Seegar’s Minute Entry Docket 31.

6. Plaintiff’s asserted claims for relief in this action involve the intentional, willful infringement of the following federally registered copyright protected images; VA0002369378, VA0002379907, VA0002379930, VA0002381125, VA0002381840, VA0002381842, and VA0002384829 (the “Copyright Protected Images”).

7. As alleged in the Complaint, the Defaulting Defendants have displayed, without authorization, the Copyright Protected Images on Amazon.com (the “Platform”) to market and sell competing products resembling Plaintiff’s authentic Rotita brand items through their online stores (the “Online Store”), thereby deceiving consumers about the quality, nature, and source of the goods being purchased.

8. The Defendant was notified of these proceedings and, apparently, chose not to appear and defend itself. Due to the Defendants’ deliberate decision not to participate, Plaintiff cannot obtain complete sales information from them. As a result, Plaintiff has been deprived of a

meaningful opportunity to assess its actual damages accurately. This uncertainty supports Plaintiff's request for statutory damages against the Defaulting Defendants.

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

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

11. The facts presented not only demonstrate the Defaulting Defendants' knowledge and deliberate infringement of Plaintiff's Copyright-Protected Images. Therefore, Plaintiff should be awarded statutory damages, based on their intentional infringement of the Copyright-Protected Images. Plaintiff seeks \$5,000, trebled for enhanced willful infringement.

12. My office, with assistance from our client and those assisting our client, investigated the Defaulting Defendants' infringing activities, including attempts to identify their contact information. Our investigation confirmed that the Defaulting Defendants are domiciled in Asia. As such, I am informed and believe that the Defendants are not active-duty members of the U.S. armed forces.

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

Executed this 30th day for January 2026, in Henderson, Nevada.

By: /s/ Gokalp Bayramoglu  
Gokalp Bayramoglu (NV Bar No. 15500)  
**BAYRAMOGLU LAW OFFICES, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of January 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, Amazon.

By: /s/ Gokalp Bayramoglu  
Gokalp Bayramoglu (NV Bar No. 15500)

<b>Defendant No.</b>	<b>Seller's Name</b>	<b>Seller Contact</b>
1	Dengzhoushiximibaihuodian AG59YYIB2I20H	w15838707084@163.com
2	YUWYUO A1BRL72L0P77HP	xiaonaofuaqa@163.com
3	SUMBERY A1V1P7MVR9O7D5	susanklein987@hotmail.com
4	JHOKCI AMHK6JE7TEH16	yunshixungu6801@126.com
5	Clearance deals 2025 Unstoppable A2O1NPRRA9N6YG	restwork@163.com
6	Xingqiba AQH4JAV7FYQQS	43800386@qq.com
7	QinHuangDaoGuaBiGuShangMao A58Y48RSTWCQS	cereiob80214@163.com

# Exhibit 1

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A  
**1:25-cv-07743 7 Defaulting Defendants**

<b>No.</b>	<b>Store Name Store ID Contact</b>	<b>Copyright Infringed</b>	<b>Damages Requested</b>	<b>Enhanced for Willful Infringement</b>
<b>1</b>	Dengzhoushiximibaihuodian AG59YYIB2I20H w15838707084@163.com	VA0002384829	\$5,000	15,000
<b>2</b>	YUWYUO A1BRL72L0P77HP xiaonaofuaqa@163.com	VA0002379930	\$5,000	15,000
<b>3</b>	SUMBERY A1V1P7MVR9O7D5 susanklein987@hotmail.com	VA0002381840	\$5,000	15,000
<b>4</b>	JHOKCI AMHK6JE7TEH16 yunshixungu6801@126.com	VA0002369378	\$5,000	15,000
<b>5</b>	Clearance deals 2025 Unstoppable A2O1NPRRA9N6YG restwork@163.com	VA0002381842	\$5,000	15,000
<b>6</b>	Xingqiba AQH4JAV7FYQQS 43800386@qq.com	VA0002379907	\$5,000	15,000
<b>7</b>	QinHuangDaoGuaBiGuShangMao A58Y48RSTWCQS cereiob80214@163.com	VA0002381125	\$5,000	15,000
<b>TOTAL:</b>			<b>\$35,000.00</b>	<b>\$105,000.00</b>

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

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

Defendants.

**Case No. 1:25-cv-07743-SCS-JWA**

**Honorable Steven C. Seeger**

**Magistrate Jeannice W. Appenteng**

**DECLARATION OF LIANGJIE LI IN SUPPORT OF  
PLAINTIFF'S MOTION FOR 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 Judgment (the "Motion").

3. I am the Chief Operations Officer for Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("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 a well-known source of women’s clothing in the United States and has been the subject of rampant counterfeit sales through online platforms such as Alibaba, Walmart, Amazon, Temu, eBay, AliExpress, and TikTok (the “Platform”), which is the online sales platform at issue in this action. These are some of the largest online retailers in the World – and Plaintiff does not sell its products through any one of them. Rather, Plaintiff only sells its genuine Rotita brand products through its website rotita.com.

6. Plaintiff seeks an award of statutory damages against Defendants in this action. The Defaulting Defendants are accused of intentionally and willfully infringing Plaintiff’s copyrights, bearing the registrations: VA0002369378, VA0002379907, VA0002379930, VA0002381125, VA0002381840, VA0002381842, and VA0002384829 (the “Copyright Protected Images”).

7. It is without question that the Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. In this regard, Plaintiff’s Copyright Protected Images, often depicting recent product releases, have appeared on the Defendants’ Online Stores.

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

9. The Defendants have intentionally used Copyright Protected Images for soliciting sales of their competing products.

10. Plaintiff’s rough estimated gross revenue from United States sales likely exceeds \$20,000,000 USD per year. Of this amount, Plaintiff roughly estimates that over \$1,000,000 is

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

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

12. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defendants' unauthorized use of its federally registered Copyright Protected Images asserted in this action. This results in 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 January 30, 2026, in Hong Kong.

By: /s/ Liangjie Li  
LIANGJIE LI

**CERTIFICATE OF SERVICE**

I hereby certify that on the 30th day of January 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, Amazon.

By: /s/ Gokalp Bayramoglu  
Gokalp Bayramoglu (NV Bar No. 15500)

<b>Defendant No.</b>	<b>Seller's Name</b>	<b>Seller Contact</b>
<b>1</b>	Dengzhoushiximibaihuodian AG59YYIB2I20H	w15838707084@163.com
<b>2</b>	YUWYUO A1BRL72L0P77HP	xiaonaofuaqa@163.com
<b>3</b>	SUMBERY A1V1P7MVR9O7D5	susanklein987@hotmail.com
<b>4</b>	JHOKCI AMHK6JE7TEH16	yunshixungu6801@126.com
<b>5</b>	Clearance deals 2025 Unstoppable A2O1NPRRA9N6YG	restwork@163.com
<b>6</b>	Xingqiba AQH4JAV7FYQQS	43800386@qq.com
<b>7</b>	QinHuangDaoGuaBiGuShangMao A58Y48RSTWCQS	cereiob80214@163.com