

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA**

Case No.: 1:25-cv-22143-BECERRA

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

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

Defendants,

**PLAINTIFF'S MOTION FOR ENTRY OF CLERK'S DEFAULT
AGAINST CERTAIN DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff"), hereby moves for Entry of Clerk's Default against certain Defendants identified in Schedule "A" to the complaint (collectively, the "Defaulting Defendants") [Dkt 9-3]. The Defaulting Defendants¹ have been separately listed in **Exhibit 1** to the accompanying Declaration of Willam Brees (the "Brees Decl."). Plaintiff makes this motion on the ground that the Defaulting Defendants have failed to appear or otherwise respond to the Complaint within the time prescribed by Federal Rules of Civil Procedure.

On October 9, 2025, the Court authorized electronic service via email on Defendants listed in Schedule "A" in connection with the Temporary Restraining Order ("TRO") [Dkt. Nos. 30, 31].

¹ Plaintiff does not seek entry of Default against Defendant Nos. 1 Xinlees, 6 shengfan, 7 HugeNice, 12 IbuduSexy, 18 TraSuts, 20 CuteCherry, 24 TDiooCor, and 34 DinyIn.

On October 24, 2025, Defendants were served with their respective Summons and copies of the Complaint and Temporary Restraining Order via electronic mail (“e-mail”) to the email addresses provided by the online marketplace Amazon.com response to request for expedited discovery as permitted by the TRO and via website posting pursuant to the Court’s Order authorizing alternate service of process. (Brees Decl. ¶ 3; see Dkt. No. 35 Return of Service on file with the Court.) The deadline to respond to the Complaint and Jury Demand (the “Complaint”) [Dkt. No.1] was November 14, 2025. Brees Decl. ¶ 4.

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 Plaintiff’s Complaint in this action. As of the filing of this Motion, approximately twenty-four (24) days have expired since electronic service was effectuated on the Schedule "A" Defendants, which includes the Defaulting Defendants that are the subject of Plaintiff’s Motion. *Id.* at ¶ 11. To date, none of the Defaulting Defendants have answered or otherwise responded to Plaintiff’s Complaint. *Id.* at ¶ 12.

WHEREFORE, Plaintiff request that default be entered against the Defaulting Defendants, Schedule “A” Nos. 2, 3, 10, 11, 13, 16, 17, 19, 22, 26, 28, 29, 31, 32, 35, 41, and 43

DATED: November 19, 2025

Respectfully submitted,

/s/ William R. Brees

William R. Brees (FL Bar No. 98886)

william@bayramoglu-legal.com

BAYRAMOGLU LAW OFFICES LLC

11540 W. Warm Springs Rd., Ste 100

Henderson, NV 89014

Tel: (702) 462 – 5973

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of November 2025, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, Amazon.

/s/ William R. Brees

William R. Brees (FL Bar No. 98886)
BAYRAMOGLU LAW OFFICES LLC

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SCHEDULE "A,"

Defendants,

**DECLARATION OF WILLIAM R. BREES, ESQ. IN SUPPORT OF PLAINTIFF'S MOTION
FOR ENTRY OF CLERK'S DEFAULT AGAINST CERTAIN DEFENDANTS**

I, William R. Brees, Esq., of St. Petersburg, Florida, declare as follows:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff, Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff") in the above-captioned matter. I make this Declaration, which is filed in support of Plaintiff's Motion for Entry of Clerk's Default Against Certain Defendants, and I could and would testify competently to the matters set forth herein.

2. On May 8, 2025, Plaintiff filed its Complaint and Jury Demand [Dkt. No. 1] against Defendants, the Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations identified on Schedule "A" [Dkt. No. 1-2, 11-2] (collectively, "Defendants").

3. On October 24, 2025, Defendants were served with their respective Summons and copies of the Complaint and Temporary Restraining Order via electronic mail (“e-mail”) and via website posting pursuant to the Court’s Order authorizing alternate service of process. (See Dkt. No. 35 Return of Service on file with the Court.)

4. The deadline to respond to the Complaint and Jury Demand (the “Complaint”) [Dkt. No.1] was November 14, 2025.

5. On November 12, 2025 counsel for Defendant Nos. 1 Xinlees. 6 shengfan, 7 HugeNice, 12 IbuduSexy, 18 TraSuts, 20 CuteCherry, 24 TDiooCor, and 34 DinyIn requested a twenty-one (21) day extension to continue settlement negotiations, to which Plaintiff’s counsel agreed. However, no motion for extension of time was filed or granted.

6. Although the time to respond to the Complaint has expired, Plaintiff’s counsel adheres to the agreement in good faith and anticipates a Motion may be filed by this subset of eight (8) Defendants if no resolution is reached between Parties in short order.

7. As such, this subset of eight (8) Defendants are not included in the list of Defaulting Defendants. Plaintiff respectfully reserves the right to move for entry of default against this subset of eight (8) Defendants should settlement discussions cease and no response to the Complaint is pled.

8. Defendant Nos. 4, 5, 8, 9, 14, 15, 21, 23, 25, 27, 30, 33, 36, 37, 38, 39, 40 and 42 have been Dismissed from this case. [Dkt. Nos. 20, 40, 43, 45 and 55].

9. The remaining Defendants to whom the Motion for Entry of Clerk’s Default applies are Defendant Nos. 2, 3, 10, 11, 13, 16, 17, 19, 22, 26, 28, 29, 31, 32, 35, 41, and 43 (collectively the “Defaulting Defendants”).

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

11. As of the filing of this Motion, approximately twenty-four days (24) have expired since electronic service was effectuated on the Schedule "A" Defendants.

12. The Defaulting Defendants have failed to answer or otherwise respond to the Complaint or serve a copy of the Answer or other response upon Plaintiff's attorneys of record. A list of the Defaulting Defendants is attached hereto as **Exhibit 1**.

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

Executed on November 19, 2025, in St. Petersburg, Florida.

By: /s/ William R. Brees
WILLIAM R. BREES (FL BAR NO. 98886)

EXHIBIT 1

NO.	SELLER'S NAME	LINK TO SELLER'S WEBSITE
2.	Xisenjia	https://www.amazon.com/sp?ie=UTF8&seller=A2ZSL6SQ4I2RAS&asin=B0CYT2XBJL&ref_=dp_merchant_link
3.	Girls' Club	https://www.amazon.com/sp?ie=UTF8&seller=A253CNHTS0PHQM&asin=B0CH9T3NTJ&ref_=dp_merchant_link
10.	PROMLINK Dresses	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A2V6SAA8XTEK5G&asin=B09JRK78TK&ref_=dp_merchant_link
11.	TawangTe	https://www.amazon.com/sp?ie=UTF8&seller=A2K7LJU0EH7ZNR&asin=B0CHVSSQQJW&ref_=dp_merchant_link
13.	Yvette JM	https://www.amazon.com/sp?ie=UTF8&seller=A3CHAHVWBFHE3W&asin=B0C6SHB9FY&ref_=dp_merchant_link&isAmazonFulfilled=1
16.	Febecool	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A32X6FOWLNLMBK&asin=B0C5HCCVSQ&ref_=dp_merchant_link
17.	JIYUEJIYUE	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A1U52NYWO94SQY&asin=B095T2BWP9&ref_=dp_merchant_link
19.	Danswin	https://www.amazon.com/sp?ie=UTF8&seller=A1SV2HCRGTNI7J&asin=B0BFRF47XM&ref_=dp_merchant_link&isAmazonFulfilled=1
22.	RUIZHIRUI	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A13F0UYLYYK89P&asin=B0CYYWYK3H&ref_=dp_merchant_link
26.	shan guang bai huo hang	https://www.amazon.com/sp?ie=UTF8&seller=A16SJLTI9HVKVC&isAmazonFulfilled=0&asin=B0CDTHMRZW&ref_=olp_merchant_name_1
28.	USAQosmon	https://www.amazon.com/sp?ie=UTF8&seller=A35KOEFC7F5PVJ&asin=B0DQNLBDYS&ref_=dp_merchant_link
29.	Shixiangbaihuohang	https://www.amazon.com/sp?ie=UTF8&seller=A39V978427YYJN&asin=B0CW3B9KHW&ref_=dp_merchant_link
31.	dachengrunshius	https://www.amazon.com/sp?ie=UTF8&seller=A3J2T08799YF4P&asin=B0DCZ268XX&ref_=dp_merchant_link
32.	JHZDMKJ	https://www.amazon.com/sp?ie=UTF8&seller=A19238XJ2KXDA4&asin=B0DHR7TFCB&ref_=dp_merchant_link
35.	guchengxianfuyunshangmaoshanghang	https://www.amazon.com/sp?ie=UTF8&seller=AU0UE6DWO7M1Q&asin=B0DRYGWPGC&ref_=dp_merchant_link
41.	Chaos World	https://www.amazon.com/sp?ie=UTF8&seller=A3GYVP5YCU59JR&asin=B095XZVPFV&ref_=dp_merchant_link&isAmazonFulfilled=1
43.	weipinhuifushi	https://www.amazon.com/sp?ie=UTF8&seller=A2PMQD6OX2VXKG&asin=B0DFH1TNPY&ref_=dp_merchant_link

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ASSOCIATIONS IDENTIFIED IN
SCHEDULE "A,"

Defendants,

**[PROPOSED] ORDER GRANTING PLAINTIFF'S MOTION FOR ENTRY
OF CLERK'S DEFAULT AGAINST CERTAIN DEFENDANTS**

Before the Court is Plaintiff Hong Kong Leyuzhen Technology Co. Limited's motion for entry of clerk's default against certain defendants pursuant to Federal Rule of Civil Procedure 55(a) (the "Motion") against certain non-appearing, through the filing of an answer or otherwise responsive pleading, Schedule "A" Defendants (the "Defaulting Defendants"). A true and correct listing of the Defaulting Defendants is included in this Order.

Finding good cause, the Court hereby **GRANTS** Plaintiff's Motion and directs the Clerk to enter default against the Defaulting Defendants.

IT IS SO ORDERED.

DATED: _____

HONORABLE JACQUELINE BECERRA
UNITED STATES DISTRICT COURT JUDGE

DEFAULTING DEFENDANTS

NO.	SELLER'S NAME	LINK TO SELLER'S WEBSITE
2.	Xisenjia	https://www.amazon.com/sp?ie=UTF8&seller=A2ZSL6SQ4I2RAS&asin=B0CYT2XBJL&ref=dp_merchant_link
3.	Girls' Club	https://www.amazon.com/sp?ie=UTF8&seller=A253CNHTS0PHQM&asin=B0CH9T3NTJ&ref=dp_merchant_link
5.	MOJICK	https://www.amazon.com/sp?ie=UTF8&seller=A3LI8RLL84XB8N&asin=B0C7SZD2T1&ref=dp_merchant_link&isAmazonFulfilled=1
9.	rebehaolee	https://www.amazon.com/sp?ie=UTF8&seller=A1CQMR9JR2DUL5&asin=B09X2VQZD9&ref=dp_merchant_link
10.	PROMLINK Dresses	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A2V6SAA8XTEK5G&asin=B09JRK78TK&ref=dp_merchant_link
11.	TawangTe	https://www.amazon.com/sp?ie=UTF8&seller=A2K7LJU0EH7ZNR&asin=B0CHVSQQJW&ref=dp_merchant_link
13.	Yvette JM	https://www.amazon.com/sp?ie=UTF8&seller=A3CHAHVWBFHE3W&asin=B0C6SHB9FY&ref=dp_merchant_link&isAmazonFulfilled=1
14.	DAILSA	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A2576EBPPF0P1F&asin=B0CFX7NT51&ref=dp_merchant_link
15.	EOPUING (Prime Day Deals 2024)	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A3JI9HRLNVZSIU&asin=B0BD7R8QDP&ref=dp_merchant_link
16.	Febecool	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A32X6FOWLNLMBK&asin=B0C5HCCVSQ&ref=dp_merchant_link
17.	JIYUEJIYUE	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A1U52NYWO94SQY&asin=B095T2BWP9&ref=dp_merchant_link
19.	Danswin	https://www.amazon.com/sp?ie=UTF8&seller=A1SV2HCRGTNI7J&asin=B0BFRF47XM&ref=dp_merchant_link&isAmazonFulfilled=1
22.	RUIZHIRUI	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A13F0UYLYYK89P&asin=B0CYYWYK3H&ref=dp_merchant_link
23.	FoveNK	https://www.amazon.com/sp?ie=UTF8&seller=A36JPWSV8DA1D3&asin=B0CG5Q9WLH&ref=dp_merchant_link&isAmazonFulfilled=1
25.	Maymallhill	https://www.amazon.com/sp?ie=UTF8&seller=A2CMKR8PBX8UTO&asin=B0D59XBSSX&ref=dp_merchant_link&isAmazonFulfilled=1
26.	shan guang bai huo hang	https://www.amazon.com/sp?ie=UTF8&seller=A16SJLT19HVKVC&isAmazonFulfilled=0&asin=B0CDTHMRZW&ref=olp_merch_name_1
27.	HGps8w	https://www.amazon.com/sp?ie=UTF8&seller=A1XDYM0Y8GAG92&asin=B0DJVJF8PN&ref=dp_merchant_link
28.	USAQosmon	https://www.amazon.com/sp?ie=UTF8&seller=A35KOEFC7F5PVJ&asin=B0DQNLBDYS&ref=dp_merchant_link

29.	Shixiangbaihuohang	https://www.amazon.com/sp?ie=UTF8&seller=A39V978427YYJN&asin=B0CW3B9KHW&ref=dp_merchant_link
31.	dachengrunshius	https://www.amazon.com/sp?ie=UTF8&seller=A3J2T08799YF4P&asin=B0DCZ268XX&ref=dp_merchant_link
32.	JHZDMKJ	https://www.amazon.com/sp?ie=UTF8&seller=A19238XJ2KXDA4&asin=B0DHR7TFCB&ref=dp_merchant_link
35.	guchengxianfuyunshang maoshanghang	https://www.amazon.com/sp?ie=UTF8&seller=AU0UE6DWO7M1Q&asin=B0DRYGWPGC&ref=dp_merchant_link
36.	DDUNDD	https://www.amazon.com/sp?ie=UTF8&seller=A26M2SW353AWIJ&asin=B0D65J7YF8&ref=dp_merchant_link&isAmazonFulfilled=0
40.	Yundily	https://www.amazon.com/sp?ie=UTF8&seller=A3UMVWHILRXBOG&asin=B0CY5FX6WD&ref=dp_merchant_link
41.	Chaos World	https://www.amazon.com/sp?ie=UTF8&seller=A3GYVP5YCU59JR&asin=B095XZVPFV&ref=dp_merchant_link&isAmazonFulfilled=1
43.	weipinhuifushi	https://www.amazon.com/sp?ie=UTF8&seller=A2PMQD6OX2VXKG&asin=B0DFH1TNPY&ref=dp_merchant_link