

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

OLIVIAMARK.COM,

Defendant.

Case No. 1:25-cv-11289-TMD-DW

Honorable Judge Thomas M. Durkin

Magistrate David Weisman

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT
AGAINST THE DEFENDANT OLIVIAMARK.COM**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff") hereby moves for Entry of Default and Default Judgment against the Defendant, OliviaMark.com. Plaintiff files herewith a Memorandum of Law in support, Declaration of Joshua H. Sheskin and Declaration of Liangjie Li. Plaintiff's Motion for Entry of Default and Default Judgment disposes of the case.

DATED: October 29, 2025

Respectfully submitted,

By: /s/ Joshua H. Sheskin
Joshua H. Sheskin (FL Bar No. 93028)
BAYRAMOGLU LAW OFFICES LLC
233 S. Wacker Drive, 44th Floor, #57
Chicago, IL 60606
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Joshua@bayramoglu-legal.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October 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)

Defendant	Contact
OliviaMark.com	admin@rivierahk.com support@oliviamark.com admin@oliviamark.com

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

Plaintiff,

v.

OLIVIAMARK.COM,

Defendant.

Case No. 1:25-cv-11289-TMD-DW

Honorable Judge Thomas M. Durkin

Magistrate David Weisman

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR ENTRY OF
DEFAULT AND DEFAULT JUDGMENT AGAINST DEFENDANT OLIVIAMARK.COM**

Plaintiff Hong Kong Leyuzhen Technology Co., Ltd. ("Plaintiff") hereby submits this Memorandum of Law in support of its Motion for Entry of Default and Default Judgment (the "Motion") pursuant to Federal Rule of Civil Procedure 55 ("Rule 55") against OliviaMark.com. Plaintiff's Motion is based on this Memorandum of Law, the Declaration of Joshua H. Sheskin, Esq. (the "Sheskin Decl."), the Declaration of Liangjie Li (the "Li Decl."), and the papers and pleadings on file in this case.

I. INTRODUCTION

On September 26, 2025, the Court authorized electronic service via email and publication on Defendant [Dkt. No. 13]. Plaintiff completed service on all named Defendants and filed a Return of Service on October 6, 2025 [Dkt. No. 16]. The deadline to respond to the Complaint was October 27, 2025.

Plaintiff seeks an award of statutory damages under 17 U.S.C. § 504(c) against the Defaulting Defendant for infringing the Copyright Protected Photos, which should be increased due to its willful infringement of the federally registered copyrights below:

The 76 Infringed Copyrights		
VA0002379881	VA0002384828	VA0002414344
VA0002379888	VA0002384829	VA0002414347
VA0002379893	VA0002384838	VA0002414348
VA0002379894	VA0002384843	VA0002414350
VA0002379895	VA0002384873	VA0002414362
VA0002379897	VA0002413488	VA0002414364
VA0002379904	VA0002413504	VA0002414390
VA0002379911	VA0002413679	VA0002414392
VA0002379930	VA0002413692	VA0002414393
VA0002379934	VA0002413737	VA0002414402
VA0002380491	VA0002413747	VA0002414404
VA0002380492	VA0002413807	VA0002414405
VA0002381070	VA0002413976	VA0002414407
VA0002381072	VA0002413985	VA0002414411
VA0002381109	VA0002413992	VA0002414416
VA0002381115	VA0002414192	VA0002414529
VA0002381157	VA0002414214	VA0002414564
VA0002381168	VA0002414215	VA0002414618
VA0002381213	VA0002414223	VA0002414676
VA0002381219	VA0002414225	VA0002414682
VA0002381842	VA0002414228	VA0002414688
VA0002382152	VA0002414248	VA0002414710
VA0002382271	VA0002414260	VA0002414720
VA0002382273	VA0002414330	VA0002414725
VA0002384827	VA0002414337	VA0002414728
		VA0002414744

(the "Copyright Protected Photos"). (Sheskin Decl. ¶ 6.) Plaintiff also requests that the Court issue a permanent injunction against the Defendant. See 17 U.S.C. § 502(a). Alternatively, Plaintiff requests that the Court issue a permanent injunction based on the Defendant's willful violation of the Illinois Uniform Deceptive Trade Practices Act 815 ILCS § 510/1, et. seq.

II. LEGAL STANDARD

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), the Defaulting Defendant 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 Defendant has publicly displayed unlicensed and unauthorized reproductions of Plaintiff's Copyright-Protected Photos on the internet to market and sells competing products using Plaintiff's authentic Rotita Brand Copyrighted Photos, thereby deceiving consumers as to the quality, nature, and source of goods being purchased. (Sheskin Decl. ¶ 6.)

As of the filing of this Motion, approximately twenty-two days (22) have expired since electronic service was effectuated on the Defendant. (Sheskin Decl. ¶ 5.) To date, Defendant has

neither answered nor otherwise responded to Plaintiff's Complaint. (*Id.*) Therefore, the Clerk of the Court is compelled to enter default pursuant to Rule 55(a) against the Defaulting Defendant.

When the Court finds that a defendant is in default, the factual allegations of the complaint are accepted as true and cannot be challenged. The defendant is legally liable for each cause of action stated in the complaint. *Black v. Lane*, 22 F.3d 1395, 1399 (7th Cir. 1994).

In this case, the Defendant has willfully and intentionally infringed upon Plaintiff's copyrighted photos, as alleged in the complaint, supporting the Plaintiff's request for enhanced statutory damages.

Plaintiff also satisfies 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 Defendant because the Defendant directly targets business activities toward consumers in Illinois and causes 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 Defendant.

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). The Plaintiff clearly meets these requirements as follows. The Plaintiff filed its Complaint alleging, among other claims, Copyright Infringement (Count I) and violation of the Uniform Deceptive Trade Practices Act (Count II), as detailed in the Complaint. [Dkt. No. 1].

The Defendant was properly served with the Complaint, Summons, and supporting documents via electronic service on October 6, 2025. [Dkt. No. 16]. The Defaulting Defendant had twenty-one (21) days to answer or otherwise respond to Plaintiff's Complaint under Rule 12(a)(1)(A). Therefore, they were required to respond by October 27, 2025. [*Id.*] As of the filing of this Motion, approximately twenty-two (22) days have passed since electronic service was made on the Defendant. (Sheskin Decl. ¶ 4.) To date, the Defendant has not answered, appeared, or otherwise responded to the Complaint. (*Id.*)

Accordingly, the Clerk of the Court is required to enter default and default judgment under Rule 55 against the Defaulting Defendant.

C. 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 Defendant is 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 Defendant was served, and

the Defendant has 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 Defendant: (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 Defendant's infringement of the Plaintiff's Copyright-Protected Photos, which was done willfully and intentionally. (Sheskin 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 at bar, Plaintiff has asserted a viable claim for infringement of its Copyright-Protected Photos. 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 Photos 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 Defendant has infringed upon the Plaintiff's Copyright-Protected Photos. By default, the Defendant has admitted that it has infringed the Plaintiff's Copyright-Protected Photos.

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 Defendant's 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 Defendant is 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 Photos. *See* 17 U.S.C. § 504(b). As such, there is no verifiable information concerning the Defaulting Defendant's gross infringing sales of its competing products using Plaintiff's Copyright or the associated deductible expenses from the same. (Sheskin Decl. ¶ 8.)

Furthermore, while the Plaintiff can approximate the Defendant's net profits from its 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 Photos, 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 Defendant's conduct, the Plaintiff is entitled to statutory damages and an enhancement of statutory damages. In this case, the Defendant was provided with notice of these proceedings and elected not to appear and defend. (Sheskin Decl. ¶8). As a result of the Defendant's intentional decision not to appear and defend this action, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual damages. (*Id.*)

The plaintiff has expended considerable capital to secure the registration of the Copyright-Protected Photos and to advertise its brand in the United States and the State of Illinois. (Li. Decl.

¶ 10 & 11.) This includes spending over \$80,000 to secure the company's copyright registrations with the United States Copyright Office and spending approximately \$8,000,000 to \$12,000,000 annually to advertise and promote its Rotita brand in the United States. (Li Decl. ¶ 10.) The significant investment in protecting the Rotitia Brand justifies Plaintiff's request for statutory damages.

The Defendant's infringement clearly supports awarding the requested statutory damage award against it. It is without question that the Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright-Protected Photos, which have then appeared on the Defendant's online store. (Li Decl. ¶ 8.) Moreover, the Defendant has unquestionably been operating its online store using the misappropriated Copyright-Protected Photos. These actions by the Defendant 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 copyright infringed (76 total) to be trebled at the Court's discretion. (Sheskin Decl. ¶ 11)

2. Plaintiff is entitled to enhanced statutory damages.

Here, the Defendant's 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). Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright-Protected Photos. (Sheskin Decl. ¶¶ 10-11.)

Additionally, the Defendant did not violate one or two copyrights; the Defendant violated 76 copyrights with at least 314 infringing product code links displaying Plaintiff's Photos, making

it inconceivable that the Defendant was unaware of its infringement, Defendant acted intentionally, and acted with reckless disregard for the Plaintiff's intellectual property rights.

Plaintiff's cases are monitored on www.SellerDefense.cn. This website advises its followers and 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 usually decided to simply cut their losses where Plaintiff has a high likelihood of success, abandon any online storefront, and bask in the security that any judgment issued against them will almost certainly not be collectible in China. (Sheskin 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 Defendant, as they should deter future conduct. *Id.* at 1229-30. Here, the Defendant is likely watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Sheskin 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 Defendant. (*Id.* ¶ 9.)

The Defendant has simply taken the apparent position that any recovery issued by a court is not executable against its assets because it is not likely located 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 Defendant, and all other similar infringers, that they will incur substantial liability for their actions. In doing so, hopefully the Defendant, or other similar infringers monitoring this case, will post this anticipated award on the

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©(2).

3. Plaintiff is entitled to a permanent injunction.

Next, Plaintiff is entitled to the entry of a permanent injunction against the Defendant. This request is justified under either 17 U.S.C. § 502(a) or under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3.

This provision allows courts to issue such relief on terms deemed reasonable to protect the rights of copyright holders. When 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. In *Virgin Records Am. Inc. v. Johnson*, 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. *Virgin Records Am. Inc. v. Johnson*, 441 F. Supp. 2d 963. Here, the Defaulting Defendant has elected not to appear or respond to the lawsuit and therefore shows a likelihood they will continue infringement absent a permanent injunction.

Courts in the 7th Circuit have also applied the four-factor test for injunctive relief, requiring plaintiffs to show irreparable harm, inadequacy of legal remedies, a balance of hardships favoring the plaintiff, and that the injunction serves the public interest. 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, Plaintiff has a valid copyright claim against the Defendant, which has a presumption of irreparable harm. Additionally, permanently enjoining the copyright infringement will ensure that the public interest is served by preventing any future infringement of the Copyrighted Photos.

As such, Plaintiff's right to permanent injunctive relief under 17 U.S.C. § 502(a) or under the Uniform Deceptive Practices Act pursuant to 815 ILCS § 510/3, is uncontested and supported by the substantial evidentiary record previously provided to the Court. Accordingly, Plaintiff is entitled to the issuance of permanent injunctive relief against the Defendant.

V. CONCLUSION

Under Rule 55(b)(2), Plaintiff respectfully requests this Court for entry of a default judgment finding the Defendant liable on all counts asserted in Plaintiff's Complaint. [Dkt. No. 1.] These asserted counts include claims for Copyright Infringement (Count I), and violation of the Illinois Uniform Deceptive Trade Practices Act (the "Uniform Deceptive Trade Practices Act") (Count II). [Dkt. No. 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 Defendant pursuant to 17 U.S.C. § 502(a) or under the Uniform Deceptive Trade Practices Act pursuant to 815 ILCS § 510/3; and (4) such other relief as the Court deems just and proper.

DATED: October 29, 2025

Respectfully submitted,

By: /s/ Joshua H. Sheskin
Joshua H. Sheskin (FL Bar No. 93028)
BAYRAMOGLU LAW OFFICES LLC
233 S. Wacker Drive, 44th Floor, #57
Chicago, IL 60606
Tel: (702) 462-5973 Fax: (702) 553-3404
Joshua@bayramoglu-legal.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October 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)

Defendant	Contact
OliviaMark.com	admin@rivierahk.com support@oliviamark.com admin@oliviamark.com

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

OLIVIAMARK.COM,

Defendant.

Case No. 1:25-cv-11289-TMD-DW

Honorable Judge Thomas M. Durkin

Magistrate David Weisman

**DECLARATION OF JOSHUA H. SHESKIN IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Joshua H. Sheskin, of the City of Mt. Lebanon, in the State of Pennsylvania, 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 for Default and Default Judgment (the "Motion") against the Defendant OliviaMark.com.

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

4. I hereby certify that the Defendant has 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, Defendant was served with copies of the Summons and Complaint via electronic service, as authorized by the Court, on October 6, 2025, which is reflected in the Return of Summons filed in this case. [Dkt. No. 16] As of the filing of this Motion, approximately twenty-two (22) days have passed since electronic service was completed on the Defendant. Defendant has not answered, appeared, or otherwise responded to Plaintiff's Complaint in this case.

6. Plaintiff's asserted claims for relief in this action involve the intentional, willful infringement of the following federally registered copyright-protected photos:

The 76 Infringed Copyrights		
VA0002379881	VA0002384828	VA0002414344
VA0002379888	VA0002384829	VA0002414347
VA0002379893	VA0002384838	VA0002414348
VA0002379894	VA0002384843	VA0002414350
VA0002379895	VA0002384873	VA0002414362
VA0002379897	VA0002413488	VA0002414364
VA0002379904	VA0002413504	VA0002414390
VA0002379911	VA0002413679	VA0002414392
VA0002379930	VA0002413692	VA0002414393
VA0002379934	VA0002413737	VA0002414402
VA0002380491	VA0002413747	VA0002414404
VA0002380492	VA0002413807	VA0002414405
VA0002381070	VA0002413976	VA0002414407
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VA0002381842	VA0002414228	VA0002414688
VA0002382152	VA0002414248	VA0002414710
VA0002382271	VA0002414260	VA0002414720
VA0002382273	VA0002414330	VA0002414725
VA0002384827	VA0002414337	VA0002414728
		VA0002414744

(the "Copyright Protected Photos").

7. As alleged in the Complaint, the Defendant has displayed, without authorization, the Copyright Protected Photos on its online independent website sales platform www.oliviamark.com (the “Platform”) to market and sell competing products resembling Plaintiff’s authentic Rotita products through the unauthorized use of Plaintiff’s copyright photos on its online store (the “Online Store”). Thereby, deceiving consumers about the quality, nature, and source of the goods being purchased that Defendant’s products would be comparable to the reproduced photos displayed on its webpage instead of poor-quality imitations consumers receive.

8. The Defendant was notified of these proceedings and, apparently, chose not to appear and defend itself. Due to the Defendant’s 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 Defendant.

9. To maximize the deterrent effect of the Court’s expected default and default judgment, Plaintiff requests that enhanced statutory damages be imposed on the Defaulting Defendant, and that they be trebled.

10. The fundamental nature of the copyright infringement scheme shows that the Defendant was 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 Defendant could quickly obtain, without permission, Plaintiff’s copyright-protected photos and sell matching clothing through its online store.

11. The facts presented not only demonstrate the Defaulting Defendant’s knowledge and deliberate infringement of Plaintiff’s Copyright-Protected Photos. Therefore, Plaintiff should be awarded statutory damages, based on Defendant’s intentional infringement of the Copyright-

Protected Photos. Plaintiff seeks \$5,000 in damages for each of the 76 copyrights, trebled at the court's discretion. Attached as **Exhibit 1** to this Declaration is Defendant contact information and Plaintiff's request for damages.

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

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

DATED: October 29, 2025

By: /s/ Joshua H. Sheskin
Joshua H. Sheskin (Bar No. 93028)
BAYRAMOGLU LAW OFFICES, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October 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)

Defendant	Contact
OliviaMark.com	admin@rivierahk.com support@oliviamark.com admin@oliviamark.com

Exhibit 1

Defendant: OliviaMark.com

Contact: admin@rivierahk.com; support@oliviamark.com; admin@oliviamark.com

Copyrights Infringed and Request for Damages:

Copyright	Statutory Damage Request	Enhanced 3x for Willful Infringement
VA0002379881	\$5,000.00	\$15,000.00
VA0002379888	\$5,000.00	\$15,000.00
VA0002379893	\$5,000.00	\$15,000.00
VA0002379894	\$5,000.00	\$15,000.00
VA0002379895	\$5,000.00	\$15,000.00
VA0002379897	\$5,000.00	\$15,000.00
VA0002379904	\$5,000.00	\$15,000.00
VA0002379911	\$5,000.00	\$15,000.00
VA0002379930	\$5,000.00	\$15,000.00
VA0002379934	\$5,000.00	\$15,000.00
VA0002380491	\$5,000.00	\$15,000.00
VA0002380492	\$5,000.00	\$15,000.00
VA0002381070	\$5,000.00	\$15,000.00
VA0002381072	\$5,000.00	\$15,000.00
VA0002381109	\$5,000.00	\$15,000.00
VA0002381115	\$5,000.00	\$15,000.00
VA0002381157	\$5,000.00	\$15,000.00
VA0002381168	\$5,000.00	\$15,000.00
VA0002381213	\$5,000.00	\$15,000.00
VA0002381219	\$5,000.00	\$15,000.00
VA0002381842	\$5,000.00	\$15,000.00
VA0002382152	\$5,000.00	\$15,000.00
VA0002382271	\$5,000.00	\$15,000.00
VA0002382273	\$5,000.00	\$15,000.00
VA0002384827	\$5,000.00	\$15,000.00
VA0002384828	\$5,000.00	\$15,000.00
VA0002384829	\$5,000.00	\$15,000.00

Copyright	Statutory Damage Request	Enhanced 3x for Willful Infringement
VA0002384838	\$5,000.00	\$15,000.00
VA0002384843	\$5,000.00	\$15,000.00
VA0002384873	\$5,000.00	\$15,000.00
VA0002413488	\$5,000.00	\$15,000.00
VA0002413504	\$5,000.00	\$15,000.00
VA0002413679	\$5,000.00	\$15,000.00
VA0002413692	\$5,000.00	\$15,000.00
VA0002413737	\$5,000.00	\$15,000.00
VA0002413747	\$5,000.00	\$15,000.00
VA0002413807	\$5,000.00	\$15,000.00
VA0002413976	\$5,000.00	\$15,000.00
VA0002413985	\$5,000.00	\$15,000.00
VA0002413992	\$5,000.00	\$15,000.00
VA0002414192	\$5,000.00	\$15,000.00
VA0002414214	\$5,000.00	\$15,000.00
VA0002414215	\$5,000.00	\$15,000.00
VA0002414223	\$5,000.00	\$15,000.00
VA0002414225	\$5,000.00	\$15,000.00
VA0002414228	\$5,000.00	\$15,000.00
VA0002414248	\$5,000.00	\$15,000.00
VA0002414260	\$5,000.00	\$15,000.00
VA0002414330	\$5,000.00	\$15,000.00
VA0002414337	\$5,000.00	\$15,000.00
VA0002414344	\$5,000.00	\$15,000.00
VA0002414347	\$5,000.00	\$15,000.00
VA0002414348	\$5,000.00	\$15,000.00
VA0002414350	\$5,000.00	\$15,000.00
VA0002414362	\$5,000.00	\$15,000.00
VA0002414364	\$5,000.00	\$15,000.00
VA0002414390	\$5,000.00	\$15,000.00
VA0002414392	\$5,000.00	\$15,000.00

Copyright	Statutory Damage Request	Enhanced 3x for Willful Infringement
VA0002414393	\$5,000.00	\$15,000.00
VA0002414402	\$5,000.00	\$15,000.00
VA0002414404	\$5,000.00	\$15,000.00
VA0002414405	\$5,000.00	\$15,000.00
VA0002414407	\$5,000.00	\$15,000.00
VA0002414411	\$5,000.00	\$15,000.00
VA0002414416	\$5,000.00	\$15,000.00
VA0002414529	\$5,000.00	\$15,000.00
VA0002414564	\$5,000.00	\$15,000.00
VA0002414618	\$5,000.00	\$15,000.00
VA0002414676	\$5,000.00	\$15,000.00
VA0002414682	\$5,000.00	\$15,000.00
VA0002414688	\$5,000.00	\$15,000.00
VA0002414710	\$5,000.00	\$15,000.00
VA0002414720	\$5,000.00	\$15,000.00
VA0002414725	\$5,000.00	\$15,000.00
VA0002414728	\$5,000.00	\$15,000.00
VA0002414744	\$5,000.00	\$15,000.00
	Total Requested:	\$1,140,000.00

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

OLIVIAMARK.COM,

Defendant.

Case No. 1:25-cv-11289-TMD-DW

Honorable Judge Thomas M. Durkin

Magistrate David Weisman

**DECLARATION OF LIANGJIE LI IN SUPPORT OF PLAINTIFF'S
MOTION FOR DEFAULT AND DEFAULT JUDGMENT**

I, Liangjie Li, of Hong Kong, a special administrative region of the People's Republic of China, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Motion for Default and Default Judgment (the "Motion").

3. I am the Chief Operations Officer for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my 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 infringement of its intellectual property through online platforms

including independent website sales platforms (the “Platform”). Plaintiff does not sell its products through any 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 Defendant in this action. The Defaulting Defendant is accused of intentionally and willfully infringing Plaintiff’s copyrights, bearing the registrations:

The 76 Infringed Copyrights		
VA0002379881	VA0002384828	VA0002414344
VA0002379888	VA0002384829	VA0002414347
VA0002379893	VA0002384838	VA0002414348
VA0002379894	VA0002384843	VA0002414350
VA0002379895	VA0002384873	VA0002414362
VA0002379897	VA0002413488	VA0002414364
VA0002379904	VA0002413504	VA0002414390
VA0002379911	VA0002413679	VA0002414392
VA0002379930	VA0002413692	VA0002414393
VA0002379934	VA0002413737	VA0002414402
VA0002380491	VA0002413747	VA0002414404
VA0002380492	VA0002413807	VA0002414405
VA0002381070	VA0002413976	VA0002414407
VA0002381072	VA0002413985	VA0002414411
VA0002381109	VA0002413992	VA0002414416
VA0002381115	VA0002414192	VA0002414529
VA0002381157	VA0002414214	VA0002414564
VA0002381168	VA0002414215	VA0002414618
VA0002381213	VA0002414223	VA0002414676
VA0002381219	VA0002414225	VA0002414682
VA0002381842	VA0002414228	VA0002414688
VA0002382152	VA0002414248	VA0002414710
VA0002382271	VA0002414260	VA0002414720
VA0002382273	VA0002414330	VA0002414725
VA0002384827	VA0002414337	VA0002414728
		VA0002414744

(the “Copyright Protected Photos”).

7. It is without question that the Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright-Protected Photos. In this regard, Plaintiff's Copyright-Protected Photos, often depicting recent product releases, have appeared on the Defendant's Online Store.

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

9. The Defendant has intentionally used the Copyright-Protected Photos for soliciting its competing Rotita product sales.

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. Plaintiff expects to earn approximately 30% net profit on the sale of its Rotita brand products. This figure, however, includes substantial advertising expenses that the Defaulting Defendant would not have to pay, as it is 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 Defendant's total sales through the Online Store or to ascertain their expenses related to its 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 Defendant's unauthorized use of its federally registered copyright-protected photos 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 October 29, 2025, in Hong Kong.

By: /s/ Liangjie Li
LIANGJIE LI

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of October 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)

Defendant	Contact
OliviaMark.com	admin@rivierahk.com support@oliviamark.com admin@oliviamark.com