

**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 IN SCHEDULE "A,"

Defendants.

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

**Honorable Steven C. Seeger**

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

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 Defendants 1-7. 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 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: VA0002384829, VA0002379930, VA0002381840, VA0002369378, VA0002381842, VA0002379907, VA0002381125, VA0002381142, VA0002379894 (the “Copyright Protected Images”). (Sheskin Decl. ¶ 6.) Plaintiff also requests that the Court issue a permanent injunction against the Defendants. See 17 U.S.C. § 502(a). Alternatively, Plaintiff requests that the Court issue a permanent injunction based on the Defendants’ 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 Defendants have 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 Image on the internet to market and sell competing products using Plaintiff's authentic Rotita Brand Copyrighted Image, 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-five days have expired since electronic service was effectuated on the Defendants. (Sheskin Decl. ¶ 5.) To date, Defendants have not answered or 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 Defendants.

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 Defaulting Defendants have willfully and intentionally infringed upon Plaintiff's copyrighted images, 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 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 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 Defaulting Defendants were properly served with the Complaint, Summons, and supporting documents via electronic service on October 17, 2025. [Dkt. No. 24]. The Defaulting Defendants 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 November 7, 2025. [*Id.*] As of the filing of this Motion, approximately twenty-five 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 Defendants.

### **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 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 (25) days have passed since the Defendant was 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. (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, 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 Image 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 Image. 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 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 Image. *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. (Sheskin 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 Image, 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. In this case, the Defaulting

Defendants were provided with notice of these proceedings and elected not to appear and defend. (Sheskin 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 Image. 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 at the Court's discretion. (Sheskin Decl. ¶ 11)

***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 copyrighted images. (Sheskin 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. (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 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. (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 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. 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 Defendants have elected not to appear or respond to the lawsuit, thereby indicating a likelihood that they will continue to infringe 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 Defaulting Defendants, 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 Images.

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 Defaulting Defendants.

### 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), 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: November 12, 2025

Respectfully submitted,

By: /s/ Joshua H. Sheskin,  
Joshua H. Sheskin (FL Bar 93028)  
**BAYRAMOGLU LAW OFFICES LLC**  
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*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th 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, Walmart.

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

**IN THE UNITED STATES DISTRICT COURT  
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**Honorable Steven C. Seeger**

**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 Defendants Identified in Schedule "A".

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 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. As of the filing of this Motion, approximately twenty-five days have passed since electronic service was completed on the Defendants. Defaulting Defendants have 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 images: VA0002384829, VA0002379930, VA0002381840, VA0002369378, VA0002381842, VA0002379907, VA0002381125, VA0002381142, VA0002379894 (the "Copyright Protected Images").

7. As alleged in the Complaint, the Defaulting Defendants have displayed, without authorization, the Copyright Protected Images on Walmart.com (the "Platform") to market and sell competing products resembling Plaintiff's authentic Rotita brand items through its online store (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 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 Defaulting 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 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 image 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 in damages for each of the 78 copyrights, trebled at the court's discretion.

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.

DATED: November 12, 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 12th 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.

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