

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

Wumei Lin,

Plaintiff,

v.

HONG KONG JIBI LIMITED,

Defendant.

Case No. 1:25-cv-12390-EEC-LKM

Honorable Edmond E. Chang

Magistrate Laura K. McNally

PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT

Plaintiff Wumei Lin (“Plaintiff”) hereby moves for Entry of Default and Default Judgment against the Defendant, HONG KONG JIBI LIMITED and separately listed in Exhibit 1 to the accompanying Declaration of Katherine M. Kuhn (the "Kuhn Decl."). Plaintiff files a Memorandum of Law in support, Declaration of Katherine M. Kuhn, Declaration of Wumei Lin, and accompanying Exhibit. Plaintiff’s Motion for Entry of Default and Default Judgment disposes of the case.

DATED: December 26, 2025

Respectfully Submitted,

By: /s/ Katherine Kuhn
Katherine M. Kuhn (Bar No. 6331405)
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC
233 S. Wacker Drive, 44th Floor, #57
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Katherine@bayramoglu-legal.com
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of December 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>, and distributed to e-commerce platform, Temu.

By: /s/ Katherine M. Kuhn
Katherine M. Kuhn (Bar No. 6331405)

Store Name	Mall ID	Email
HONG KONG JIBI LIMITED	634418219980101	jzhongshengzhi2024@163.com

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

Wumei Lin,

Plaintiff,

v.

HONG KONG JIBI LIMITED,

Defendant.

Case No. 1:25-cv-12390-EEC-LKM

Honorable Edmond E. Chang

Magistrate Laura K. McNally

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

Plaintiff Wumei Lin ("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 the Defendant, HONG KONG JIBI LIMITED ("Defaulting Defendant"), which has been separately listed in Exhibit 1 to the accompanying Declaration of Katherine M. Kuhn (the "Kuhn Decl."). Plaintiff's Motion is made and based upon this Memorandum of Law, the Declaration of Katherine M. Kuhn, the Declaration of Wumei Lin (the "Lin Decl."), the papers and pleadings on file in this action, and any argument of counsel the Court may entertain. Plaintiff's Motion for Entry of Default and Default Judgment disposes of the case.

I. INTRODUCTION

On November 21, 2025, the Court authorized electronic service via email on Defendant [Dkt. No. 23]. Plaintiff completed service on Defendant on December 2, 2025, and filed a Return of Service [Dkt. No. 31]. The deadline to respond to the First Amended Complaint was December 23, 2025.

Plaintiff seeks an award of \$5,000 statutory damages pursuant to 17 U.S.C. § 504(c) against the individual Defaulting Defendant, which Plaintiff requests to be enhanced to \$12,500 for their willful infringement to of the federally registered copyright asserted in this action, VA0002412626 (the "Copyrighted Photo"). (Kuhn Decl. ¶ 5.) Plaintiff additionally requests the Court to issue a permanent injunction against the Defaulting Defendant. *See* 17 U.S.C. § 502(a).

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 Plaintiff's First Amended Complaint in this action. 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).

III. FACTUAL BACKGROUND

As alleged in the First Amended Complaint, here the Defaulting Defendant has publicly displayed unlicensed and unauthorized reproductions of Plaintiff's Copyrighted Photo on the Temu online sales platform (the "Platform") to market and sell competing products using Plaintiff's Copyrighted Photo. Thereby deceiving public consumers as to the quality, nature, and source of goods being purchased. (Kuhn Decl. ¶ 6.) Moreover, the Defaulting Defendant is alleged to be operating as part of a coordinated, sophisticated network that utilizes a common supply chain and manufacturing source to fulfill consumer orders. As of the filing of this Motion, more than twenty-one days (21) have expired since electronic service was effectuated on the Defendant, (Kuhn Decl. ¶ 4.) To date, the Defaulting Defendant has not answered or otherwise responded to Plaintiff's First

Amended 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 determines that a defendant is in default, the factual allegations of the complaint are taken as true and may not be challenged, and 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). Here, Defaulting Defendant has willfully and intentionally infringed Plaintiff's Copyrighted Photo, supporting the Plaintiff's request for enhanced statutory damages. Plaintiff meets 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. 11 at 7-12.] Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendant since the Defendant directly targets business activities toward consumers in Illinois and causes harm to Plaintiff's business within this judicial district. [Dkt. No. 17]; *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. In the case at bar, it is unquestionable that the Defaulting Defendant is subject to personal jurisdiction in this action.

B. Plaintiff Has Met the Requirements for Entry of Default Under Rule 55(a)

Pursuant to Rule 55(a), "when a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk must enter the party's default." Fed. R. Civ. P. 55(a). Plaintiff clearly meets these requirements. Here, Plaintiff filed its First Amended Complaint alleging, among other claims, Copyright Infringement (Count I) as asserted in the company's First Amended Complaint. [Dkt. No. 17]. Defendant was properly served with the First Amended Complaint, Summons, and all supporting documents via electronic service on December 2, 2025. [Dkt. No. 31] The Defaulting Defendant had twenty-one (21) days to answer or otherwise respond to Plaintiff's First Amended Complaint pursuant to Rule 12(a)(1)(A). Here, the Defaulting Defendant was required to answer or otherwise respond to the First Amended Complaint on or before December 23, 2025. [*Id.*] As of the filing of this Motion, more than twenty-one (21) days have expired since electronic service was effectuated on the Defendant. (Kuhn Decl. ¶ 4.) To date, Defaulting Defendant has not answered or otherwise responded to Plaintiff's First Amended Complaint. (*Id.*) Accordingly, the Clerk of the Court is compelled to enter default and a default judgment should be entered pursuant to 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 Defendant are liable on each cause of action alleged against them in the complaint. *Di Mucci*, 879 F.2d at 1497. When a court determines that a defendant is in default, the factual allegations of the complaint are taken as true and may not be challenged, and the Defendant are liable as a matter of law as to each cause of action alleged in the complaint upon entry of default judgment. *Black*, 22 F.3d at 1399. Here, more than twenty-one (21) days have passed since Defendant were served, and

no answer or other responsive pleading has been filed by the Defaulting Defendant. *See* Fed. R. Civ. P. 12(a)(1)(A). Therefore, an entry of a default judgment is appropriate.

Moreover, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the Defaulting Defendant: (1) an award of \$5,000 in statutory damages and profits against the Defaulting Defendant for copyright infringement under 17 U.S.C. § 504(c)(1); (2) an award of enhanced \$12,500 in statutory damages per Defaulting Defendant for willful infringement pursuant to 17 U.S.C. § 504(c)(2); and (3) entry of a permanent injunction pursuant to 17 U.S.C. § 502(a).

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 Plaintiff's Copyrighted Photo, which it maintains was done willfully and intentionally. (Kuhn Decl. ¶ 12.). A copyright owner is entitled to recover the actual damages suffered for infringement, and any profits of the infringer that are 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 Copyrighted Photo. 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). Here, Plaintiff has alleged its ownership of the asserted Copyrighted Photo in its First Amended Complaint [Dkt. No. 17] and has supplied the Court with a summary of all registrations issued by the United States Copyright Office [Dkt. No. 17-1, Ex. 1]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulting Defendant has infringed Plaintiff's Copyrighted Photo. [Dkt. No. 17-2, 17-3.] Therefore, the Defaulting Defendant has infringed Plaintiff's Copyrighted Photo.

Next, Plaintiff is entitled to an award of statutory damages given the circumstances in this action. 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 rigid formula. *Id.* (citing *Chi-Boy Music v. Charlie Club, Inc.*, 930 F.2d 1224, 1229 (7th Cir. 1991)). Instead, the court enjoys wide discretion in setting a statutory damage award within the prescribed range from \$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 such factors as the difficulty or impossibility of proving actual damages, the circumstances of the infringement, and the efficacy of the damages as a deterrent to future copyright infringement. *Chi-Boy Music*, 930 F.2d at 1229. Here, Plaintiff has established unquestionably viable copyright infringement claims in this case. Additionally, the Defaulting Defendant's willful refusal to appear and defend against the asserted claims has deprived Plaintiff of the ability to present evidence concerning verifiable infringing sales or costs associated with such sales. Specifically, Plaintiff has neither obtained, nor is the Defaulting Defendant participating in these proceedings, so that the Court can be provided with the infringer's deductible expenses related to the sale of the

products associated with the unauthorized use and public display of Plaintiff's Copyrighted Photo. *See* 17 U.S.C. § 504(b). As such, there is no verifiable information concerning the Defaulting Defendant's gross infringing sales of its products using Plaintiff's copyrights or the associated deductible expenses from same. (Kuhn Decl. ¶ 7.) Moreover, Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendant's unlicensed and unauthorized use of its federally registered copyright protected photographs asserted in this action. (Lin Decl. ¶ 11) This results in the direct harm to Plaintiff's brand reputation and loss of exclusive licenses, both of which are harms that are virtually impossible to ascertain the resulting economic loss. (*Id.*) Therefore, an award of statutory damages is appropriate because actual damages are virtually impossible to prove in this case. *See White*, 771 F.Supp.2d at 956. Given the foregoing circumstances, and the nature of the Defaulting Defendant' conduct, Plaintiff asserts that it is entitled to an award of \$5,000 in statutory damages against Defaulting Defendant and submits an analysis showing Defaulting Defendant, the copyright infringed, and the enhanced statutory damages requested. (Kuhn Decl. ¶ 12, Exhibit. 1.)

In this case the Defaulting Defendant was provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend. (Kuhn Decl. ¶ 7). As a result of the Defaulting Defendant' 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 Defaulting Defendant has intentionally used the Copyrighted Photo for soliciting its product sales without obtaining a license and has never been authorized to use the Copyrighted Photo. (Lin Decl. ¶ 8) It is impossible to definitively calculate the Defaulting Defendant's total sales on the Platform through their Online Stores or to ascertain its expenses related to its infringing sales because they have failed to appear, defend, or otherwise participate in this action. (*Id.* ¶ 9) These facts

unquestionably support Plaintiff's request statutory damages per infringed Copyrighted Photo of the Defaulted Defendant.

The actions of the Defaulting Defendant's infringement clearly support awarding the requested statutory damage award against them. It is without question that the Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyrighted Photo. In this regard, Plaintiff's Copyright Protected Photographs, without a license, have appeared on the Defaulting Defendant's online stores maintained with the Temu Platform. (Lin Decl. ¶ 6.) 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 an amount not less than \$5,000.00 per infringed Copyrighted Photo. (Kuhn Decl. ¶ 12, Ex. 1)

2. Plaintiff is entitled to enhanced statutory damages.

Here, the Defaulting Defendant' infringement clearly supports awarding an enhanced statutory damage award against them. The Defaulting Defendant's infringing conduct in this action is willful, thereby justifying enhanced damages under 17 U.S.C. § 504(c)(2). Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyrighted Photo. (Kuhn Decl. ¶ 5, 12.) The Defaulting Defendant has clearly been operating its online stores using the unauthorized and unlicensed Copyrighted Photo. Upon information and belief, the Defaulting Defendant has been acting through its network to actively monitor and post information on the Plaintiff's pending cases on the website www.SellerDefense.cn. (Kuhn Decl. ¶ 8.) This has apparently been done to advise Defendant in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. (*Id.*) These circumstances reveal an overall common scheme the Defaulting Defendant, 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 collectable in the Republic of China. (Kuhn Decl. ¶ 8.) 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 the enhanced statutory damages against the Defaulting Defendant on the grounds that they should serve as a deterrent to future conduct. *Id.* at 1229-30. Here, the Defaulting Defendant are watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Kuhn Decl. ¶ 8.) 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 Defendant for its alleged infringement of the Copyrighted Photo. (*Id.* ¶ 9.) The Defaulting Defendant has simply taken the apparent position that any recovery issued by a court is not executable against their assets on the named online platform 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 Defendant, and all other similar infringers, that they will incur substantial liability for their actions. In doing so, hopefully the Defaulting 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.

Here, Plaintiff respectfully requests the Court enter an award of \$5,000 statutory damages per infringed Copyrighted Photo, which should be enhanced to \$12,500 for willful infringement per infringed Copyright Protected Work, pursuant to 17 U.S.C. § 504(c)(2). A request analysis is provided as Exhibit 1 to the Kuhn Declaration. (Kuhn Decl. ¶ 12, Exhibit. 1).

3. Plaintiff is entitled to a permanent injunction.

Next, Plaintiff is entitled to entry of a permanent injunction against the Defaulting Defendant. This request is justified under 17 U.S.C. § 502(a).

This provision allows courts to issue such relief on terms deemed reasonable to protect the rights of copyright holders. In cases where Defendant fails 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. For example, 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, Defaulting Defendant has elected to not 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 Defaulting Defendant, which has a presumption of irreparable harm in this case. Additionally, permanently enjoining the copyright infringement will ensure that public interest is met, by preventing any future, continued infringement of the Copyrighted Photo.

As such, Plaintiff's right to permanent injunctive relief under 17 U.S.C. § 502(a), is uncontested and supported by the substantial evidentiary record previously provided to the Court. Accordingly, Plaintiff is entitled to issuance of permanent injunctive relief against the Defaulting Defendant.

V. CONCLUSION

Under Rule 55(b)(2), Plaintiff respectfully requests this Court for entry of a default judgment finding the Defaulting Defendant liable on all counts asserted in Plaintiff's First Amended Complaint. [Dkt. No. 17.] These asserted counts include claims for Copyright Infringement (Count I). In granting its request, Plaintiff asks the Court to award the following: (1) \$5,000 in statutory damages against Defaulting Defendant per infringed Copyright pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced statutory damages of \$12,500 against Defaulting Defendant per infringed Copyrighted Photo based on its willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) issuance of a permanent injunction against the Defaulting Defendant pursuant to 17 U.S.C. § 502(a); and (4) such other relief as the Court deems just and proper.

DATED: December 26, 2025

Respectfully Submitted,

By: /s/ Katherine Kuhn
Katherine M. Kuhn (Bar No. 6331405)
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC
233 S. Wacker Drive, 44th Floor, #57
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Tel: (702) 462-5973 Fax: (702) 553-3404
Katherine@bayramoglu-legal.com
joseph@bayramoglu-legal.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of December 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>, and distributed to e-commerce platform, Temu.

By: /s/ Katherine M. Kuhn
Katherine M. Kuhn (Bar No. 6331405)

Store Name	Mall ID	Email
HONG KONG JIBI LIMITED	634418219980101	jzhongshengzhi2024@163.com

**IN THE UNITED STATES DISTRICT COURT
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Wumei Lin,

Plaintiff,

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HONG KONG JIBI LIMITED,

Defendant.

Case No. 1:25-cv-12390-EEC-LKM

Honorable Edmond E. Chang

Magistrate Laura K. McNally

**DECLARATION OF KATHERINE M. KUHN IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Katherine M. Kuhn, of the City of Chicago, in the State of Illinois, 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 Entry of Default and Default Judgment (the "Motion") against the Defendant, HONG KONG JIBI LIMITED ("Defaulting Defendant"), which has been separately listed in Exhibit 1 to this Declaration.

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

4. I hereby certify that the Defaulting Defendant (as defined in the accompanying Memorandum) has failed to plead or otherwise defend this action within twenty-one (21) days after being served with the Summons and First Amended Complaint in this action in violation of

Federal Rule of Civil Procedure 12(a)(1)(A). Specifically, Defendant was served with copies of the Summons and First Amended Complaint via electronic service authorized by the Court on December 2, 2025, which is reflected in the Return of Summons filed in this case. [Dkt. No. 31] As of the filing of this Motion, more than twenty-one (21) days have expired since electronic service was effectuated on the Defendant. Defaulting Defendant has not answered or otherwise responded to Plaintiff's First Amended Complaint in this action.

5. Plaintiff's asserted claims for relief in this action involve the intentional, willful infringement of the Federally Registered Copyright, VA0002412626. (the "Copyrighted Photo").

6. As alleged in the First Amended Complaint, the Defaulting Defendant has displayed, without authorization, the Copyrighted Photo on the Temu online sales platform (the "Platform") to market and sell products using Plaintiff's authentic Copyrighted Photo through its online stores (the "Online Stores"), thereby deceiving public consumers as to the quality, nature, and source of goods being purchased.

7. Plaintiff is entitled to statutory damages in this action as described in **Exhibit 1** to this Declaration, which shows the Statutory Damages Request based on the copyright infringement. First, the Defaulting Defendant was provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend this action. As a result of the Defaulting 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. This uncertainty supports Plaintiff's requested statutory damages against the Defaulting Defendant.

8. In addition, Defendants in multiple copyright enforcement actions in this judicial district, which includes the Defaulting Defendant, have been acting through their network to actively monitor and post information on the Plaintiff's pending cases on the website

www.SellerDefense.cn. This has apparently been done to advise Defendant in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. These circumstances reveal an overall strategy by all non-appearing Defendants, including the Defaulting Defendant, to simply cut their losses where Plaintiff has a high likelihood of success, abandon their online stores, and bask in the security that any judgment issued against them will almost certainly not be collectable in the Republic of China. Simply put, the Defaulting Defendant is watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district.

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 Defendant for its alleged infringement of the Copyrighted Photo.

10. Such an award precludes the Defaulting Defendant from shielding itself from monetary responsibility for the infringement of the Copyrighted Photo. *Desire, LLC v. Manna Textiles, Inc.*, 986 F.3d 1253, 1264-1272 (9th Cir. 2021). Rather, Plaintiff expressly requests that the Defaulting Defendant, be assessed an enhanced statutory damage award as described in **Exhibit 1** to this Declaration for its infringement of the Copyrighted Photo.

11. Plaintiff has alleged, and has offered proof, that the Defaulting Defendant has engaged in the infringement of the Copyrighted Photo. Moreover, the basic nature of the copyright infringement scheme employed demonstrates that the Defaulting Defendant not only knew of the impropriety of their conduct but had to implement their scheme through sophisticated sources and established supply chains. This is the only possible scenario under which the Defaulting Defendant could immediately procure, without authorization, Plaintiff's copyright protected product images and offer them for sale through their online stores.

12. The presented facts not only establish the Defaulting Defendant's knowledge and intentional infringement of Plaintiff's Copyrighted Photo. Accordingly, Plaintiff should be awarded statutory damages as described in **Exhibit 1** to this Declaration, with enhanced damages against Defaulted Defendant based on their willful infringement of the Copyrighted Photo.

13. My office, with assistance from our client and those assisting our client, investigated the infringing activities of the Defaulting Defendant, including attempting to identify their contact information. Our investigation confirmed that the Defaulting Defendant is primarily domiciled in Asia. As such, I am informed and believe that the Defaulting Defendant is 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 December 26, 2025, in Chicago, Illinois.

By: /s/ Katherine Kuhn
Katherine Kuhn, Esq.
BAYRAMOGLU LAW OFFICES, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of December 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>, and distributed to e-commerce platform, Temu.

By: /s/ Katherine M. Kuhn
Katherine M. Kuhn (Bar No. 6331405)

Store Name	Mall ID	Email
HONG KONG JIBI LIMITED	634418219980101	jzhongshengzhi2024@163.com

Exhibit 1

Wumei Lin v. HONG KONG JIBI LIMITED
1 Defaulted Defendant 1:25-cv-12390

Defendant: HONG KONG TUQING LIMITED

Email: jzhongshengzhi2024@163.com

Copyright Infringed: VA0002412626

Temu Store Name/Defendant Mall ID	Temu Product ID	Copyright Infringed	Statutory Amount Requested	Enhanced for Willful Infringement Total Requested
HONG KONG JIBI LIMITED 634418219980101	601100124113832	VA0002412626	\$5,000.00	\$12,500.00

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
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Wumei Lin,

Plaintiff,

v.

HONG KONG JIBI LIMITED,

Defendant.

Case No. 1:25-cv-12390-EEC-LKM

Honorable Edmond E. Chang

Magistrate Laura K. McNally

**DECLARATION OF WUMEI LIN IN SUPPORT OF PLAINTIFF'S
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Wumei Lin, of Shenzhen City, Guangdong Province 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 Entry of Default and Default Judgment (the "Motion").

3. I am the owner of the photos protected by copyright registration VA0002412626 (the "Copyright Protected Photographs"). I make this declaration from matters within my own personal knowledge unless stated otherwise.

4. I license the Copyright Protected Photographs to certain companies for use in connection with the advertising and sale of clothing and apparel. The Defaulting Defendant is not authorized to reproduce, distribute, or display the Copyright Protected Photographs.

5. Plaintiff seeks an award of statutory damages against the defaulted Defendant (“Defaulting Defendant”) in this action. The Defaulting Defendant is accused of intentionally and willfully infringing Plaintiff’s federally registered copyrights asserted in this action, VA0002412626. (the “Copyright Protected Photographs”).

6. It is without question that the Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Photographs. In this regard, Plaintiff’s Copyright Protected Photographs, without obtaining a license, have appeared on the Defaulting Defendant’s online stores maintained with the Temu Platform (the “Online Stores”).

7. The basic nature of the copyright infringement scheme employed demonstrates that the Defaulting Defendant not only knew of the impropriety of their conduct but had to implement their scheme through sophisticated sources and established supply chains.

8. The Defaulting Defendant has intentionally used the Copyright Protected Photographs for soliciting their product sales without obtaining a license and has never been authorized to use the Copyright Protected Photographs.

9. It is impossible to definitively calculate the Defaulting Defendant’s total sales on the Platform through their Online Stores or to ascertain their expenses related to their infringing sales because they have failed to appear, defend, or otherwise participate in this action.

10. The Defaulting Defendant named in Plaintiff’s copyright infringement enforcement action is engaged in the practice of copying Plaintiff’s copyright protected photographs and then associating these images with sale and promotion of unauthorized products of questionable quality, thereby deceiving consumers – including the citizens of the State of Illinois. Plaintiff maintains that the Defaulting Defendant is acting in concert, pursuant to a common scheme, whereby they copy the Copyright Protected Photographs, without authorization, or such unauthorized images are

being provided by the same common source associated with manufacturing the products being sold on the Defaulting Defendant's Platform storefronts.

11. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendant's unauthorized use of its federally registered copyright protected photographs asserted in this action. This results in the direct harm to Plaintiff's reputation and loss of exclusive licenses, 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 December 26, 2025, in Shenzhen City, Guangdong Province of the People's Republic of China.

By: /s/ Wumei Lin
WUMEI LIN

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of December 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>, and distributed to e-commerce platform, Temu.

By: /s/ Katherine M. Kuhn
Katherine M. Kuhn (Bar No. 6331405)

Store Name	Mall ID	Email
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