

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

**Case No. 1:25-cv-23649-ARTAU/REID**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED IN SCHEDULE  
“A” HERETO,

Defendants.

**PLAINTIFF’S MOTION FOR ENTRY OF CLERK’S DEFAULT**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“Plaintiff”) hereby moves for Entry of Clerk’s Default against Defendant Glozeplus as shown on Schedule “A” to the First Amended Complaint [Dkt. Nos. 8-2, 22-2]. Plaintiff makes this motion on the grounds that the Defaulting Defendant has filed a responsive pleading to the First Amended Complaint within the time prescribed by Federal Rules of Civil Procedure.

On January 12, 2026, the Court authorized electronic service via email on Defendant in connection with the Temporary Restraining Order ("TRO") [Dkt. Nos. 24, 26]. On March 3, 2026, Defendant was served with the Summons and copies of the Complaint and Temporary Restraining Order via electronic mail (“e-mail”) to the email addresses provided by the online marketplace Amazon.com response to request for expedited discovery as permitted by the TRO and via website posting pursuant to the Court’s Order authorizing alternate service of process. (Brees Decl. ¶ 3;

see Dkt. No. 41 Return of Service on file with the Court.) The deadline to respond to the Complaint and Jury Demand (the “Complaint”) [Dkt. No. 1] was March 24, 2026. Brees Decl. ¶ 4.

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 Complaint in this action. As of the filing of this Motion, approximately twenty-eight (28) days have expired since electronic service was effectuated on the Defendant. *Id.* at ¶ 8. To date, the Defendant has not answered or otherwise responded to Plaintiff’s Complaint. *Id.* at ¶ 9.

WHEREFORE, Plaintiff request that default be entered against the Defendant.

DATED: March 31, 2026

Respectfully submitted,

*/s/ William R. Brees*

William R. Brees (FL Bar No. 98886)

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**BAYRAMOGLU LAW OFFICES LLC**

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*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31st day of March 2026, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, Amazon.

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

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SCHEDULE "A" HERETO,

Defendants.

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

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

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

2. On August 26, 2025, Plaintiff filed its First Amended Complaint and Jury Demand [Dkt. No. 8] against Defendants, the Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations identified on Schedule "A" [Dkt. Nos. 8-2, 22-2] ("Defendants").

3. On March 3, 2026, Defendant was served with the Summons and copies of the Complaint and Temporary Restraining Order via electronic mail (“e-mail”) and via website posting pursuant to the Court’s Order authorizing alternate service of process. (See Dkt. No. 41 Return of Service on file with the Court).

4. The deadline to respond to the First Amended Complaint and Jury Demand (the “Complaint”) [Dkt. No. 8] was March 24, 2026.

5. As of the filing of this Motion, approximately twenty-eight days (28) have expired since electronic service was effectuated on the Defendant.

6. The Defendant has failed to answer or otherwise respond to the Complaint or serve a copy of the Answer or other response upon Plaintiff’s attorneys of record.

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

Executed on March 31, 2026, in St. Petersburg, Florida.

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

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Defendants.

**[PROPOSED] ORDER GRANTING PLAINTIFF’S MOTION FOR ENTRY  
OF CLERK’S DEFAULT**

Before the Court is Plaintiff Hong Kong Leyuzhen Technology Co. Limited’s motion for entry of clerk’s default pursuant to Federal Rule of Civil Procedure 55(a) (the “Motion”) against Defendant Glozeplus as shown on Schedule “A” to the First Amended Complaint, which has not filed an answer or otherwise responsive pleading

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

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

\_\_\_\_\_  
HONORABLE ED ARTAU  
UNITED STATES DISTRICT COURT JUDGE