

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

Case No. 1:25-cv-23740-MARTINEZ/SANCHEZ

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
AGAINST CERTAIN DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff"), hereby moves for Entry of Clerk's Default against certain Defendants identified in Schedule "A" to the complaint (collectively, the "Defaulting Defendants") [Dkt. Nos. 1-1, 20-1]. The Defaulting Defendants have been separately listed in **Exhibit 1** to the accompanying Declaration of Willam Brees (the "Brees Decl."). Plaintiff makes this motion on the grounds that the Defaulting Defendants have failed to appear or otherwise respond to the Complaint within the time prescribed by Federal Rules of Civil Procedure.

On December 29, 2026, the Court authorized electronic service via email on Defendants listed in Schedule "A" in connection with the Temporary Restraining Order ("TRO") [Dkt. Nos. 14, 15]. On January 30, 2026, Defendants were served with their respective Summons and copies of the Complaint and Temporary Restraining Order via electronic mail ("e-mail") to the email addresses provided by the online marketplace Amazon.com response to request for expedited

discovery as permitted by the TRO and via website posting pursuant to the Court's Order authorizing alternate service of process. (Brees Decl. ¶ 3; see Dkt. No. 26 Return of Service on file with the Court.) The deadline to respond to the Complaint and Jury Demand (the "Complaint") [Dkt. No. 1] was February 20, 2026. Brees Decl. ¶ 4.

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), the Defaulting Defendants had twenty-one (21) days to answer or otherwise respond to Plaintiff's Complaint in this action. As of the filing of this Motion, approximately twenty-four (24) days have expired since electronic service was effectuated on the Schedule "A" Defendants, which includes the Defaulting Defendants that are the subject of Plaintiff's Motion. *Id.* at ¶ 8. To date, none of the Defaulting Defendants have answered or otherwise responded to Plaintiff's Complaint. *Id.* at ¶ 9.

WHEREFORE, Plaintiff request that default be entered against the Defaulting Defendants, Schedule "A" Nos. 2-3, 5, and 7.

DATED: February 23, 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 23rd day of February 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 AGAINST CERTAIN DEFENDANTS**

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

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

2. On August 19, 2025, Plaintiff filed its Complaint and Jury Demand [Dkt. No. 1] against Defendants, the Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations identified on Schedule "A" [Dkt. Nos. 1-1, 20-1] (collectively, "Defendants").

3. On January 30, 2026, Defendants were 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. 26 Return of Service on file with the Court.)

4. The deadline to respond to the Complaint and Jury Demand (the “Complaint”) [Dkt. No. 1] was February 20, 2026.

5. Defendant No. 1 MANGOUSTARD, Defendant No. 4 Useagrey, Defendant No. 6 ink2055, Defendant No. 8 BeesCops, Defendant No. 9 SperLucky, and Defendant No. 10 weinuoerkeji have been Dismissed from this case. [Dkt. No. 40].

6. The remaining Defendants to whom the Motion for Entry of Clerk’s Default applies are Defendant Nos. 2-3, 5, and 7 (collectively the “Defaulting Defendants”).

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

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

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

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

Executed on February 23, 2026, in St. Petersburg, Florida.

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

Exhibit 1

NO.	SELLER'S NAME	LINK TO SELLER'S WEBSITE
2	PEHMEA	https://www.amazon.com/sp?ie=UTF8&seller=A2CB96A8THXVUR&asin=B0B4WFLBW2&ref_=dp_merchant_link&isAmazonFulfilled=1
3	YUENCH Online	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A36FBKRK2QWVKJ&asin=B0CPD8NTHL&ref_=dp_merchant_link
5	XOOPIT	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A36PEAQ9B6LCI4&asin=B0CKTNBV5P&ref_=dp_merchant_link
7	Butterfly Island	https://www.amazon.com/sp?ie=UTF8&seller=A7KKYW5MJMVM9&asin=B0D921WHKG&ref_=dp_merchant_link

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Defendants.

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

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

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

IT IS SO ORDERED.

DATED: _____

HONORABLE JOSE E. MARTINEZ
UNITED STATES DISTRICT COURT JUDGE

DEFAULTING DEFENDANTS

NO.	SELLER'S NAME	LINK TO SELLER'S WEBSITE
2	PEHMEA	https://www.amazon.com/sp?ie=UTF8&seller=A2CB96A8THXVUR&asin=B0B4WFLBW2&ref_=dp_merchant_link&isAmazonFulfilled=1
3	YUENCH Online	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A36FBKRK2QWVKJ&asin=B0CPD8NTHL&ref_=dp_merchant_link
5	XOOPIT	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A36PEAQ9B6LCI4&asin=B0CKTNBV5P&ref_=dp_merchant_link
7	Butterfly Island	https://www.amazon.com/sp?ie=UTF8&seller=A7KKYW5MJMVM9&asin=B0D921WHKG&ref_=dp_merchant_link