

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

CASE NO. 1:25-cv-23740

HONG KONG LEYUZHEN
TECHNOLOGY CO. LIMITED,

Plaintiff,

v.

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

Defendants.

COMPLAINT AND JURY DEMAND

Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, ("Plaintiff"), hereby files its Complaint for damages and injunction relief for copyright infringement against the Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations identified on Schedule "A" hereto (collectively, the "Defendants") and in support of its claims states as follows:

NATURE OF THE ACTION

1. Plaintiff is the owner of all rights, title and interest in and to the Copyright registrations issued by the United States Copyright Office for certain images related to its Rotita Brand product line (the "Rotita Brand") used in connection with the promotion and sale of women's apparel, which bear the federal registration numbers [REDACTED]

[REDACTED] (the "Rotita Copyrights").

2. Plaintiff has filed this action against the Defendants who damage Plaintiff's reputation, goodwill, and valuable copyrights, including the Rotita Copyrights. They sell competing products of inferior quality and falsely claim they are authentic Rotita Brand products by displaying the Rotita Copyrights without permission on their online storefronts (the "Online Stores") on the Amazon marketplace (the "Platform").

3. Plaintiff exclusively uses the Rotita Copyrights for advertising, displaying, and selling its genuine Rotita Brand products on its fully owned, operated, and controlled company website. Plaintiff does not advertise, market, display, or sell its authentic Rotita Brand products on the Platform.

4. The Defendants also advertise, market, and/or sell their competing products that use the same items displayed in Plaintiff's Rotita Copyrights, referencing the same photographs associated with genuine Rotita Brand products, which causes confusion and deception in the marketplace.

5. Unique identifiers common to the Defendants' Online Stores, such as design elements and similarities in their unlawful use of the Rotita Copyrights, establish a logical link between them and suggest that the Defendants' illegal activities stem from the same transaction, series of transactions, or occurrences.

6. The Defendants' unlawful use of the Rotita Copyrights related to the same clothing collection indicates that the Defendants all procured the images at the same time from the same sources for use with identical or nearly identical competing products.

7. The above conclusion is further supported by evidence and admissions made by similar online copyright infringers that have been the subject of numerous other enforcement actions brought by Plaintiff. This evidence and admissions include, but are not limited to, similarly

situated defendants stating that they obtained Plaintiff's Rotita Copyrights from the same sources, that the sourcing of their competing products was secured from the same manufacturing source, and that identical supply chains were employed to fulfill consumer orders.

8. Plaintiff is compelled to file this action to address the Defendants' unauthorized use of its Rotita copyrights to sell inferior competing products, as well as to protect uninformed consumers from purchasing competing products online, believing they are Plaintiff's genuine products.

9. Plaintiff has been and continues to be irreparably harmed through consumer confusion, dilution, and tarnishment of the Rotita Brand's reputation and goodwill due to the Defendants' actions, and therefore seeks injunctive and monetary relief.

JURISDICTION AND VENUE

10. This Court has original subject matter jurisdiction over the claims in this action under 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.

11. This Court has supplemental jurisdiction over the unfair deceptive trade practices claim in this action that arise under the laws of the State of Florida under 28 U.S.C. § 1367(a) because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

12. This Court may exercise personal jurisdiction over each Defendant because they directly target business activities toward consumers across the United States, including Florida, through their Online Stores on the Platform, Amazon, listed in Schedule "A" attached as **Exhibit 1**. Specifically, the Defendants have aimed their sales at the United States by operating these e-commerce stores that target U.S. consumers, offering to ship within the United States, accepting

payment in U.S. dollars, and selling products using Plaintiff's federally registered copyright. Furthermore, the common law violations under Florida law provide a basis for long-arm jurisdiction over each Defendant under Florida Statutes §§ 48.193(1)(a) and 48.193(1)(b), as each Defendant has committed torts within Florida through unfair competition with Plaintiff.

13. Each Defendant is properly subject to jurisdiction in the United States because each is a foreign entity with sufficient contacts here, as they systematically offer infringing items through the Platform. This consistent offering of infringing items for sale makes it reasonably foreseeable that they could be called to answer in a court within the United States, ensuring that the exercise of jurisdiction in this Court complies with due process.

14. Venue is proper in this district under 28 U.S.C. § 1391 because the Defendants are subject to this Court's personal jurisdiction and none of the Defendants, based on a pre-suit investigation, are residents of the United States. Each Defendant is engaged in infringing activities and causing harm within the Southern District of Florida by advertising, offering to sell, selling and/or shipping infringing products to consumers in this district. This Court is the proper jurisdiction and venue under Federal Rule of Civil Procedure 4(k).

THE PARTIES

Plaintiff

15. Plaintiff is a corporation organized under the laws of the People's Republic of China ("China") and owns the Rotita Copyrights alleged to have been infringed in this case by the Defendants. Attached as **Exhibit 2** is a true and correct copy of the federal copyright registrations issued for the Rotita Copyrights and the Copyright Public Records Data.

16. Plaintiff established its Rotita Brand in 2009, focusing on women's fashion apparel and serving consumers in the United States and worldwide.

17. In 2019, Plaintiff designed, caused to be materialized, and first published the Rotita Copyrights on its website, which is located at the company's official website using the Rotita Brand in its URL. Over the years, the Plaintiff has worked hard to establish success and recognition for high-quality women's apparel internationally and in the United States.

18. Plaintiff has invested significant time, money, and resources into developing, advertising, and promoting its Rotita Brand and specifically the Rotita Copyrights. Consequently, the Rotita Brand is widely recognized and exclusively associated by consumers, the public, and the trade as representing quality products.

19. Plaintiff owns all rights, including, but not limited to, the rights to reproduce the Rotita Copyrights in copies, to create derivative works based on the copyrighted works, and to distribute copies of the copyrighted works to the public through sale or other transfer of ownership, or by rental, lease, or lending of the protected works.

20. Plaintiff has neither licensed nor authorized the Defendants to use the Rotita Copyrights, and none of the Defendants are authorized retailers of the Plaintiff's genuine Rotita Brand products.

Defendants

21. Defendants are individuals and business entities of unknown corporate organization and/or structure, who own and/or operate one or more of the Online Stores on the Platform as identified on Schedule "A".

22. Based on the Plaintiff's pre-suit investigation of the addresses linked to the Online Stores on the Platform, the Defendants live and/or operate outside the United States. On information and belief, the Defendants distribute products from the same or similar sources in those locations and/or ship their goods from those sources to consumers.

23. Defendants conduct business across the United States, including in Florida and within this judicial district, through the operation of their Online Stores listed in Schedule “A.” They have offered to sell, and, based on information and belief, have sold and continue to sell, knock-off Rotita Brand products.

24. Some of the Defendants’ sales are made to consumers within this judicial district by displaying the Rotita Copyrights on their Online Stores without authorization. **Exhibit 3** provides links to infringing uses of the Rotita Copyrights on each of the Defendants’ Online Stores.

25. As revealed through Plaintiff’s other copyright infringement enforcement actions, the Defendants infringing the Rotita Copyrights have access to these copyrighted works from the same or interconnected source. Furthermore, the Defendants’ sales operations use the same textile manufacturing sources, which provide identical fabrics and patterns used in the authentic Rotita Brand products offered by Plaintiff, and they utilize the same distribution networks to fulfill retail orders for their competing products.

26. Plaintiff’s pre-suit investigation has revealed that many of the Defendants have provided false or inaccurate business names and addresses when they registered for their Online Stores.

27. Inaccurate address information and other tactics are used to hide the Defendants’ true identities, the full extent of their infringing activities, and their connection to the other Defendants, making it almost impossible for Plaintiff to uncover the Defendants’ true identities and the interworking of their infringement network operates.

28. Most third-party online marketplace platforms, like Amazon, do not require new sellers to undergo verification or confirm their identities, which allows infringers to use fake or

false names, business details, and addresses when setting up their e-commerce stores on these platforms.

29. Third-party online marketplace platforms generally do not require sellers to disclose an underlying business entity; therefore, infringers can set up multiple profiles and e-commerce stores that seem unrelated but are owned and operated by the same entity.

30. Defendants are accused of working together through a coordinated scheme or network that infringes on Plaintiff's Rotita copyrights, which depict authentic Rotita Brand products. They use these copyrights in advertising inferior, unauthorized products sold through their online stores, with the intent to deceive consumers into believing that their purchases come from a genuine and authorized source.

31. In furtherance of their concerted acts or conspiracy, the Defendants have sold infringing products by unlawfully using the Plaintiff's Rotita Copyrights, relying on one or more common supply chain sources and/or manufacturers that provide the Defendants with textile products matching those offered by the Plaintiff, which could not be individually fabricated by the Defendants.

32. Additionally, based on admissions made in one or more other pending proceedings, the Defendants are believed to have also obtained unauthorized versions of the Plaintiff's Rotita Copyrights from the same, similar, or related sources associated with the distribution and/or manufacture of the infringing products offered for sale to consumers as authentic, authorized versions of the Plaintiff's Rotita Brand, and publishing those versions within the same frame, indicating they all were acquired from the same or similar sources.

33. Based on the foregoing, Plaintiff asserts that each of the Defendants is jointly and severally liable for all claims for relief asserted herein based on information and belief that they are acting in concert or acting pursuant to a conspiracy.

34. Given the allegations in Paragraph 33, Plaintiff claims that all actions described here were part of the same series of transactions involving the unauthorized acquisition of Plaintiff's Rotita Copyrights, the improper display of these copyrights on Defendants' Online Stores to deceive consumers about the authenticity of the products, the use of standard supply chains and manufacturers, and the unauthorized procurement of Plaintiff's Rotita Copyrights from the same, similar, or related sources.

DEFENDANTS' UNLAWFUL CONDUCT

35. The success of Plaintiff's Rotita Brand has led to counterfeiting and deliberate copying of the company's products, as well as the sale and offering for sale of these products through and in connection with the unauthorized use of the Rotita Copyrights.

36. In this case, by unauthorized use of the Rotita Copyrights on their online stores, the Defendants published the Rotita Copyrights on their storefronts, directly contributing to, inducing, and engaging in the infringement of the copyrights as alleged, often acting as partners, co-conspirators, and/or suppliers.

37. Based on information and belief, Defendants are a connected group of infringers working together to knowingly and intentionally use the Rotita Copyrights without permission to manufacture, import, distribute, offer for sale, and sell inferior competing products.

38. Based on the information and belief, Defendants have had full knowledge of Plaintiff's ownership of the Rotita Copyrights, including the exclusive right to use and license the Rotita Brand and its associated goodwill.

39. Plaintiff has identified numerous stores on the Platform, including Defendants' Online Stores, which are offering for sale, selling, and importing infringing products to consumers in this judicial district and throughout the United States by using, without authorization, the Rotita Copyrights.

40. Infringers on e-commerce marketplace platforms, such as Defendants' Online Stores, are estimated to receive tens of millions of visits annually and to generate over \$135 billion in online sales each year. According to an intellectual property rights seizures statistics report issued by the United States Department of Homeland Security, the manufacturer's suggested retail price ("MSRP") of goods seized by the U.S. government in fiscal year 2020 was over \$1.3 billion. Websites like Defendants' Online Stores are also estimated to cause tens of thousands of lost jobs for legitimate businesses and result in broader economic damages, such as lost tax revenue each year.

41. Similar infringing defendants boost sales by opening online stores on reputable third-party marketplace platforms such as Amazon, Walmart, eBay, and others, and operate under seller aliases to appear as authorized online retailers to unsuspecting customers.

42. In this case, the Internet stores operating under these seller aliases appear to be legitimate and authorized sellers of genuine Rotita Brand products because they function on the well-known and trusted platform Amazon.

43. Defendants' stores accept payment in US dollars.

44. Defendants deceive unaware consumers by using Plaintiff's Rotita copyrights on their online stores without permission to attract customers and sell counterfeit products that resemble authentic Rotita Brand items.

45. Defendants in similar infringement cases deceive unsuspecting consumers by using the infringed intellectual property in the same way as it was initially used in connection with the sale of genuine products.

46. Defendants incorporate Plaintiff's intellectual property into their website content, text, and/or meta tags to attract search engines that crawl the Internet, seeking websites relevant to consumer product searches.

47. Defendants in similar cases use other unauthorized search engine optimization (SEO) tactics and social media spam to make sure their internet store listings show up at or near the top of relevant search results, misleading consumers looking for genuine products. Additionally, these infringers use similar illegitimate SEO methods to promote new domain names to the top of search results after others are taken down.

48. Here, a search for the Rotita Brand women's dresses on the platform resulted in the unauthorized use of the Rotita Copyrights to promote competing, inferior products. As such, the plaintiff also seeks to disable the defendants' online stores, which display the Rotita Copyrights without permission, to prevent them from selling knockoff products to consumers in this judicial district.

49. On information and belief, Defendants conceal their identities by using multiple fictitious names and addresses to register and operate a massive network of Internet stores.

50. It is common for infringers to register accounts with incomplete information, random letters, or missing details like cities or states; use privacy services that hide the owners' identities and contact info; and regularly create new websites and online marketplace accounts across various platforms. These seller alias registration patterns are just one of many tactics used

by internet store operators like the Defendants to hide their identities and the full scope of their infringement operations, as well as to avoid shutdowns.

51. Operating under various seller aliases also creates the impression that the Defendants are multiple, separate entities when listed on a Schedule “A” enforcement action. By making it seem like the seller aliases are all unrelated entities, infringers like the Defendants know they are creating a potential joinder issue for any multi-defendant enforcement effort, thus further complicating enforcement.

52. The Defendants’ intentional technique of hiding behind multiple seller aliases to make enforcement more difficult is used to perpetuate illegal infringement activities.

53. Without joinder of each Defendant, the Defendants’ strategy to dodge liability will be effective because individual lawsuits are expensive to file and burden the courts.

54. Each Defendant is included in this action because it is highly likely that they are collaborating with the other Defendants or are not separate entities, and that they are only listed as separate entities to evade enforcement of U.S. and copyright law.

55. Each of the Defendants unfairly profits by operating amid a group of other infringers, each individually and collectively violating Plaintiff’s Copyrighted Protected Images and/or misusing e-commerce. This is a tactic infringers use to avoid enforcement efforts, allowing their operations to continue because the swarm is too large to target individually. When one is shut down, the infringer can open five more and transfer money among them if they are aware of this suit.

56. Upon receiving notice of a lawsuit, infringers in similar cases often register new domain names or online marketplace accounts under different aliases. They also typically ship products in small quantities via international mail to avoid detection by U.S. Customs and Border

Protection. A 2021 U.S. Customs and Border Protection (“CBP”) report on seizure statistics showed that e-commerce sales made up 13.3% of total retail sales, with second-quarter 2021 retail e-commerce sales estimated at \$222.5 billion. In FY 2021, there were 213 million express mail shipments and 94 million international mail shipments. *Id.* Nearly 90 percent of all intellectual property seizures happen in the international mail and express environments. *Id.* at 27. The “overwhelming volume of small packages also makes CBP’s ability to identify and interdict high-risk packages difficult.” *Id.* at 23.

57. Further, infringers often operate multiple credit card merchant accounts and third-party accounts behind layers of payment gateways so that they can continue operating despite enforcement efforts.

58. Upon information and belief, Defendants maintain offshore bank accounts and regularly transfer funds from their Platform accounts to offshore bank accounts outside this Court’s jurisdiction, particularly since it is believed that Defendants reside in China.

59. Each Defendant has provided a Chinese business address on its Online Store.

60. The Defendants’ Online Stores, bear similarities and indicia of interrelatedness.

61. Notable features common to Defendants’ Online Stores include the lack of contact information, similar or identical products for sale, matching or similar prices and discounts, shared hosting services, comparable name servers, and their collective infringement of Plaintiff’s Rotita Copyrights.

62. The Defendants’ use of Plaintiff’s Rotita Copyrights in connection with the advertising, marketing, distribution, offering for sale, and the sale of competing products of inferior quality is likely to cause and has caused confusion, mistakes, and deception among consumers and is irreparably damaging the goodwill and intrinsic value of the Rotita Brand.

63. Unless temporarily, preliminarily, and permanently restrained by this Court, the Defendants' infringing conduct will continue to cause irreparable harm to Plaintiff.

64. Defendants, without authorization or license from Plaintiff, knowingly and willfully used and continue to use the company's Rotita Copyrights in connection with the advertisement, offer for sale, and sale of counterfeit and/or knockoff Rotita Brand products through, among other things, their Online Stores listed in Schedule "A".

65. Upon information and belief, Defendants will continue to infringe Plaintiff's Rotita Copyrights to sell inferior knockoff products unless preliminarily and permanently enjoined.

COUNT I

COPYRIGHT INFRINGEMENT (17 U.S.C. § 101, et seq.)

66. Plaintiff repeats, realleges and incorporates by reference herein its allegations contained in paragraphs 1 through 65, above.

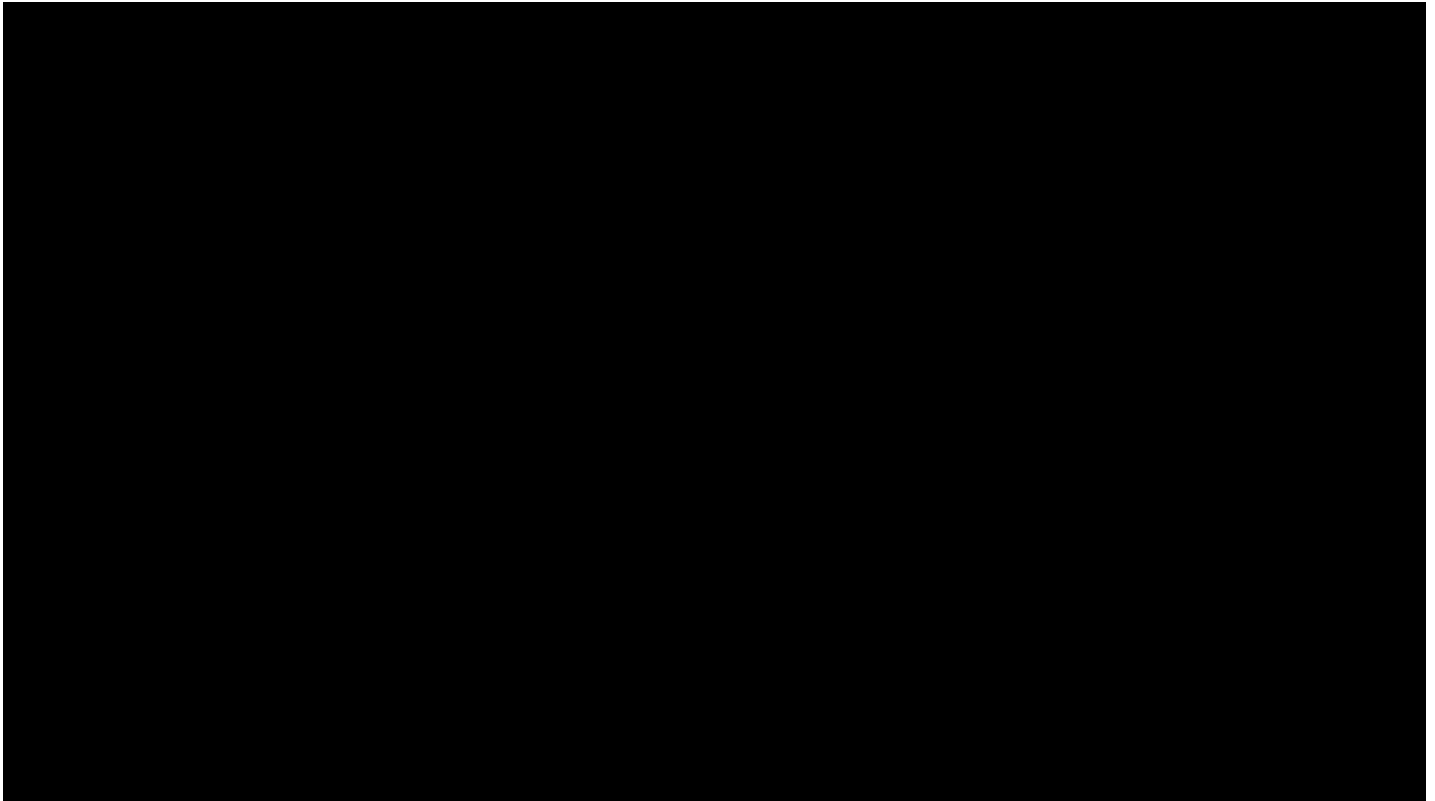
67. Plaintiff's Rotita copyrights hold significant value and have been produced and created at considerable expense.

68. Plaintiff owns all exclusive rights, including, but not limited to, the rights to reproduce the Rotita Copyrights in copies, to create derivative works based on the copyrighted work, and to distribute copies of the copyrighted work to the public through sale, transfer of ownership, rental, lease, or lending.

69. The Defendants have sold, offered to sell, marketed, distributed, and advertised, and are still selling, offering to sell, marketing, distributing, and advertising products using the Rotita Copyrights without Plaintiff's permission, authorization, consent, or license.

70. The Defendants have directly copied the Rotita Copyrights and used them, without authorization, to advertise, promote, offer for sale, and sell competing products of low quality and at a fraction of the price.

71. As examples, the Defendants deceive unknowing consumers by using, without authorization, the Rotita Copyrights on Defendants' Online Stores to attract customers as follows:



72. The Defendants' unauthorized exploitation of Rotita Copyrights to advertise, offer for sale and sell inferior products on Defendants' Online Stores constitutes copyright infringement.

73. On information and belief, the Defendants' infringing acts are willful, deliberate, and committed with prior notice and knowledge of the Rotita Copyrights.

74. Each Defendant either knew, or should have reasonably known, that the Rotita Copyrights are subject to federal copyright protection.

75. Each Defendant continues to infringe upon Plaintiff's rights in and to the Rotita Copyrights.

76. As a direct and immediate result of their unauthorized and infringing actions, Defendants have gained and continue to profit from both direct and indirect benefits that rightfully belong to Plaintiff, which they would not have obtained without infringing on Plaintiff's Rotita Copyrights.

77. The acts of infringement described above constitute a coordinated and conspiratorial effort involving overlapping actions carried out in concert, all of which have been willful, intentional, and done with disregard for or indifference to the rights of the Plaintiff. Therefore, the Defendants, and each of them, should be held jointly and severally liable.

78. Based on the above allegations in Paragraph 77, Plaintiff seeks an award of damages under 17 U.S.C. § 504.

79. In addition to actual damages, Plaintiff is entitled to receive the profits made by the Defendants from their wrongful acts, pursuant to 17 U.S.C. § 504(b).

80. Each Defendant should be required to account for all gains, profits, and advantages derived by each Defendant from their acts of infringement.

81. In the alternative, Plaintiff is entitled to and may elect to choose statutory damages under 17 U.S.C. § 504(c), which should be enhanced by 17 U.S.C. § 504(c)(2) because of Defendants' willful copyright infringement.

82. Plaintiff is entitled to and may elect to choose injunctive relief under 17 U.S.C. § 502, enjoining any use or exploitation by the Defendants of their infringing work and for an order under 17 U.S.C. § 503 that any of the Defendants' infringing products be impounded and destroyed.

83. Plaintiff seeks and is also entitled to recover reasonable attorneys' fees and costs of suit under 17 U.S.C. § 505.

84. Plaintiff has no adequate remedy at law, and, if the Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to the reputation and goodwill of their well-known Rotita Brand.

85. The conduct of each Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured monetarily.

86. Per paragraph 85, Plaintiff has no adequate remedy at law.

87. The aforementioned allegations entitle Plaintiff to injunctive relief under 17 U.S.C. §§502 and 503.

88. Plaintiff is entitled to injunctive relief prohibiting each Defendant from further infringing the Rotita Copyrights and ordering that each Defendant destroy all unauthorized copies. Defendants' copies, plates, and other embodiments of the copyrighted works from which copies can be reproduced, if any, should be impounded and forfeited to Plaintiff as instruments of infringement, and all infringing copies created by Defendants should be impounded and forfeited to Plaintiff, under 17 U.S.C §503.

COUNT II

VIOLATION OF THE FLORIDA DECEPTIVE AND UNFAIR TRADE PRACTICES ACT

(Fla. Stat. § 501.201)

89. Plaintiff repeats, realleges, and incorporates by reference herein its allegations contained in paragraphs 1 through 65, above.

90. Defendants have engaged in acts violating Florida law, including, but not limited to:

A: passing off their infringing products as those of Plaintiff's Rotita Brand products through the unauthorized use of the Rotita Copyrights, thereby causing a likelihood of confusion and/or misunderstanding as to the source of their goods, causing a likelihood of confusion and/or misunderstanding as to an affiliation, connection, or association with genuine Rotita Brand products; and

B: Falsely representing that their products have Plaintiff's approval when they do not and engaging in other conduct which creates a likelihood of confusion or misunderstanding among the public.

91. Moreover, the Defendants have used, without authorization, Plaintiff's Rotita Copyrights in promoting Defendants' Online Stores by displaying them in connection with offering for sale the infringing inferior products by deceiving consumers into believing said products are authentic Rotita Brand products.

92. The foregoing acts of the Defendants constitute a willful violation of the Florida Deceptive and Unfair Trade Practices Act, Fla. Stat. § 501.201, et seq.

93. Plaintiff is entitled to the recovery of damages, attorneys' fees, and costs as authorized by statute.

94. Plaintiff has no adequate remedy at law, and the Defendants' conduct has caused Plaintiff to suffer damage to its Rotita Brand's reputation and goodwill. Unless enjoined by the Court, Plaintiff will continue to suffer future irreparable harm as a direct result of the Defendants' unlawful activities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against the Defendants and each of them as follows:

1. That the Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:

a. using Plaintiff's Rotita Copyrights or any reproductions, counterfeit copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Rotita Brand product or is not authorized by Plaintiff to be sold in connection with its registered copyrights;

b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Rotita Brand product or any other product produced by Plaintiff by using the Rotita Copyrights to sell and offer for sale such products that are not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff;

c. committing any acts calculated to cause consumers to believe that Defendants' inferior products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff or its Rotita Brand;

d. further infringing the Rotita Copyrights and damaging Plaintiff's Rotita Brand's reputation and goodwill;

e. otherwise competing unfairly with Plaintiff through the unauthorized use of the Rotita Copyrights in any manner;

f. shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory sold or offered for sale through the unauthorized use of the Rotita Copyrights;

g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendants' stores on the Defendants' Online Stores or the Platform, or any other domain name or online marketplace account that is being used to sell or is the means by which the Defendants could continue to sell infringing Rotita Brand products through the unauthorized use of the Rotita Copyrights; and

h. operating and/or hosting websites at the Defendants' Internet stores and any other domain names registered or operated by the Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product through the unauthorized use of the Rotita Copyrights.

2. That the Defendants, within fourteen (14) days after service of judgment with notice of entry thereof upon them, be required to file with the Court and serve upon Plaintiff a written report under oath setting forth in detail the manner and form in which the Defendants have complied with paragraph 1 above.

3. Entry of an Order that, upon Plaintiff's request, those in privity with the Defendants and those with notice of the injunction, including AliExpress, Walmart, Amazon, DHgate, eBay, Temu, and Wish, social media platforms such as Facebook, YouTube, Instagram, TikTok, LinkedIn, X, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendants' Online Stores, and domain name registrars ("Third Party Providers"), shall:

a. disable and cease providing services for any accounts through which the Defendants engage in the sale of knockoff Rotita Brand products by using, without authorization, the Rotita Copyrights, including any accounts associated with the Defendants listed on Schedule "A";

b. disable and cease displaying any advertisements used by or associated with

Defendants that display the Rotita Copyrights; and

c. take all necessary steps to prevent links to the Defendants' Online Stores identified on Schedule "A" from displaying in search results, including, but not limited to, removing links to Defendants' domain names from any search index.

4. That the Defendants account for and pay to Plaintiff all profits realized by them through the unauthorized use of the Rotita Copyrights.

5. In the alternative, that Plaintiff be awarded statutory damages of not less than \$750 and not more than \$30,000 for every infringement of the Rotita Copyrights under 17 U.S.C. § 504(c), which should be enhanced to a sum of not more than \$150,000 by 17 U.S.C. § 504(c)(2) because of the Defendants' willful copyright infringement.

6. That the Defendants, to the extent not enjoined for violation of the Copyright Act, be temporarily, preliminarily, and permanently enjoined under Fla. Stat. § 501.201, et seq.

7. That Plaintiff be awarded attorneys' fees and costs damages as authorized by statute under Fla. Stat. § 501.201, et seq.

8. That Plaintiff be awarded its reasonable attorneys' fees and costs.

9. Award any other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff also demands a trial by jury of all issues so triable under Federal Rule of Civil Procedure 38.

Dated: August 19, 2025,

Respectfully Submitted

By: /s/ Joshua H. Sheskin

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Attorneys for Plaintiff

EXHIBIT 1
FILED
UNDER SEAL

EXHIBIT 2
FILED
UNDER SEAL

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED

Plaintiff(s)

v.

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

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

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

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Joshua H. Sheskin (FL Bar No. 93028)
Joshua@bayramoglu-legal.com
BAYRAMOGLU LAW OFFICES LLC
11540 W. Warm Springs Rd., Ste 100
Henderson, NV 89014
T: (702) 462-5973

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date:

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

EXHIBIT 3
FILED
UNDER SEAL

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provide by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.) NOTICE: Attorneys MUST Indicate All Re-filed Cases Below.

I. (a) PLAINTIFFS

Hong Kong Leyuzhen Technology Co. Limited

(b) County of Residence of First Listed Plaintiff (EXCEPT IN U.S. PLAINTIFF CASES)

(c) Attorneys (Firm Name, Address, and Telephone Number) Joshua H. Sheskin (FL Bar No. 93028) BAYRAMOGLU LAW OFFICE LLC 11540 W. Warm Springs Road, Suite 100 Henderson, NV 89014; (704) 462-5973

(d) Check County Where Action Arose: MIAMI-DADE MONROE BROWARD PALM BEACH MARTIN ST. LUCIE INDIAN RIVER OKEECHOBEE HIGHLANDS

DEFENDANTS

The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

County of Residence of First Listed Defendant (IN U.S. PLAINTIFF CASES ONLY)

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED. Attorneys (If Known)

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

- 1 U.S. Government Plaintiff
2 U.S. Government Defendant
3 Federal Question (U.S. Government Not a Party)
4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

- Citizen of This State
Citizen of Another State
Citizen or Subject of a Foreign Country
PTF DEF
1 1 Incorporated or Principal Place of Business In This State
2 2 Incorporated and Principal Place of Business In Another State
3 3 Foreign Nation
4 4
5 5
6 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Grid of categories: CONTRACT, TORTS, FORFEITURE/PENALTY, LABOR, IMMIGRATION, REAL PROPERTY, CIVIL RIGHTS, PRISONER PETITIONS, INTELLECTUAL PROPERTY RIGHTS, SOCIAL SECURITY, FEDERAL TAX SUITS, OTHER STATUTES. Includes sub-sections like PERSONAL INJURY, PERSONAL PROPERTY, HABES CORPUS, etc.

V. ORIGIN

- 1 Original Proceeding
2 Removed from State Court
3 Re-filed (See VI below)
4 Reinstated or Reopened
5 Transferred from another district (specify)
6 Multidistrict Litigation Transfer
7 Appeal to District Judge from Magistrate Judgment
8 Multidistrict Litigation - Direct File
9 Reremanded from Appellate Court

VI. RELATED/ RE-FILED CASE(S)

(See instructions): a) Re-filed Case YES NO b) Related Cases YES NO

JUDGE:

DOCKET NUMBER:

VII. CAUSE OF ACTION 17 U.S.C. section 501 - Copyright Infringement

Cite the U.S. Civil Statute under which you are filing and Write a Brief Statement of Cause (Do not cite jurisdictional statutes unless diversity):

LENGTH OF TRIAL via days estimated (for both sides to try entire case)

VIII. REQUESTED IN COMPLAINT:

CHECK IF THIS IS A CLASS ACTION UNDER F.R.C.P. 23 DEMAND \$ CHECK YES only if demanded in complaint:

JURY DEMAND: Yes No

ABOVE INFORMATION IS TRUE & CORRECT TO THE BEST OF MY KNOWLEDGE

DATE SIGNATURE OF ATTORNEY OF RECORD

August 19, 2025

/s/ Joshua H. Sheskin

INSTRUCTIONS FOR ATTORNEYS COMPLETING CIVIL COVER SHEET FORM JS 44

Authority For Civil Cover Sheet

The JS 44 civil cover sheet and the information contained herein neither replaces nor supplements the filings and service of pleading or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. Consequently, a civil cover sheet is submitted to the Clerk of Court for each civil complaint filed. The attorney filing a case should complete the form as follows:

I. (a) Plaintiffs-Defendants. Enter names (last, first, middle initial) of plaintiff and defendant. If the plaintiff or defendant is a government agency, use only the full name or standard abbreviations. If the plaintiff or defendant is an official within a government agency, identify first the agency and then the official giving both name and title.

(b) County of Residence. For each civil case filed, except U.S. plaintiff cases, enter the name of the county where the first listed plaintiff resides at the time of filing. In U.S. plaintiff cases, enter the name of the county in which the first listed defendant resides at the time of filing. (NOTE: In land condemnation cases, the county of residence of the "defendant" is the location of the tract of land involved.)

(c) Attorneys. Enter the firm name, address, telephone number, and attorney of record. If there are several attorneys, list them on an attachment, noting in this section "(see attachment)".

II. Jurisdiction. The basis of jurisdiction is set forth under Rule 8(a), F.R.C.P., which requires that jurisdictions be shown in pleadings. Place an "X" in one of the boxes. If there is more than one basis of jurisdiction, precedence is given in the order shown below.
 United States plaintiff. (1) Jurisdiction based on 28 U.S.C. 1345 and 1348. Suits by agencies and officers of the United States are included here.
 United States defendant. (2) When the plaintiff is suing the United States, its officers or agencies, place an "X" in this box.
 Federal question. (3) This refers to suits under 28 U.S.C. 1331, where jurisdiction arises under the Constitution of the United States, an amendment to the Constitution, an act of Congress or a treaty of the United States. In cases where the U.S. is a party, the U.S. plaintiff or defendant code takes precedence, and box 1 or 2 should be marked. Diversity of citizenship. (4) This refers to suits under 28 U.S.C. 1332, where parties are citizens of different states. When Box 4 is checked, the citizenship of the different parties must be checked. (See Section III below; federal question actions take precedence over diversity cases.)

III. Residence (citizenship) of Principal Parties. This section of the JS 44 is to be completed if diversity of citizenship was indicated above. Mark this section for each principal party.

IV. Nature of Suit. Nature of Suit. Place an "X" in the appropriate box. If there are multiple nature of suit codes associated with the case, pick the nature of suit code that is most applicable. Click here for: [Nature of Suit Code Descriptions](#).

V. Origin. Place an "X" in one of the seven boxes.

Original Proceedings. (1) Cases which originate in the United States district courts.

Removed from State Court. (2) Proceedings initiated in state courts may be removed to the district courts under Title 28 U.S.C., Section 1441. When the petition for removal is granted, check this box.

Refiled (3) Attach copy of Order for Dismissal of Previous case. Also complete VI.

Reinstated or Reopened. (4) Check this box for cases reinstated or reopened in the district court. Use the reopening date as the filing date.

Transferred from Another District. (5) For cases transferred under Title 28 U.S.C. Section 1404(a). Do not use this for within district transfers or multidistrict litigation transfers.

Multidistrict Litigation. (6) Check this box when a multidistrict case is transferred into the district under authority of Title 28 U.S.C. Section 1407. When this box is checked, do not check (5) above.

Appeal to District Judge from Magistrate Judgment. (7) Check this box for an appeal from a magistrate judge's decision.

Remanded from Appellate Court. (8) Check this box if remanded from Appellate Court.

VI. Related/Refiled Cases. This section of the JS 44 is used to reference related pending cases or re-filed cases. Insert the docket numbers and the corresponding judges name for such cases.

VII. Cause of Action. Report the civil statute directly related to the cause of action and give a brief description of the cause. **Do not cite jurisdictional statutes unless diversity.** Example: U.S. Civil Statute: 47 USC 553

Brief Description: Unauthorized reception of cable service

VIII. Requested in Complaint. Class Action. Place an "X" in this box if you are filing a class action under Rule 23, F.R.Cv.P.

Demand. In this space enter the dollar amount (in thousands of dollars) being demanded or indicate other demand such as a preliminary injunction.

Jury Demand. Check the appropriate box to indicate whether or not a jury is being demanded.

Date and Attorney Signature. Date and sign the civil cover sheet.

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of Florida

HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED

Plaintiff(s)

v.

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

Defendant(s)

Civil Action No.

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

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

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Joshua H. Sheskin (FL Bar No. 93028)
Joshua@bayramoglu-legal.com
BAYRAMOGLU LAW OFFICES LLC
11540 W. Warm Springs Rd., Ste 100
Henderson, NV 89014
T: (702) 462-5973

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: _____

Signature of Clerk or Deputy Clerk

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. _____

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

This summons for *(name of individual and title, if any)* _____
was received by me on *(date)* _____.

I personally served the summons on the individual at *(place)* _____
_____ on *(date)* _____; or

I left the summons at the individual's residence or usual place of abode with *(name)* _____
_____, a person of suitable age and discretion who resides there,
on *(date)* _____, and mailed a copy to the individual's last known address; or

I served the summons on *(name of individual)* _____, who is
designated by law to accept service of process on behalf of *(name of organization)* _____
_____ on *(date)* _____; or

I returned the summons unexecuted because _____; or

Other *(specify)*:

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00 _____.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc: