

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

WUMEI LIN,

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-12661-MSS

Honorable Manish S. Shah

**PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT
AGAINST THE IDENTIFIED SCHEDULE “A” DEFENDANTS**

Plaintiff Wumei Lin. (“Plaintiff”) hereby moves for entry of Default and Default Judgment against the following Defendants, as identified by Defendant number and name in Schedule A attached below and separately listed in Exhibit "1" to the accompanying Declaration of Joseph W. Droter (the "Droter Decl."). Plaintiff files a Memorandum of Law in support. Plaintiff’s Motion for Entry of Default and Default Judgment disposes of the case.

DATED: December 9, 2025

Respectfully Submitted,

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC
233 S. Wacker Drive, 44th Floor, #57
Chicago, IL 60606
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joseph@bayramoglu-legal.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December 2025, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, Temu.

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC

| Defendant No. | Seller's Name | Seller Email Address |
|----------------------|---|--------------------------------|
| 1 | HONG KONG MUJUN LIMITED dba Ykrhwox | choumeikulian0807@163.com |
| 2 | Hong Kong Lu Xing Co., Limited dba Pflqltz | gekuaiby4@163.com |
| 3 | Hong Kong Balemei Limited dba SNSJDZV | songwennuantaiyang@hotmail.com |
| 4 | HONG KONG SHENGMIOU LIMITED dba Zaohohn Zekedwl | mubuzhuanjing0807@163.com |
| 5 | HONGKONG BUF AN TECHNOLOGY LIMITED dba Shaofeiyi Danzier | xiayuebubai@outlook.com |
| 6 | HONG KONG HUIXINBA LIMITED dba Vovtujx | xingxingyinyue2024@126.com |
| 7 | HONG KONG Y ALE LIMITED dba zanpyiv | silkenskein@hotmail.com |
| 8 | HONG KONG XINGSHEN LIMITED dba Dfhdjus | zhaimenda@163.com |
| 9 | HONG KONG BA OHU A LIMITED dba iyqtlldo | z9234ras@163.com |
| 10 | HONG KONG XUJI LIMITED dba Kszuwhj Pctmfmf | mayachigua@yeah.net |
| 11 | Shenzhenshiyayuefeidianzishangwu Co., Ltd. dba ZASDFGE | wopegv@126.com |
| 12 | Hong Kong Daoshi Limited dba Fsuyhd | ajdhjdhhhi@163.com |

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

WUMEI LIN,

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-12661-MSS

Honorable Manish S. Shah

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

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 identified Schedule "A" Defendants (collectively, the "Defaulting Defendants"), which have been separately listed in Exhibit "1" to the accompanying Declaration of Joseph W. Droter (the "Droter Decl."). Plaintiff's Motion is made and based upon this Memorandum of Law, the Droter Declaration, 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 all remaining defendants.

I. INTRODUCTION

On November 3, 2025, the Court authorized electronic service via email on the Schedule "A" Defendants [Dkt. No. 17]. Plaintiff completed service on all named Defendants on November

12, 2025, and filed a Return of Service [Dkt. No. 20]. The deadline to respond to the First Amended Complaint was December 3, 2025.

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

II. LEGAL STANDARD

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 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 Defendants have publicly displayed unlicensed and unauthorized reproductions of Plaintiff's Copyright Protected Images on the Temu online sales platform (the "Platform") to market and sell competing products using Plaintiff's Copyright Protected Photographs. Thereby deceiving public consumers as to the quality, nature, and source of goods being purchased. (Droter Decl. ¶ 6.) Moreover, the Defaulting Defendants are 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, approximately twenty-two days (22) 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. (Droter Decl. ¶ 4.) To date, none of the Defaulting Defendants have 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 Defendants.

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 defendants are 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 Defendants have willfully and intentionally infringed Plaintiff's Copyright Protected Photographs, 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 Defendants since each of the Defendants directly targets business activities toward consumers in Illinois and causes harm to Plaintiff's business within this judicial district. [Dkt. No. 11 at 7-12]; *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 Defendants are 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. 11 at 48-64]. All Defendants, which includes the Defaulting Defendants, were properly served with the First Amended Complaint, Summons, and all supporting documents via electronic service on November 12, 2025. [Dkt. No. 20] The Defaulting Defendants 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 Defendants were required to answer or otherwise respond to the First Amended Complaint on or before December 3, 2025. [*Id.*] As of the filing of this Motion, approximately twenty-two (22) 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. (Droter Decl. ¶ 4.) To date, none of the Defaulting Defendants have answered or otherwise responded to Plaintiff's First Amended Complaint. (*Id.*) Accordingly, the Clerk of the Court is compelled to enter default and default judgment pursuant to Rule 55 against the Defaulting Defendants.

C. Plaintiff is Entitled to Entry of the Requested Default Judgment

A default judgment establishes, as a matter of law, that named, unresponsive defendants are liable 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 defendants 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 Defendants were served, and no answer or other responsive pleading has been filed by any of the Defaulting Defendants identified in Schedule "A." *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 Defendants: (1) an award of \$5,000 in statutory damages and profits per 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); (3) entry of a permanent injunction pursuant to 17 U.S.C. § 502(a); and (4) alternatively, entry of a permanent injunction pursuant to 815 ILCS § 510/3.

1. Plaintiff is entitled to statutory damages under 17 U.S.C. § 504(c)(1).

Plaintiff is entitled to such relief for the Defaulting Defendants' infringement of the company's Copyright Protected Images, which it maintains was done willfully and intentionally. (Droter 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 Copyright Protected Photographs. 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 Copyright Protected Images in its First Amended Complaint [Dkt. No. 11] and has supplied the Court with a summary of all registrations issued by the United States Copyright Office [Dkt. No. 11, Ex. 1]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulting Defendants have infringed the company's Copyright Protected Images. [Dkt. No. 11-3, 12-3.] Therefore, the Defaulting Defendants have infringed the company's Copyright Protected Images.

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 Defendants' 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. (*Id.* ¶ 7.)

Specifically, Plaintiff has neither obtained, nor are the Defaulting Defendants participating in these proceedings, so that the Court can be provided with the infringers' deductible expenses related to the sale of the competing products associated with the unauthorized use and public display of Plaintiff's Copyright Protected Photographs. *See* 17 U.S.C. § 504(b). As such, there is no verifiable information concerning the Defaulting Defendants' gross infringing sales of their competing products using Plaintiff's copyrights or the associated deductible expenses from same. (Droter Decl. ¶ 7.) Moreover, Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendants' 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 Defendants' conduct, Plaintiff asserts that it is entitled to an award of \$5,000 in statutory damages against each Defaulting Defendant and submits a Defendant-by-Defendant analysis showing each

Defaulting Defendant, the copyright infringed, and the enhanced statutory damages requested. (Droter Decl. ¶ 12, Exhibit. 1.)

In this case the Defaulting Defendants were provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend. (Droter Decl. ¶ 7). As a result of the Defaulting Defendants' intentional decision not to appear and defend this action, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual damages. (*Id.*) The Defaulting Defendants have intentionally used the Copyright Protected Images for soliciting their competing product sales without obtaining a license and have never been authorized to use the Copyright Protected Photographs. (Lin Decl. ¶ 8) It is impossible to definitively calculate the Defaulting Defendants' 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. (*Id.* ¶ 9) These facts unquestionably support Plaintiff's request statutory damages per infringed Copyright Protected Image per Defaulted Defendant.

The actions of the Defaulting Defendants' infringement clearly support awarding the requested statutory damage award against them. It is without question that the Defaulting Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. In this regard, Plaintiff's Copyright Protected Photographs, without a license, have appeared on the Defaulting Defendants' online stores maintained with the Platform. (Lin Decl. ¶ 6.) These actions by the Defendants, justify an award of statutory damages. Plaintiff respectfully requests the Court award statutory damages for copyright infringement under 17 U.S.C. § 504(c)(1) in an amount not less than \$5,000.00 per Defaulting Defendant per infringed Copyright Protected Image. (Droter Decl. ¶ 12, Ex. 1)

2. Plaintiff is entitled to enhanced statutory damages.

Here, the Defaulting Defendants' infringement clearly supports awarding an enhanced statutory damage award against them. The Defaulting Defendants' infringing conduct in this action are willful, thereby justifying enhanced damages under 17 U.S.C. § 504(c)(2). Defaulting Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Images. (Droter Decl. ¶ 5, 12.) Plaintiff's Copyright Protected Photographs, without obtaining a license, have appeared on each the Defaulting Defendants' online stores maintained with the Platform. (Lin Decl. ¶ 6.) The Defaulting Defendants have clearly been operating their online stores using the unauthorized and unlicensed Copyright Protected Photographs. Upon information and belief, the Defaulting Defendants, have been acting through their network to actively monitor and post information on the Plaintiff's pending cases on the website www.SellerDefense.cn. (Droter Decl. ¶ 8.) This has apparently been done to advise defendants 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 Defendants, 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. (Droter 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 Defendants on the grounds that they should serve as a deterrent to future conduct. *Id.* at 1229-30. Here, the Defaulting Defendants are watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Droter 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 each alleged infringement of the Copyright Protected Images. (*Id.* ¶ 9.) The Defaulting Defendants have 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 Defendants, and all other similar infringers, that they will incur substantial liability for their actions. In doing so, hopefully the Defaulting Defendants, or other similar infringers monitoring this case, will post this anticipated award on the www.SellerDefense.cn 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 Defaulted Defendant per infringed Copyright Protected Image, which should be enhanced to \$12,500 for willful infringement per Defaulted Defendant per infringed Copyright Protected Work, pursuant to 17 U.S.C. § 504(c)(2). A Defendant-by-Defendant request analysis is provided as Exhibit 1 to the Droter Declaration. (Droter 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 defendants fail to respond or appear, courts have consistently granted permanent injunctions as part of default judgments, particularly when there is evidence of ongoing or likely future infringement. 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 Defendants have 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 Defendants, 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 Images.

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 Defendants.

CONCLUSION

Under Rule 55(b)(2), Plaintiff respectfully requests this Court for entry of a default judgment finding the Defaulting Defendants liable on all counts asserted in Plaintiff's First Amended Complaint. [Dkt. No. 11.] These asserted counts include claims for Copyright

Infringement (Count I) [Dkt. No. 11 at 48-64.] In granting its request, Plaintiff asks the Court to award the following: (1) \$5,000 in statutory damages per Defaulting Defendant per infringed Copyright pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced statutory damages of \$12,500 per Defaulting Defendant per infringed Copyright Protected Image based on their willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) issuance of a permanent injunction against the Defaulting Defendants pursuant to 17 U.S.C. § 502(a); and (4) such other relief as the Court deems just and proper.

DATED: December 9, 2025

Respectfully Submitted,

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC
233 S. Wacker Drive, 44th Floor, #57
Chicago, IL 60606
Tel: (702) 462-5973 Fax: (702) 553-3404
joseph@bayramoglu-legal.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December 2025, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, Temu.

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
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WUMEI LIN,

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-12661-MSS

Honorable Manish S. Shah

**DECLARATION OF JOSEPH W. DROTER IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Joseph W. Droter, 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 Default and Default Judgment (the “Motion”) against the identified Schedule “A” Defendants (collectively, the “Defaulting Defendants”), which have been separately listed in Exhibit “1” to the Motion.

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 my matters within my own knowledge unless stated otherwise.

4. I hereby certify that the Defaulting Defendants (as defined in the accompanying Memorandum) have 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, all Schedule “A” Defendants were served with copies of the Summons and First Amended Complaint via electronic service authorized by the Court on November 12, 2025, which is reflected in the Return of Summons filed in this case. [Dkt. No. 20] As of the filing of this Motion, approximately twenty-two (22) 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. None of the identified Defaulting Defendants have 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 following Federally Registered Copyright: VA0002412626. (the “Copyright Protected Images”).

6. As alleged in the First Amended Complaint, the Defaulting Defendants have displayed, without authorization, the Copyright Protected Images on the Temu online sales platform (the “Platform”) to market and sell competing products using Plaintiff’s authentic Copyright Protected Images through their 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 Defendants were provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend this action. As a result of the Defaulting

Defendants' intentional decision not to appear and defend this action, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual damages. 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 Defendants, 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 defendants in all pending actions of Plaintiff's successful prosecution of its claims, and the viability of appearing and asserting potential defenses. These circumstances reveal an overall strategy by all non-appearing defendants, including the Defaulting Defendants, to simply cut their losses where Plaintiff has a high likelihood of success, abandon their online store, 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 Defendants are 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 Defendants for each alleged infringement of the Copyright Protected Images.

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

11. Plaintiff has alleged, and has offered proof, that the Defaulting Defendants have engaged in the infringement of the Copyright Protected Images. Moreover, the basic nature of the copyright infringement scheme employed demonstrates that the Defaulting Defendants 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 Defendants 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 Copyright Protected Images. Accordingly, Plaintiff should be awarded statutory damages as described in **Exhibit 1** to this Declaration, with treble the enhancement against Defaulted Defendants based on their willful infringement of the Copyright Protected Images.

13. My office, with assistance from our client and those assisting our client, investigated the infringing activities of the Defaulting Defendants, including attempting to identify their contact information. Our investigation confirmed that the Defaulting Defendants are primarily domiciled in Asia. As such, I am informed and believe that the Defaulting Defendants are not active-duty members of the U.S. armed forces.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 9th, 2025

By: /s/ Joseph W. Droter
Joseph W. Droter
BAYRAMOGLU LAW OFFICES, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 9th day of December 2025, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, Temu.

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC

12 Defaulted Defendants 1:25-cv-12661

Exhibit 1

12 Defaulted Defendants 1:25-cv-12661

| No. | Temu Store Name/Defendant | Seller Contact | Copyright Infringed | Statutory Amount Requested | Enhanced for Willful Infringement Total Requested |
|-----|--|------------------------------------|---------------------|----------------------------|---|
| 1 | HONG KONG MUJUN LIMITED dba Ykrhwox | choumeikulian0807 @163.com | VA0002412626 | \$5,000 | \$12,500 |
| 2 | Hong Kong Lu Xing Co., Limited dba Pflqtlz | gekuaiby4@163.com | VA0002412626 | \$5,000 | \$12,500 |
| 3 | Hong Kong Balemei Limited dba SNSJDZV | songwennuantaiyang @hotmail.com | VA0002412626 | \$5,000 | \$12,500 |
| 4 | HONG KONG SHENGMIOU LIMITED dba Zaohohn Zekedwl | mubuzhuanjing0807 @163.com | VA0002412626 | \$5,000 | \$12,500 |
| 5 | HONGKONG BUF AN TECHNOLOGY LIMITED dba Shaofeyi Danzier | xiayuebubai@outloo k.com | VA0002412626 | \$5,000 | \$12,500 |
| 6 | HONG KONG HUIXINBA LIMITED dba Vovtujx | xingxingyinyue2024 @126.com | VA0002412626 | \$5,000 | \$12,500 |
| 7 | HONG KONG Y ALE LIMITED dba zanpyiv | silkenskein@hotmail. com | VA0002412626 | \$5,000 | \$12,500 |
| 8 | HONG KONG XINGSHEN LIMITED dba Dfhdjus | zhaimenda@163.com | VA0002412626 | \$5,000 | \$12,500 |
| 9 | HONG KONG BA OHU A LIMITED dba iyqtlldo | z9234ras@163.com | VA0002412626 | \$5,000 | \$12,500 |

12 Defaulted Defendants 1:25-cv-12661

| No. | Temu Store Name/Defendant | Seller Contact | Copyright Infringed | Statutory Amount Requested | Enhanced for Willful Infringement Total Requested |
|------------|---|-----------------------|----------------------------|-----------------------------------|--|
| 10 | HONG KONG XUJI LIMITED dba Kszuwjh Pctmfmf | mayachigua@yeah.net | VA0002412626 | \$5,000 | \$12,500 |
| 11 | Shenzhenshiyayuefeidi anzishangwu Co., Ltd. dba ZASDFGE | wopegv@126.com | VA0002412626 | \$5,000 | \$12,500 |
| 12 | Hong Kong Daoshi Limited dba Fsuyhd | ajdhjdhhhi@163.com | VA0002412626 | \$5,000 | \$12,500 |
| | | | TOTAL: | | \$150,000.00 |

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

WUMEI LIN,

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-12661-MSS

Honorable Manish S. Shah

**DECLARATION OF WUMEI LIN IN SUPPORT OF PLAINTIFF’S
MOTION FOR 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 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 my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff licenses the Copyright Protected Photographs to certain companies for use in connection with the advertising and sale of clothing and apparel. The Defaulting Defendants are no authorized to reproduce, distribute, or display the Copyright Protected Photographs.

5. Plaintiff seeks an award of statutory damages against all defaulted Schedule “A” Defendants (the “Defaulting Defendants”) in this action. The Defaulting Defendants are accused of intentionally and willfully infringing Plaintiff’s following federally registered copyrights asserted in this action: VA0002412626. (the “Copyright Protected Photographs”).

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

7. The basic nature of the copyright infringement scheme employed demonstrates that the Defaulting Defendants 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 Defendants have intentionally used the Copyright Protected Images for soliciting their competing product sales without obtaining a license and have never been authorized to use the Copyright Protected Photographs.

9. It is impossible to definitively calculate the Defaulting Defendants’ 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 Defendants named in the company’s copyright infringement enforcement actions are 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 Defendants are acting in concert, pursuant to a common scheme, whereby they copy the copyright protected images, without authorization, or such unauthorized images are being provided by the same common source associated with manufacturing the competing products being sold on the Defaulting Defendants’ Platform storefronts.

11. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendants’ unauthorized use of its federally registered copyright protected photographs asserted in this action. 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.

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

Executed on December 9th, 2025, in Shenzhen City, Guangdong Province of the People’s Republic of China.

By: Wumei Lin
WUMEI LIN

CERTIFICATE OF SERVICE

I hereby certify that on the 9th 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 <https://blointernetenforcement.com/>, and distributed to ecommerce platform, Temu.

By: /s/ Joseph W Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC