

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

HONG KONG DONGYE LIMITED,

Defendant.

Case No. 1:25-cv-13974-MSS-KLHH

Honorable Manish S. Shah

Magistrate Keri L. Holleb Hotaling

NOTICE OF MOTION

PLEASE TAKE NOTICE that on Wednesday, January 7, 2025, at 9:45 a.m., Plaintiff, by and through its counsel, the Bayramoglu Law Offices, LLC, will present Plaintiff's Motion for Entry of Default and Default Judgment (Docket No. 18) shall appear in-person in courtroom 1919 before the Honorable Manish S. Shah, of the U.S. District Court for the Northern District of Illinois.

DATED: December 30, 2025

Respectfully submitted,

By: /s/ Joseph W. Droter

Joseph W. Droter (Bar No. 6329630)

Katherine M. Kuhn (Bar No. 6331405)

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

Katherine@bayramoglu-legal.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 30th 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.

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
Attorney for Plaintiff