

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

**Case No.: 1:25-cv-22562-MARTINEZ/Sanchez**

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

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

Defendants.

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

Plaintiff, Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff") hereby moves for the Entry of Clerk's Default against the Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations (the "Defendants") identified in Schedule "A" to the Complaint (Dkt. No. 1-1), as the Defendants have failed to appear or otherwise respond to the Complaint within the time specified by the Federal Rules of Civil Procedure.

On November 10, 2025, the Court authorized electronic service via email on the Defendants [Dkt. No. 18]. On November 26, 2025, the Defendants were served with the Summons and copies of the Complaint and Temporary Restraining Order through electronic mail ("e-mail") to the email addresses provided by the online marketplace Walmart.com as authorized by this Court. (Dkt. No. 21) The deadline to respond to the Complaint and Jury Demand (the "Complaint") was December 17, 2025.

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), the Defendants had twenty-one (21) days to answer or respond to the Complaint. As of the filing of this Motion, approximately twenty-seven (27) days have passed since electronic service was completed on the Defendants and to date Defendant have not responded to the Complaint.

WHEREFORE, Plaintiff requests that a clerk's default be entered against the Defendants.

DATED: December 23, 2025

Respectfully submitted,

/s/ William R. Brees

William R. Brees (FL Bar No. 98886)

william@bayramoglu-legal.com

**BAYRAMOGLU LAW OFFICES LLC**

11540 W. Warm Springs Rd., Ste 100

Henderson, NV 89014

Tel: (702) 462 – 5973

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 23<sup>rd</sup> day of Decembert 2025, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to Defendant via email sent to the address provided by the Marketplace Platforms in response to the TRO. Further, this email to Defendants contains a link to the posting of the filing on a URL contained on our website <http://blointernetenforcement.com>.

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

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**DECLARATION OF WILLIAM R. BREES IN SUPPORT OF PLAINTIFF'S MOTION FOR  
ENTRY OF CLERK'S DEFAULT AGAINST CERTAIN DEFENDANTS**

I, William R. Brees, 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 June 4, 2025, Plaintiff filed its Complaint and Jury Demand (the "Complaint") [Dkt. No. 1] against Defendants, the Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations identified on Schedule "A" [Dkt. No. 1-1] (collectively, "Defendants").

3. On November 26, 2025, 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. 21 Return of Service on file with the Court.)

4. The deadline to respond to the Complaint was December 17, 2025.

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

6. As of the filing of this Motion, approximately twenty-seven days (27) have expired since electronic service was effectuated on the Schedule “A” Defendants.

7. The 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.

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

Executed on December 23<sup>rd</sup>, 2025, in St. Petersburg, Florida.

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

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

Before the Court is Plaintiff Hong Kong Leyuzhen Technology Co. Limited's motion for entry of clerk's default against the Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations ("Defendants") under Federal Rule of Civil Procedure 55(a) for not appearing, through the filing of an answer or otherwise responsive pleading.

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

**IT IS SO ORDERED.**

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

\_\_\_\_\_  
HONORABLE JOSE E. MARTINEZ  
UNITED STATES DISTRICT COURT JUDGE