

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

HONG KONG LEYUZHEN
TECHNOLOGY CO. LIMITED,

Plaintiff,

v.

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

Defendants.

Case No.: 25-cv-14663-MFK-MV

Honorable Matthew F. Kennelly

Magistrate Maria Valdez

**PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT
AND DEFAULT JUDGMENT AGAINST THE DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”) hereby moves for entry of Default and Default Judgment against THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE “A” HERETO (“Defendants”). Plaintiff files herewith a Memorandum of Law in support, Declaration of Joseph W. Droter, and Declaration of Liangjie Li. Plaintiff’s Motion for entry of Default Judgment disposes of the case.

DATED: February 5, 2026

Respectfully Submitted,

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)
Katherine M. Kuhn (Bar No. 6331405)
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February 2026, 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, SHEIN.

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)

Store Name	Link to Seller’s Website
CORSKI	https://us.shein.com/store/home?store_code=5385839846&ici=PageGoodsDetail&main_cate_id=12478&main_goods_id=42363717&rule_poskey=DetailShopItemList&src_identifier=on%3Dstore%60cn%3DCORSKI%60hz%3D0%60ps%3D1_1%60jc%3DthirdPartyStoreHome_5385839846&src_module=DetailBrand&src_tab_page_id=page_goods_detail1749631168338&tab=items
DYDAWN	https://us.shein.com/store/home?store_code=2506678819&main_cate_id=12476&main_goods_id=32308832&src_identifier=on%3Dstore%60cn%3DDYDAWN%60hz%3D0%60ps%3D1_1%60jc%3DitemPicking_undefined&src_module=DetailBrand&src_tab_page_id=page_goods_detail1749622037170&tab=items
Fancy Boutique	https://us.shein.com/store/home?store_code=2293809565&main_cate_id=12476&main_goods_id=33135961&src_identifier=on%3Dstore%60cn%3DFancy%20Boutique%60hz%3D0%60ps%3D1_1%60jc%3DitemPicking_undefined&src_module=DetailBrand&src_tab_page_id=page_goods_detail1749624498265&tab=items

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HONG KONG LEYUZHEN
TECHNOLOGY CO. LIMITED,

Plaintiff,

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

Defendants.

Case No. 1:25-cv-14663-MFK-MV

Honorable Matthew F. Kennelly

Magistrate Maria Valdez

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR ENTRY OF
DEFAULT AND DEFAULT JUDGMENT AGAINST THE DEFENDANTS**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("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 INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE "A" HERETO (the "Defaulting Defendants" or "Defendants"). Plaintiff's Motion is made and based upon this Memorandum of Law, the Declaration of Joseph W. Droter ("Droter Decl."), the Declaration of Liangjie Li (the "Li 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 the case.

I. INTRODUCTION

Plaintiff's request for entry of default is straightforward. On December 31, 2025, the Court authorized electronic service via email on the Defendants in connection with issuing Plaintiff's Motion requesting same [Dkt. No. 16]. Plaintiff completed service on Defendant and filed a Return of Service on January 13, 2026 [Dkt. No. 24]. The deadline to respond to the Complaint was February 3, 2026.

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A) ("Rule 12(a)(1)(A)"), the Defaulting Defendants had twenty-one (21) days to answer or otherwise respond to Plaintiff's Complaint in this action. To date, the Defaulting Defendants have not answered or otherwise responded to Plaintiff's Complaint. (Droter Decl. ¶ 4). The Clerk of the Court should be compelled to enter default pursuant to Rule 55(a) against the Defaulting Defendant.

Pursuant to Rule 55(b)(2), Plaintiff now also respectfully moves this Court for entry of a default judgment finding the Defaulting Defendants liable on all counts asserted in Plaintiff's Complaint [Dkt. No. 1]. These asserted counts include claims for Copyright Infringement (Count I) [*Id.*]. In connection with its asserted claims for relief, Plaintiff seeks an award of statutory damages pursuant to 17 U.S.C. § 504(c) against the Defaulting Defendants for each infringement of the Copyright Protected Images, which should be enhanced for their willful infringement of the following federally registered copyrights asserted in this action: VA0002379888, VA0002386556, and VA0002413197 (the "Copyright Protected Photographs"). (Droter Decl. ¶ 5). Plaintiff additionally requests the Court issue a permanent injunction against the Defaulting Defendants. *See* 17 U.S.C. § 502(a).

As alleged in the Complaint, the Defaulting Defendants have displayed, without authorization, the Copyright Protected Photographs on SHEIN's online sales platform (the

“Platform”) to market and sell competing products using Plaintiff’s authentic Rotita 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 product network that utilizes a common supply chain and manufacturing source to fulfill consumer orders for competing Rotita brand products by displaying, without authorization, Plaintiff’s Copyright Protected Photographs on their online storefronts. (Droter Decl. ¶ 11). These circumstances clearly demonstrate that the Defaulting Defendants have willfully and intentionally infringed Plaintiff’s Copyright Protected Photographs, thereby supporting Plaintiff’s request for enhanced statutory damages under the Copyright Act.

Procedurally, Rule 55(b)(2) provides for a court-ordered default judgment which establishes, as a matter of law, that defendants are liable to plaintiff on each cause of action alleged in the complaint. *United States v. Di Mucci*, 879 F.2d 1488, 1497 (7th Cir. 1989). 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). Plaintiff meets the requirements for entry of the requested default judgment under Rule 55(b)(2).

II. 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. 1]. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants since the Defendants directly target business activities toward consumers in Illinois and causes harm to Plaintiff’s business

within this judicial district. [*Id.*]; *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). Accordingly, 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.

On December 2, 2025, Plaintiff filed its Complaint in this action alleging, among other claims, Copyright Infringement (Count I). On December 31, 2025, this Court authorized electronic service [Dkt. No. 16]. Defendants, which were properly served with the Complaint and all supporting documents via electronic service on January 13, 2026. [Dkt. No. 24]. Specifically, the Defaulting Defendants were required to answer or otherwise respond to the Complaint on or before February 3, 2026. [*Id.*]. As such, the Defaulting Defendants had twenty-one (21) days to answer or otherwise respond to Plaintiff’s complaint pursuant to Rule 12(a)(1)(A). To date, the Defaulting Defendants have not answered or otherwise responded to Plaintiff’s Complaint. (Droter Decl. ¶ 4). Accordingly, the Clerk of the Court should be compelled to enter default pursuant to Rule 55 against the Defaulting Defendants.

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

Rule 55(b)(2) of the Federal Rules of Civil Procedure generally provides for entry of a court-ordered default judgment against one or more defending parties that failure to appear, answer,

and/or defend allegations asserted against them. Fed.R.Civ.P. 55(b)(2). 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.

More than twenty-one (21) days have passed since Defendants were served, and no answer or other responsive pleading has been filed by the Defaulting Defendants. *See* Fed. R. Civ. P. 12(a)(1)(A). Thus, default judgment is appropriate, and Plaintiff is entitled to entry of a default judgment pursuant to Rule 55(b)(2) against the Defaulting Defendants for copyright infringement, as asserted in the Complaint. [1 at 16-25].

As argued below, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the Defaulting Defendants: (1) an award of statutory damages and profits of \$5,000.00 per copyright infringed for copyright infringement under 17 U.S.C. § 504(c)(1); (2) an award of enhanced statutory damages of \$10,000.00 per copyright infringed for willful infringement pursuant to 17 U.S.C. § 504(c)(2); and (3) entry of a permanent injunction pursuant to 17 U.S.C. § 502(a).

D. Plaintiff is Entitled to the Relief Requested.

Through entry of default, Plaintiff has established that Defaulting Defendants are liable for intentionally and willfully infringing the Copyright Protected Photographs. As such, the following issues remain to be adjudicated through the Motion: (1) Plaintiff's entitlement to an award of statutory damages for infringement of the Copyright Protected Photographs; (2) Plaintiff's request that any statutory damage award be enhanced based on the Defaulting Defendant's willful

copyright infringement; and (3) Plaintiff's right to issuance of a permanent injunction against the Defaulting Defendants. Plaintiff asserts that it is entitled to all relief requested through its Motion.

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

Turning first to the request for an award of statutory damages under 17 U.S.C. § 504(c)(1) against the Defaulting Defendants. Plaintiff is entitled to such relief for the Defaulting Defendant's infringement of Plaintiff's Copyright Protected Photographs, which it maintains was done willfully and intentionally. (Droter Decl. ¶ 11).

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).

First, Plaintiff has asserted a viable claim for infringement of the 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 Photographs

in its Complaint [Dkt. No. 1] and has supplied the Court with a summary of all registrations issued by the United States Copyright Office [Dkt. No. 1-1 and 2]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulting Defendants have infringed Plaintiff's Copyright Protected Photographs. [Dkt. 1-2]. Accordingly, Plaintiff has established that the Defaulting Defendants have infringed Plaintiff's Copyright Protected Photographs.

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.

Plaintiff has established unquestionably viable copyright infringement claims in this case. The Defaulting Defendant's refusal to appear and defend against the asserted claims, however, has deprived Plaintiff of the ability to present evidence concerning verifiable infringing sales or costs associated with such sales. (Droter Decl. ¶ 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 display of Plaintiff's Copyright Protected Photographs. *See* 17 U.S.C. § 504(b). As such, there is no verifiable

information concerning the Defaulting Defendant's gross infringing sales of their competing products or the associated deductible expenses from same. (Droter Decl. ¶ 7). Plaintiff has requested \$5,000 per copyright infringed be entered against Defendants, enhanced to \$10,000 per copyright infringed and attached its breakdown as **Exhibit 1** to the Droter Declaration filed herewith. (Droter Decl., Exhibit 1). Accordingly, 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 Defendant's conduct, Plaintiff asserts that it is entitled to an award of statutory damages in the amounts requested in **Exhibit 1** of the Droter Declaration in this action. (Droter Decl. ¶ 7, 12, Exhibit 1). First, 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 Defendant's 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.*).

Moreover, Plaintiff has expended considerable capital in securing registration of the Copyright Protected Photographs and advertising its brand in the United States and in the State of Illinois. (Li. Decl. ¶ 9). This includes spending over \$80,000 to secure the company's copyright registrations with the United States Copyright Office and spending approximately \$8,000,000 to \$12,000,000 annually to advertise and promote its Rotita brand in the United States. (*Id.*). These facts unquestionably support Plaintiff's request for an award in statutory damages against the Defaulted Defendants.

Next, the circumstances of the Defaulting Defendant's 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 Photographs. In this regard, Plaintiff's Copyright Protected Photographs, often representing product line releases, have appeared on the Defaulting Defendant's online stores maintained with the Platform. (Li Decl. ¶ 7). Moreover, the Defaulting Defendants have unquestionably been operating their online stores using the misappropriated Copyright Protected Photographs through sophisticated sources and established supply chains. (Droter Decl. ¶, 11). Accordingly, the Defaulting Defendants unquestionably, intentionally, and willfully infringed Plaintiff's Copyright Protected Photographs to sell their competing products, thereby justifying an award of statutory damages.

Based on the foregoing, Plaintiff respectfully requests the Court award statutory damages against the Defaulting Defendants for the SHEIN competing products, which shows infringement of the Copyright Protected Photographs. As set forth in Plaintiff's supporting documentation, the Defaulting Defendants in this action should be found liable for \$5,000 per copyright infringed for statutory damages, which should be enhanced because of their willful infringements of the Copyright Protected Photographs. (Droter Decl. ¶ 12, Exhibit 1). Accordingly, Plaintiff respectfully requests the Court an award of \$10,000 in statutory damages for copyright infringement under 17 U.S.C. § 504(c)(1) against Defaulting Defendants. (Droter Decl. ¶ 12).

2. Plaintiff is entitled to enhanced statutory damages.

Next, the circumstances of the Defaulting Defendant's infringement clearly support awarding an enhanced statutory damage award of, at least, enhanced damages against them. Simply put, the Defaulting Defendant's infringing conduct in this action is unquestionably willful, thereby justifying enhanced damages under 17 U.S.C. § 504(c)(2).

It is without question that the Defaulting Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Photographs. (Droter Decl. ¶, 11). In this regard, Plaintiff's Copyright Protected Photographs, often representing recent product releases, have appeared on the Defaulting Defendant's online stores maintained with the Platform. (Li Decl. ¶ 7). Moreover, the Defaulting Defendants have clearly been operating their online stores using the misappropriated Copyright Protected Photographs through sophisticated sources and established supply chains. (Droter Decl. ¶ 11).

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. (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 strategy by all non-appearing defendants, including the Defaulting Defendants, to simply cut their losses where Plaintiff has a high likelihood of success, abandon any online platform restrained funds, and bank 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. Simply put, the Defaulting Defendants are watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Droter Decl. ¶ 8). Defaulting Defendants, as with other similarly situated defendants, have simply taken the apparent position

that any recovery issued by a court is only executable against their restrained asserts on the named online platform. (*Id.*). This conduct demonstrates an intentional wiliness 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 reward on the www.SellersDefense.cn website as notice of the consequences for their intentional, and orchestrated actions.

Based on the foregoing, Plaintiff respectfully requests the Court award enhanced statutory damages of not less than the requested statutory damages, \$10,000 per copyright infringed. As set forth in Plaintiff's supporting documentation **Exhibit 1** to the Droter Declaration, the Defaulting Defendants in this action should be found liable because of their willful infringement of the Copyright Protected Photographs. (Droter Decl. ¶ 12, Exhibit 1). Accordingly, Plaintiff respectfully requests the Court enter an award of \$5,000.00 per copyright infringed against Defendants, in statutory damages, which should be enhanced for willful infringement to \$10,000.00 per copyright infringed against Defendants, pursuant to 17 U.S.C. § 504(c)(2).

3. Plaintiff is entitled to a permanent injunction.

Next, Plaintiff is entitled to entry of a permanent injunction against the Defaulting Defendants. 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, 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 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 Copyright Protected Photographs.

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

Based on the foregoing, Plaintiff respectfully requests entry of default and default judgment against the Defaulting Defendants pursuant to Rule 55. In granting its request, Plaintiff asks the Court to award the following: (1) statutory damages of \$5,000.00 per copyright infringed against

Defaulting Defendants pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced statutory damages of \$10,000.00 per copyright infringed against Defaulting Defendants 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: February 5, 2026

Respectfully submitted,

By: /s/ Joseph W. Droter

Joseph W. Droter (Bar No. 6329630)

Katherine M. Kuhn (Bar No. 6331405)

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February 2026, 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, SHEIN.

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)

Store Name	Contact
CORSKI	truman1925@outlook.com
DYDAWN	sheinsjxabc@163.com
Fancy Boutique	yihang181@163.com

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

HONG KONG LEYUZHEN
TECHNOLOGY CO. LIMITED,

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-14663-MFK-MV

Honorable Matthew F. Kennelly

Magistrate Maria Valdez

**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 against THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE "A" HERETO (the "Defaulting Defendants" or "Defendants").

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 Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”). I make this declaration from 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 Complaint in this action in violation of Federal Rule of Civil Procedure 12(a)(1)(A). Specifically, Defendants were served with copies of the Summons and Complaint via electronic service authorized by the Court on January 13, 2025, which is reflected in the Return of Summons filed in this case [Dkt. No. 24]. To date, Defaulting Defendants have not answered or otherwise responded to Plaintiff’s 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 protected images: VA0002379888, VA0002386556, and VA0002413197 (the “Copyright Protected Photographs”).

6. As alleged in the Complaint, the Defaulting Defendants have displayed, without authorization, the Copyright Protected Photographs on SHEIN’s online sales platform (the “Platform”) to market and sell competing products using Plaintiff’s authentic Rotita Copyright Protected Photographs through their online store (the “Online Store”), thereby deceiving public consumers as to the quality, nature, and source of goods being purchased.

7. I have reviewed the data provided by SHEIN. Attached as **Exhibit 1** to this Declaration, which shows the Defendants Names, Email Addresses, Copyrights infringed, and Statutory Damages Request per Copyright infringed. 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 Defendant’s 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 Defendants.

8. In addition, defendants in multiple copyright enforcement actions in this judicial district, which includes the Defaulting Defendants, actively monitor and post information on 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 any online platform, 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 Photographs.

10. Such an award precludes the Defaulting Defendants from shielding themselves from monetary responsibility for the collective infringement of common Copyright Protected Photographs. *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 for an enhanced statutory damage award as described in **Exhibit 1** to this Declaration for their infringement of the Copyright Protected Photographs.

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

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 an active-duty member of the U.S. armed forces.

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

Executed this February 5, 2026, in Chicago, Illinois.

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

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February 2026, 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, SHEIN.

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)

Store Name	Email Address
CORSKI	truman1925@outlook.com
DYDAWN	sheinsjxabc@163.com
Fancy Boutique	yihang181@163.com

Exhibit 1

Defendants: CORSKI, DYDAWN, and Fancy Boutique

Emails: truman1925@outlook.com, sheinsjabc@163.com, yihang181@163.com

Copyrights Infringed: VA0002379888, VA0002386556, and VA0002413197

Defendants Store Name(s)	Copyright Infringed	Statutory Request Amount Per Infringement	Enhanced for Willful Infringement Request per Infringement
CORSKI	VA0002379888	\$5,000.00	\$10,000.00
DYDAWN	VA0002386556	\$5,000.00	\$10,000.00
Fancy Boutique	VA0002413197	\$5,000.00	\$10,000.00
	TOTAL:	\$15,000.00	\$30,000.00

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

HONG KONG LEYUZHEN
TECHNOLOGY CO. LIMITED,

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-14663-MFK-MV

Honorable Matthew F. Kennelly

Magistrate Maria Valdez

**DECLARATION OF LIANGJIE LI IN SUPPORT OF PLAINTIFF'S
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Liangjie Li, of Hong Kong, a special administrative region 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 Entry of Default and Default Judgment (the "Motion").

3. I am the Chief Operations Officer for Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff"). I make this declaration from matters within my own personal knowledge unless stated otherwise.

4. Plaintiff markets and sells women’s clothing and related items under the “Rotita” brand name (“Rotita”).

5. Rotita is a well-known source of women’s clothing in the United States and has been the subject of rampant competing sales using its copyrighted photographs and images through online platforms such as Temu, Tiktok, Amazon, Walmart, Alibaba, eBay, Aliexpress, and SHEIN (the “Platform”), which is the online sales platform at issue in this action. These are some of the largest online retailers in the World – and Plaintiff does not sell its products through any one of them. Rather, Plaintiff only sells its genuine Rotita brand products through its website rotita.com.

6. Plaintiff seeks an award of statutory damages against the defaulted Defendants per copyright infringing product link (the “Defaulting Defendants”) in this action. The Defaulting Defendants are accused of intentionally and willfully infringing Plaintiff’s federally registered copyright asserted in this action, VA0002379888, VA0002386556, and VA0002413197 (the “Copyright Protected Photographs”).

7. It is without question that the Defaulting Defendants have engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Photographs. In this regard, Plaintiff’s Copyright Protected Photographs, often representing recent product releases, have appeared on the Defaulting Defendant’s online stores maintained with the Shein Platform (the “Online Store”). Moreover, the Defaulting Defendants have unquestionably been operating their Online Stores using the misappropriated Copyright Protected Photographs through a sophisticated network utilizing a highly developed supply chain capable of supplying thousands of competing products featuring an array of Plaintiff’s textile patterns and designs that could not otherwise be accomplished on an individual basis.

8. 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 common scheme through sophisticated sources and established supply chains. This is the only possible scenario under which the Defaulting Defendants could procure, without authorization, Plaintiff's new copyright protected product images and offer them for sale through their Online Stores. In addition, the Defaulting Defendants have intentionally used the Copyright Protected Photographs for soliciting competing Rotita product sales on a Platform that Plaintiff does not, and has not, utilized to sell its authentic products. Simply put, these facts not only establish the Defaulting Defendant's knowledge and intentional infringement of Plaintiff's Copyright Protected Photographs.

9. Plaintiff's rough estimated gross revenue from United States sales likely exceeds \$20,000,000 USD per year. Of this amount, Plaintiff roughly estimates that over \$1,000,000 is derived from sales in the State of Illinois. Moreover, Plaintiff spends roughly anywhere from \$8,000,000 to \$12,000,000 USD each year to specifically advertise its Rotita brand in the United States through such online advertising sources as Google Ads, Facebook, and Bing. Furthermore, the company has spent more than \$80,000 in filing fees paid to the United States Copyright Office just to secure registration of copyright protected works. Plaintiff annually spends tens of millions of dollars advertising in the United States to promote the sale of its brand.

10. Plaintiff expects to earn a net profit of approximately 30% on the sale of its Rotita brand products. This figure, however, includes substantial advertising expenses that the Defaulting Defendants would not have to pay since they are largely capitalizing on Plaintiff's advertising efforts by misappropriating its copyright protected images and imbedding the term "Rotita" in their Shein Shop search engine optimization. Doing so causes their online stores to be displayed

whenever someone searches for “Rotita” on Shein despite Plaintiff not selling authentic “Rotita” brand products on the platform. Based on the foregoing, I would estimate that the Defaulting Defendant’s Online Stores operate at a net profit of between 40% to 50%. I believe that a disgorgement of the Defaulting Defendant’s profits would fall within the net profit range. However, it is impossible to definitively calculate the Defaulting Defendant’s 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.

11. The Defaulting Defendants named in Plaintiff’s copyright infringement enforcement actions is engaged in the practice of copying Plaintiff’s copyright protected product images after they are displayed on the company’s website and then associating these images with sale and promotion of competing products, thereby deceiving consumers – including the citizens of the State of Illinois. Moreover, given the nature of Plaintiff’s goods, such large-scale sales operations over multiple online retail platforms require considerable supply chain coordination that could not reasonably be accomplished independently by the named Defaulting Defendants. Simply put, Plaintiff maintains that the Defaulting Defendants are acting, pursuant to a common scheme, whereby they copy Plaintiff’s Copyright Protected Photographs, without authorization, from its website or such unauthorized images are being provided by a common source associated with manufacturing the competing products being sold on the Defaulting Defendant’s Platform storefronts.

12. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendant’s 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 consumer goodwill, 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 February 5, 2026, in Hong Kong.

By: Liangjie Li
LIANGJIE LI

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February 2026, 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 <http://blointernetenforcement.com>, and distributed to e-commerce platform, SHEIN.

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