

**IN THE UNITED STATES DISTRICT COURT
FOR THE 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,

Defendants.

Case No. 1:25-cv-15821-RWG-MV

Honorable Robert W. Gettleman

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 Defendants, The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A, and separately listed in Exhibit 1 to the accompanying Declaration of Katherine M. Kuhn (the "Kuhn Decl."). Plaintiff files herewith a Memorandum of Law in support, Declaration of Katherine M. Kuhn, and Declaration of Liangjie Li. Plaintiff's Motion for Entry of Default and Default Judgment disposes of the case.

DATED: February 13, 2026

Respectfully Submitted,

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

CERTIFICATE OF SERVICE

I hereby certify that on the 13th 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, DHGate.

By: /s/ Katherine M. Kuhn
Katherine M. Kuhn (Bar No. 6331405)

No.	Seller's Name	Contact
1	dou05	dhszc01@126.com
2	early_spring	Gin5743@163.com
3	sport8899	lgy820203@qq.com
4	keng02	dhyugou101@163.com
5	homepro14	sophiexie@babyonlinedress.cn
6	charm clothes	dhfuzhuang@126.com
7	xue03	dhbaoxue@163.com
8	Xingsha	3876175423@qq.com
9	zara05	dhjiajulei@163.com
10	clothingfa666	1181274553@qq.com
11	Fashionclothinga	d13799898844@163.com
12	Morningattire	douyinkefu1@sina.com
13	vasljh123	jinhu910@163.com
14	lian02	dhxuangui@163.com
15	Homesong	1181274553@qq.com
16	homepro12	sophiexie@babyonlinedress.cn
17	Fogosports	504086553@qq.com
18	kong003	dhshp01@126.com
19	Ddmycrazy	waysl@helphoupu.com
20	long005	dhlilidz@126.com
21	kang07	dhbang2022@163.com
22	cong00	dhszf03@126.com

No.	Seller's Name	Contact
23	long01	dhlilidz@126.com
24	outdoorsport000	wangxilun20241112@163.com
25	julia_dress	3380690673@qq.com
26	homepro19	sophiexie@babyonlinedress.cn ruisili001@163.com
27	homemarket11	sophiexie@babyonlinedress.cn
28	huafei04	dhhuafei1@163.com
29	hui09	dhjuhui@163.com
30	jichang_store1	a91634726@163.com
31	tomato_lele	a9854615@163.com
32	longda01	dhgate123321@163.com

**IN THE UNITED STATES DISTRICT COURT
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THE INDIVIDUALS, CORPORATIONS
LIMITED LIABILITY COMPANIES,
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ASSOCIATIONS IDENTIFIED IN
SCHEDULE A,

Defendants.

Case No. 1:25-cv-15821-RWG-MV

Honorable Robert W. Gettleman

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. Limited ("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 Katherine M. Kuhn (the "Kuhn Decl."). Plaintiff's Motion is made and based upon this Memorandum of Law, the Kuhn Declaration, 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 all remaining defendants.

I. INTRODUCTION

On January 13, 2026, the Court authorized electronic service via email and publication on the Defendants in connection with issuing an Order for Electronic Service and Expedited

Discovery and Temporary Restraining Order [Dkt. Nos. 20 and 21]. Plaintiff completed service on Defendants and filed a Return of Service on January 22, 2026 [Dkt. No. 27]. The deadline to respond to the Complaint was February 12, 2026.

Plaintiff seeks an award of statutory damages pursuant to 17 U.S.C. § 504(c) against the Defaulting Defendants, which Plaintiff requests to be treble enhanced for their willful infringement to of the federally registered copyrights asserted in this action; VA0002379881, VA0002379888, VA0002379893, VA0002379894, VA0002379895, VA0002379911, VA0002379930, VA0002381117, VA0002384838, VA0002386556, VA0002413555, VA0002414187, VA0002414206, VA0002414397, VA0002414404, VA0002415239, VA0002416240, VA0002416248, VA0002417127, VA0002418224, VA0002436255 (the "Copyright-Protected Photographs "). (Kuhn Decl. ¶ 5). Plaintiff additionally requests that the Court 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 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 Complaint, the Defaulting Defendants have displayed, without authorization, the Copyright-Protected Photographs on DHGate'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. (Kuhn 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 products by displaying, without authorization, Plaintiff's Copyright-Protected Photographs on their online storefronts. (Kuhn Decl. ¶¶ 8, 11-12). These circumstances clearly demonstrate 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. (*Id.*)

As of the filing of this Motion, more than twenty-two days (22) have expired since electronic service was effectuated on the Defendants, (Kuhn Decl. ¶ 4.) To date, the Defaulting Defendants have not answered or otherwise responded to Plaintiff's 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 Defendant is 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. No. 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 31, 2025, Plaintiff filed its Complaint in this action alleging Copyright Infringement (Count I). On January 13, 2026, this Court authorized electronic service through Plaintiff's Motion for same [Dkt. No. 21]. Defendants were properly served with the Complaint and all supporting documents via electronic service on January 22, 2026 [Dkt. No. 27]. Plaintiff completed service on Defendants and filed a Return of Service on January 22, 2026 [Dkt. No. 27]. The deadline to respond to the Complaint was February 12, 2026. 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) by February 12, 2026. To date, the Defaulting Defendants have not answered or otherwise responded to Plaintiff's Complaint. (Kuhn Decl. ¶ 4). Accordingly, the Clerk of the Court should be 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.

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 \$15,000.00 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). Plaintiff's requested amounts are submitted on a Defendant-by-Defendant analysis attached as **Exhibit 1** to the Kuhn Declaration.

D. Plaintiff is Entitled to the Relief Requested.

Through entry of default, Plaintiff has established that the Defaulting Defendants are liable for intentionally and willfully infringing the Copyright-Protected Photographs. As such, the only 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 Defendants' willful copyright infringement; (3) and 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 Defendants' infringement of Plaintiff's Copyright-Protected Photographs, which it maintains was done willfully and intentionally. (Kuhn Decl. ¶¶ 7, 11-12.)

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).

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 Nos. 1-1 and 2]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulting Defendants has infringed Plaintiff's Copyright-Protected Photographs [Dkt. Nos. 1-3, 2-2, 17-7 and 18]. 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 for 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. Plaintiff has established unquestionably viable copyright infringement claims in this case. The Defaulting Defendants' 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 (Kuhn 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 Defendants' gross infringing sales of their competing products or the associated deductible expenses from same. (Kuhn Decl. ¶ 7.) Plaintiff has requested \$5,000 be entered against Defendants, enhanced to \$15,000 and attached its breakdown as **Exhibit 1** to the Kuhn Declaration filed herewith. (Kuhn 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 Defendants' conduct, Plaintiff asserts that it is entitled to an award of statutory damages in the amounts requested in Exhibit 1 of the Kuhn Declaration in this action. (Kuhn Decl. ¶ 7, 12, Exhibit. 1.) First, the Defaulting Defendants was provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend. (Kuhn 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.*)

Moreover, Plaintiff has expended considerable capital in securing registration of the Copyright Protected Images 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 Defaulted Defendants.

Next, the circumstances 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 Photographs. In this regard, Plaintiff's Copyright-Protected Photographs, often representing product line releases, have appeared on the Defaulting Defendants' online store 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 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 (Kuhn Decl. ¶¶ 8, 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. As set forth in Plaintiff's supporting documentation, the Defaulting Defendants in this action should be found liable for \$5,000 for statutory damages, for each copyright infringed, which should be treble enhanced because of their willful infringements of the Copyright-Protected Photographs. (Kuhn Decl. ¶ 12, Ex. 1.) Accordingly, Plaintiff respectfully requests the Court an award of \$5,000 in statutory damages for copyright infringement under 17 U.S.C. § 504(c)(1) against Defaulting Defendants (Kuhn Decl. ¶ 12).

2. Plaintiff is entitled to enhanced statutory damages.

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

In addition, Defendants in multiple copyright enforcement actions in this judicial district, which includes the Defaulting Defendants, has been acting through their network to actively monitor and post information on the Plaintiff's pending cases on the website www.SellerDefense.cn. (Kuhn 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 bask in the security that any judgment issued against them will almost certainly not be collectable in the Republic of China. (Kuhn 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 is watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. (Kuhn Decl. ¶ 8.) The 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 treble the requested statutory damages, \$5,000 per Copyright infringed. As set forth in Plaintiff's supporting documentation Exhibit 1 to the Kuhn Declaration, the Defaulting Defendants in this action should be found liable because of their willful infringement of the Copyright-Protected Photographs. (Kuhn Decl. ¶ 12, Ex. 1) Accordingly, Plaintiff respectfully requests the Court enter an award of \$5,000.00 per Copyright infringed against Defendants for each Copyright infringed, in statutory damages, which should be enhanced for willful infringement to \$15,000.00 per Copyright infringed per Defendant, 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 Defendants'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 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 \$15,000.00 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 13, 2026

Respectfully Submitted,

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

CERTIFICATE OF SERVICE

I hereby certify that on the 13th 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, DHGate.

By: /s/ Katherine M. Kuhn
Katherine M. Kuhn (Bar No. 6331405)

No.	Seller's Name	Contact
1	dou05	dhszc01@126.com
2	early_spring	Gin5743@163.com
3	sport8899	lgy820203@qq.com
4	keng02	dhyugou101@163.com
5	homepro14	sophiexie@babyonlinedress.cn
6	charm clothes	dhfuzhuang@126.com
7	xue03	dhbaoxue@163.com
8	Xingsha	3876175423@qq.com
9	zara05	dhjiajulei@163.com
10	clothingfa666	1181274553@qq.com
11	Fashionclothinga	d13799898844@163.com
12	Morningattire	douyinkefu1@sina.com
13	vasljh123	jinhu910@163.com
14	lian02	dhxuangui@163.com
15	Homesong	1181274553@qq.com
16	homepro12	sophiexie@babyonlinedress.cn
17	Fogosports	504086553@qq.com
18	kong003	dhshp01@126.com
19	Ddmycrazy	waysl@helphoupu.com
20	long005	dhlilidz@126.com
21	kang07	dhbang2022@163.com

No.	Seller's Name	Contact
22	cong00	dhszf03@126.com
23	long01	dhlilidz@126.com
24	outdoorsport000	wangxilun20241112@163.com
25	julia_dress	3380690673@qq.com
26	homepro19	sophiexie@babyonlinedress.cn ruisili001@163.com
27	homemarket11	sophiexie@babyonlinedress.cn
28	huafei04	dhhuafei1@163.com
29	hui09	dhjuhui@163.com
30	jichang_store1	a91634726@163.com
31	tomato_lele	a9854615@163.com
32	longda01	dhgate123321@163.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE 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,

Defendants.

Case No. 1:25-cv-15821-RWG-MV

Honorable Robert W. Gettleman

Magistrate Maria Valdez

**DECLARATION OF KATHERINE M. KUHN IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Katherine M. Kuhn, 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 Entry of Default and Default Judgment against the Defendants, The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations identified in Schedule A [Dkt. No. 1-2] (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. Limited ("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 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 2026 [Dkt. No. 21], which is reflected in the Return of Summons filed in this case [Dkt. No. 27]. 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 federally registered copyrights; VA0002379881, VA0002379888, VA0002379893, VA0002379894, VA0002379895, VA0002379911, VA0002379930, VA0002381117, VA0002384838, VA0002386556, VA0002413555, VA0002414187, VA0002414206, VA0002414397, VA0002414404, VA0002415239, VA0002416240, VA0002416248, VA0002417127, VA0002418224, and VA0002436255 (the "Copyright-Protected Photographs"). As alleged in the Complaint, the Defaulting Defendants have displayed, without authorization, the Copyright-Protected Photographs on DHGate's online sales platform (the "Platform") to market and sell competing products using Plaintiff's authentic Rotita Copyright-Protected Photographs through their online stores (the "Online Stores"), thereby deceiving public consumers as to the quality, nature, and source of goods being purchased.

6. I have reviewed the data provided by DHGate, attached as **Exhibit 1** to this Declaration, email addresses, copyright number infringed on, and Statutory Damages Request. 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 Defendant.

7. 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.

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 Defendants for each alleged infringement of the Copyright-Protected Photographs.

9. 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 each Defaulting Defendant, be assessed an enhanced statutory damage award as described in **Exhibit 1** to this Declaration for their infringement of the Copyright-Protected Photographs.

10. 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.

11. The presented facts not only establish the Defaulting Defendants' 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 treble the enhancement against Defaulted Defendants based on their willful infringement of the Copyright-Protected Photographs per copyright infringed.

12. 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.

Executed this 13th day of February 2026, in Chicago, Illinois.

By: /s/ Katherine M. Kuhn
Katherine M. Kuhn

CERTIFICATE OF SERVICE

I hereby certify that on the 13th 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, DHGate.

By: /s/ Katherine M. Kuhn
Katherine M. Kuhn (Bar No. 6331405)

No.	Seller's Name	Contact
1	dou05	dhszc01@126.com
2	early_spring	Gin5743@163.com
3	sport8899	lgy820203@qq.com
4	keng02	dhyugou101@163.com
5	homepro14	sophiexie@babyonlinedress.cn
6	charm clothes	dhfuzhuang@126.com
7	xue03	dhbaoxue@163.com
8	Xingsha	3876175423@qq.com
9	zara05	dhjiajulei@163.com
10	clothingfa666	1181274553@qq.com
11	Fashionclothinga	d13799898844@163.com
12	Morningattire	douyinkefu1@sina.com
13	vasljh123	jinhu910@163.com
14	lian02	dhxuanguai@163.com
15	Homesong	1181274553@qq.com
16	homepro12	sophiexie@babyonlinedress.cn
17	Fogosports	504086553@qq.com
18	kong003	dhshp01@126.com
19	Ddmycrazy	waysl@helphoupu.com
20	long005	dhlilidz@126.com
21	kang07	dhbang2022@163.com

No.	Seller's Name	Contact
22	cong00	dhszf03@126.com
23	long01	dhlilidz@126.com
24	outdoorsport000	wangxilun20241112@163.com
25	julia_dress	3380690673@qq.com
26	homepro19	sophiexie@babyonlinedress.cn ruisili001@163.com
27	homemarket11	sophiexie@babyonlinedress.cn
28	huafei04	dhhuafei1@163.com
29	hui09	dhjuhui@163.com
30	jichang_store1	a91634726@163.com
31	tomato_lele	a9854615@163.com
32	longda01	dhgate123321@163.com

Exhibit 1

No.	Seller Store Contact	Product ID	Copyright Infringed	Statutory Damage Requested Per Copyright	Enhanced x3 for Willful Infringement Total Requested
1	dou05 21599466 dhszc01@126.com	1336914002862899200	VA0002417127	\$5,000.00	\$15,000.00
2	early_spring 22002545 Gin5743@163.com	1351099187551871102	VA0002417127	\$5,000.00	\$15,000.00
3	sport8899 22041174 lgy820203@qq.com	1370475636677128192	VA0002417127	\$5,000.00	\$15,000.00
4	keng02 21882833 dhyugou101@163.com	1336952352578842663	VA0002417127	\$5,000.00	\$15,000.00
5	homepro14 21989311 sophiexie@babyonlinedress.cn	1256307105204437014 1256313473202151438 1256332767633895436	VA0002417127 VA0002379894 VA0002414187	\$15,000.00	\$45,000.00
6	charm_clothes 22005562 dhfuzhuang@126.com	1337254358220152862 1337255522047447040 1348668078939930663	VA0002417127 VA0002416248 VA0002414187	\$15,000.00	\$45,000.00
7	xue03 21434823 dhbaoxue@163.com	1362644271399673896	VA0002416240	\$5,000.00	\$15,000.00
8	Xingsha 22026006 3876175423@qq.com	1307418254626828336	VA0002416240	\$5,000.00	\$15,000.00
9	zara05 22020504 dhjiajulei@163.com	1367685159951839275	VA0002416240	\$5,000.00	\$15,000.00
10	clothingfa666 22049530 1181274553@qq.com	1369180259459256367	VA0002414397	\$5,000.00	\$15,000.00
11	Fashionclothinga 22037755 d13799898844@163.com	1360186817914875937	VA0002436255	\$5,000.00	\$15,000.00
12	Morningattire 22034386 douyinkeful@sina.com	1357482569429815347	VA0002436255	\$5,000.00	\$15,000.00
13	vasljh123 22007031 jinhu910@163.com	1382533852040810587	VA0002436255	\$5,000.00	\$15,000.00
14	lian02 21755406 dhxuanguai@163.com	1350673160205668382 1350673442188447774 1350875673654898725	VA0002416248 VA0002415239 VA0002418224	\$15,000.00	\$45,000.00

No.	Seller Store Contact	Product ID	Copyright Infringed	Statutory Damage Requested Per Copyright	Enhanced x3 for Willful Infringement Total Requested
15	Homesong 22020512 1181274553@qq.com	1361486909107167275 1362119453501968409	VA0002416248 VA0002379888	\$10,000.00	\$30,000.00
16	homepro12 2198930818 sophiexie@babyonlinedress.cn	1256185065055887389	VA0002415239	\$5,000.00	\$15,000.00
17	Fogosports 22024327 504086553@qq.com	1341198776661270558 1369452692707614761	VA0002379930 VA0002414404	\$10,000.00	\$30,000.00
18	kong003 21614645 dhshp01@126.com	1280745966277537792 1280746037016870912	VA0002379911	\$5,000.00	\$15,000.00
19	Ddmycrazy 21989860 waysl@helphoupu.com	1254615272457007133	VA0002379911	\$5,000.00	\$15,000.00
20	long005 21569435 dhlilidz@126.com	1353779721158778912	VA0002414187	\$5,000.00	\$15,000.00
21	kang07 21836807 dhhbang2022@163.com	1351013968635088922	VA0002414187	\$5,000.00	\$15,000.00
22	cong00 21614506 dhszf03@126.com	1289435812309385252	VA0002379881	\$5,000.00	\$15,000.00
23	long01 21569542 dhlilidz@126.com	1279211435793625091	VA0002379881	\$5,000.00	\$15,000.00
24	outdoorsport000 22040040 wangxilun20241112@163.com	1379315289424060440	VA0002386556	\$5,000.00	\$15,000.00
25	julia_dress 21991069 3380690673@qq.com	1268111917761683512	VA0002386556 VA0002379893	\$10,000.00	\$30,000.00
26	homepro19 21989318 sophiexie@babyonlinedress.cn ruisili001@163.com	1291141780734742542	VA0002414206 VA0002381117	\$10,000.00	\$30,000.00
27	homemarket11 21997589 sophiexie@babyonlinedress.cn	1274966444866777090	VA0002381117	\$5,000.00	\$15,000.00
28	huafei04 21345953 dhhuafei1@163.com	1348900407173636128	VA0002379895	\$5,000.00	\$15,000.00

No.	Seller Store Contact	Product ID	Copyright Infringed	Statutory Damage Requested Per Copyright	Enhanced x3 for Willful Infringement Total Requested
29	hui09 21756554 dhjuhui@163.com	1243758572016341023	VA0002379895	\$5,000.00	\$15,000.00
30	jichang_store1 22002653 a91634726@163.com	1352439388354633770	VA0002379888	\$5,000.00	\$15,000.00
31	tomato_lele 22002541 a9854615@163.com	1344975825986134058	VA0002379888	\$5,000.00	\$15,000.00
32	longda01 21965898 dhgate123321@163.com	1340542487637532702 1350329616625004578	VA0002413555 VA0002384838	\$10,000.00	\$30,000.00
Total:				\$215,000.00	\$645,000.00