

**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-15822-RWG-JTG**

**Honorable Robert W. Gettleman**

**Magistrate Jeffrey T. Gilbert**

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

Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“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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Chicago, IL 60606  
Tel: (702) 462-5973 | Fax: (702) 553-3404  
katherine@bayramoglu-legal.com  
*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	Ideamen	97134444@qq.com
2	joe_wardrobe	3380690673@qq.com
3	bai02	dhszf01@126.com
4	Fashasha	3876175423@qq.com
5	mu03	dhszc02@126.com
6	julia_dress	3380690673@qq.com
7	Myshowtime	douyinkefu6@sina.com
8	septemberwinter	lijiasu2021@163.com
9	Eshinestore	dhfuzhuang@126.com
10	huafei06	dhuafei1@163.com
11	yujia02	dhyujiawan@163.com
12	bian02	dhyugou100@163.com
13	stylishclothes2	18950751175@163.com
14	Lastingclothing	douyinkefu2@sina.com
15	Leemostore	dhfuzhuang@126.com
16	charm_clothes	dhfuzhuang@126.com
17	chxx10	15080392429@163.com
18	tingting68	251949754@qq.com
19	keng02	dhyugou101@163.com
20	Yiwang10	yiwang9321@163.com
21	homepro12	sophiexie@babyonlinedress.cn
22	Mysticastore	dhfuzhuang@126.com

No.	Seller's Name	Contact
23	Dhshoesed	dhgate_shoe2024@163.com
24	Ddmyearth	loromelangir@helphoupu.com
25	Kuaileju	jubaopen2019@yeah.net
26	xingsha68	3876175423@qq.com

**IN THE UNITED STATES DISTRICT COURT  
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HONG KONG LEYUZHEN TECHNOLOGY  
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THE INDIVIDUALS, CORPORATIONS  
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ASSOCIATIONS IDENTIFIED IN  
SCHEDULE A,

Defendants.

**Case No. 1:25-cv-15822-RWG-JTG**

**Honorable Robert W. Gettleman**

**Magistrate Jeffrey T. Gilbert**

**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 15, 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. 24]. 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 of the federally registered copyrights asserted in this action; VA0002379881, VA0002379888, VA0002379893, VA0002379895, VA0002379911, VA0002379930, VA0002380492, VA0002381840, VA0002382273, VA0002384827, VA0002384838, VA0002384843, VA0002413181, and VA0002413196, (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 15, 2026, this Court authorized electronic service through Plaintiff's Motion for same [Dkt. No. 20]. Defendants were properly served with the Complaint and all supporting documents via electronic service on January 22, 2026 [Dkt. No. 24]. Plaintiff completed service on Defendants and filed a Return of Service on January 22, 2026 [Dkt. No. 24]. 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](http://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](http://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' 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)  
**BAYRAMOGLU LAW OFFICES LLC**  
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katherine@bayramoglu-legal.com  
joseph@bayramoglu-legal.com  
*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	Ideamen	97134444@qq.com
2	joe_wardrobe	3380690673@qq.com
3	bai02	dhszf01@126.com
4	Fashasha	3876175423@qq.com
5	mu03	dhszc02@126.com
6	julia_dress	3380690673@qq.com
7	Myshowtime	douyinkefu6@sina.com
8	septemberwinter	lijiasu2021@163.com
9	Eshinestore	dhfuzhuang@126.com
10	huafei06	dhuafei1@163.com
11	yujia02	dhyujiawan@163.com
12	bian02	dhyugou100@163.com
13	stylishclothes2	18950751175@163.com
14	Lastingclothing	douyinkefu2@sina.com
15	Leemostore	dhfuzhuang@126.com
16	charm_clothes	dhfuzhuang@126.com
17	chxx10	15080392429@163.com
18	tingting68	251949754@qq.com
19	keng02	dhyugou101@163.com
20	Yiwang10	yiwang9321@163.com
21	homepro12	sophiexie@babyonlinedress.cn

No.	Seller's Name	Contact
22	Mysticastore	dhfuzhuang@126.com
23	Dhshoesed	dhgate_shoe2024@163.com
24	Ddmyearth	loromelangir@helphoupu.com
25	Kuaileju	jubaopen2019@yeah.net
26	xingsha68	3876175423@qq.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-15822-RWG-JTG**

**Honorable Robert W. Gettleman**

**Magistrate Jeffrey T. Gilbert**

**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. Nos. 1-2 and 2-1] (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 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 15, 2026 [Dkt. No. 20], 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 federally registered copyrights; VA0002379881, VA0002379888, VA0002379893, VA0002379895, VA0002379911, VA0002379930, VA0002380492, VA0002381840, VA0002382273, VA0002384827, VA0002384838, VA0002384843, VA0002413181, and VA0002413196 (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 brand Copyrighted photos through their online store (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 Defendants' intentional decision not to appear and defend this action, Plaintiff has been deprived of a

meaningful opportunity to assess the true nature of its actual damages. This uncertainty supports Plaintiff's requested statutory damages against the Defaulting Defendants.

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](http://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. Each Defaulting Defendant fails to list a physical address where Plaintiff could attempt traditional means of service. Although no physical address for each store was located, based on the email addresses, and through our investigation Plaintiff has 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 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

<b>No.</b>	<b>Seller's Name</b>	<b>Contact</b>
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

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited  
Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

**26 Defaulting Defendants 1:25-cv-15822**

<b>No.</b>	<b>Seller Store Contact</b>	<b>Product ID</b>	<b>Copyright Infringed</b>	<b>Statutory Damage Requested Per Copyright</b>	<b>Enhanced x3 for Willful Infringement Total Requested</b>
<b>1</b>	Ideamen 21887774 97134444@qq.com	1383928076922560533	VA0002379881	\$5,000.00	<b>\$15,000.00</b>
<b>2</b>	joe_wardrobe 22010224 3380690673@qq.com	1398833826269663255	VA0002379881	\$5,000.00	<b>\$15,000.00</b>
<b>3</b>	bai02 21599667 dhszf01@126.com	1093089199232376886	VA0002379881	\$5,000.00	<b>\$15,000.00</b>
<b>4</b>	Fashasha 22022129 3876175423@qq.com	1307115491410149427 1307133674778390573	VA0002379881	\$5,000.00	<b>\$15,000.00</b>
<b>5</b>	mu03 21599639 dhszc02@126.com	829891621436719131 1383735338356559872	VA0002379881 VA0002381840	\$10,000.00	<b>\$30,000.00</b>
<b>6</b>	julia_dress 21991069 3380690673@qq.com	1263032824389558318	VA0002379888	\$5,000.00	<b>\$15,000.00</b>
<b>7</b>	Myshowtime 22034424 douyinkefu6@sina.com	1322277757351378953	VA0002380492	\$5,000.00	<b>\$15,000.00</b>
<b>8</b>	septemberwinter 22028842 lijiasu2021@163.com	1317623594129199157	VA0002380492	\$5,000.00	<b>\$15,000.00</b>
<b>9</b>	Eshinestore 22005550 dhfuzhuang@126.com	1284560779768041514	VA0002384827	\$5,000.00	<b>\$15,000.00</b>
<b>10</b>	huafei06 21345959 dhhuafei1@163.com	1325394271150219302	VA0002380492	\$5,000.00	<b>\$15,000.00</b>
<b>11</b>	yujia02 21751570 dhyujiawan@163.com	1310131084859359232	VA0002380492	\$5,000.00	<b>\$15,000.00</b>
<b>12</b>	bian02 21859857 dhyugou100@163.com	1259324596814008378	VA0002379895	\$5,000.00	<b>\$15,000.00</b>
<b>13</b>	stylishclothes2 22227496 18950751175@163.com	1396307864474656777	VA0002379893	\$5,000.00	<b>\$15,000.00</b>
<b>14</b>	Lastingclothing 22034388 douyinkefu2@sina.com	1329165810970796076 1329166339293614113	VA0002379911 VA0002379881	\$10,000.00	<b>\$30,000.00</b>

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited  
Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

**26 Defaulting Defendants 1:25-cv-15822**

No.	Seller Store Contact	Product ID	Copyright Infringed	Statutory Damage Requested Per Copyright	Enhanced x3 for Willful Infringement Total Requested
15	Leemostore 22005567 dhfuzhuang@126.com	1325105583750365238 1377210933674610730 1325105553807933470	VA0002384827 VA0002413181 VA0002413196	\$15,000.00	\$45,000.00
16	charm_clothes 22005562 dhfuzhuang@126.com	1287704778016444446	VA0002379893	\$5,000.00	\$15,000.00
17	chxx10 22150980 15080392429@163.com	1390117691385638962	VA0002382273	\$5,000.00	\$15,000.00
18	tingting68 22242989 251949754@qq.com	1400493067852890169	VA0002379888	\$5,000.00	\$15,000.00
19	keng02 21882833 dhyugou101@163.com	1304667465420836900	VA0002379895	\$5,000.00	\$15,000.00
20	Yiwang10 21269296 yiwang9321@163.com	1345161156287455291	VA0002379895	\$5,000.00	\$15,000.00
21	homepro12 21989308 sophiexie@babyonlinedress.cn	1256205815289229339	VA0002379895	\$5,000.00	\$15,000.00
22	Mysticastore 22005569 dhfuzhuang@126.com	1362764606335594556	VA0002379895	\$5,000.00	\$15,000.00
23	Dhshoesed 22016160 dhgate_shoe2024@163.com	1408983329561698424	VA0002413181	\$5,000.00	\$15,000.00
24	Ddmyearth 21997662 loromelangir@helphoupu.com	1267370843353137188	VA0002384838	\$5,000.00	\$15,000.00
25	Kuaileju 21404393 jubaopen2019@yeah.net	659832267081871537	VA0002384843	\$5,000.00	\$15,000.00
26	xingsha68 22026008 3876175423@qq.com	1359585156672061504	VA0002379930	\$5,000.00	\$15,000.00
<b>Total:</b>				\$150,000.00	\$450,000.00

**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-15822-RWG-JTG**

**Honorable Robert W. Gettleman**

**Magistrate Jeffrey T. Gilbert**

**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 Default and Default Judgment (the "Motion").

3. I am the Chief Operations Officer for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my 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 images through online platforms such as Tiktok, Amazon, Walmart, Temu, eBay, AliExpress, Alibaba, DHGate (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 following federally registered copyright asserted in this action: VA0002379881, VA0002379888, VA0002379893, VA0002379895, VA0002379911, VA0002379930, VA0002380492, VA0002381840, VA0002382273, VA0002384827, VA0002384838, VA0002384843, VA0002413181, and VA0002413196, (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 Defendants’ online store maintained with the DHGate Platform (the “Online Store”). Moreover, the Defaulting Defendants have unquestionably been operating their Online Store 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 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 Defendants' 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 DHGate search engine optimization. Doing so causes their online stores to be displayed whenever

someone searches for "Rotita" on DHGate despite Plaintiff not selling authentic "Rotita" brand products on the platform. Based on the foregoing, I would estimate that the Defaulting Defendants' Online Stores operate at a net profit of between 40% to 50%. I believe that a disgorgement of the Defaulting Defendants' profits would fall within the net profit range. However, it is impossible to definitively calculate the Defaulting Defendants' total sales on the Platform through their Online Stores or to ascertain their expenses related to their infringing sales because they have failed to appear, defend, or otherwise participate in this action.

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 the 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 Defendants' Platform storefronts.

12. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendants' unauthorized use of its federally registered Copyright-Protected Photographs asserted in this action. This results in the direct harm to Plaintiff's brand reputation

and loss of 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 13, 2026, in Hong Kong.

By: /s/ Liangjie Li  
LIANGJIE LI

**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	Ideamen	97134444@qq.com
2	joe_wardrobe	3380690673@qq.com
3	bai02	dhszf01@126.com
4	Fashasha	3876175423@qq.com
5	mu03	dhszc02@126.com
6	julia_dress	3380690673@qq.com
7	Myshowtime	douyinkefu6@sina.com
8	septemberwinter	lijiasu2021@163.com
9	Eshinestore	dhfuzhuang@126.com
10	huafei06	dhuafei1@163.com
11	yujia02	dhyujiawan@163.com
12	bian02	dhyugou100@163.com
13	stylishclothes2	18950751175@163.com
14	Lastingclothing	douyinkefu2@sina.com
15	Leemostore	dhfuzhuang@126.com
16	charm_clothes	dhfuzhuang@126.com
17	chxx10	15080392429@163.com
18	tingting68	251949754@qq.com
19	keng02	dhyugou101@163.com
20	Yiwang10	yiwang9321@163.com
21	homepro12	sophiexie@babyonlinedress.cn

No.	Seller's Name	Contact
22	Mysticastore	dhfuzhuang@126.com
23	Dhshoesed	dhgate_shoe2024@163.com
24	Ddmyearth	loromelangir@helphoupu.com
25	Kuaileju	jubaopen2019@yeah.net
26	xingsha68	3876175423@qq.com