

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

**Case No.: 1:25-cv-26100-BLOOM/Elfenbein**

HONG KONG YU'EN E-COMMERCE CO.  
LIMITED,

Plaintiff,

v.

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

Defendants.

**PLAINTIFF'S MOTION FOR ENTRY OF CLERK'S DEFAULT  
AGAINST CERTAIN DEFENDANTS**

Plaintiff Hong Kong Yu'En E-Commerce Co. Limited ("Plaintiff"), hereby moves for Entry of Clerk's Default against certain Defendants identified in Schedule "A" to the complaint (collectively, the "Defaulting Defendants"). Dkt. Nos. 1-1, 11-1. The Defaulting Defendants have been separately listed in Exhibit 1 to the accompanying Declaration of Willam Brees (the "Brees Decl."). Plaintiff makes this motion on the ground that the Defaulting Defendants have failed to appear or otherwise respond to the Complaint within the time prescribed by Federal Rules of Civil Procedure.

On January 8, 2026, the Court authorized electronic service via email on Defendants listed in Schedule "A" in connection with the Temporary Restraining Order ("TRO"). Dkt. Nos. 10, 12. On January 26, 2026, Defendants were served with their respective Summons and copies of the Complaint and Temporary Restraining Order via electronic mail ("e-mail") to the email addresses

provided by the online marketplace Amazon.com response to request for expedited discovery as permitted by the TRO and via website posting pursuant to the Court's Order authorizing alternate service of process. Brees Decl. ¶ 3; see Dkt. No. 17 Return of Service on file with the Court. The deadline to respond to the Complaint and Jury Demand (the "Complaint") [Dkt. No.1] was February 16, 2026. Brees Decl. ¶ 4. Defendant No. 5 filed a responsive pleading on February 5, 2026. Dkt. No. 23.

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. As of the filing of this Motion, approximately twenty-four (24) days have expired since electronic service was effectuated on the Schedule "A" Defendants, which includes the Defaulting Defendants that are the subject of Plaintiff's Motion. *Id.* at ¶ 10. To date, none of the Defaulting Defendants have answered or otherwise responded to Plaintiff's Complaint. *Id.* at ¶ 11.

WHEREFORE, Plaintiff request that default be entered against the Defaulting Defendants, Schedule "A" Nos. 1-4 and 6.

DATED: February 19, 2026

Respectfully submitted,

/s/ William R. Brees

William R. Brees (FL Bar No. 98886)

william@bayramoglu-legal.com

**BAYRAMOGLU LAW OFFICES LLC**

1540 W. Warm Springs Rd., Ste 100

Henderson, NV 89014

Tel: (702) 462 – 5973

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 19th day of February 2026, I electronically filed the foregoing using the electronic case filing system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party, Amazon.

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

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SCHEDULE "A" HERETO,

Defendants.

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

I, William R. Brees, Esq., of St. Petersburg, Florida, declare as follows:

1. I am an attorney duly licensed to practice before this Court, and I am counsel for Plaintiff, Hong Kong Yu'En E-Commerce Co. Limited ("Plaintiff") in the above-captioned matter. I make this Declaration, which is filed in support of Plaintiff's Motion for Entry of Clerk's Default Against Certain Defendants, and I could and would testify competently to the matters set forth herein.

2. On December 26, 2025, Plaintiff filed its Complaint and Jury Demand [Dkt. No. 1] against Defendants, the Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations identified on Schedule "A" [Dkt. No. 1-1, 11-1] (collectively, "Defendants").

3. On January 26, 2026, Defendants were served with their respective Summons and copies of the Complaint and Temporary Restraining Order via electronic mail (“e-mail”) and via website posting pursuant to the Court’s Order authorizing alternate service of process. See Dkt. Nos. 10, 17 (Return of Service on file with the Court.)

4. The deadline to respond to the Complaint and Jury Demand (the “Complaint”) [Dkt. No.1] was February 16, 2026.

5. Defendant No. 5 filed a responsive pleading on February 5, 2026. [Dkt. No. 23].

6. The remaining Defendants to whom the Motion for Entry of Clerk’s Default applies are Defendant Nos. 1-4 and 6 (collectively the “Defaulting Defendants”).

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

8. As of the filing of this Motion, approximately twenty-three days (23) have expired since electronic service was effectuated on the Schedule "A" Defendants.

9. The Defaulting Defendants have failed to answer or otherwise respond to the Complaint or serve a copy of the Answer or other response upon Plaintiff’s attorneys of record. A list of the Defaulting Defendants is attached hereto as **Exhibit 1**.

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

Executed on February 19, 2026, in St. Petersburg, Florida.

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

# EXHIBIT 1

**DEFAULTING DEFENDANTS**

<b>Defendant No.</b>	<b>Seller's Name</b>	<b>SELLER EMAIL'S</b>
1	CA-YI 7-14 Days Delivery	yizizi87@163.com
2	Mumingsm	caiyuangglai@126.com
3	haonuokang kl	haonuokangly@163.com
4	OSFVNOXV lightning deal	lisiljiaon@yeah.net
6	Forerruti (Deals of The Day Clearance)	huocuocuo2345@163.com

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Defendants.

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

Before the Court is Plaintiff Hong Kong Yu'En E-Commerce Co. Limited's motion for entry of clerk's default against certain defendants pursuant to Federal Rule of Civil Procedure 55(a) (the "Motion") against certain non-appearing, through the filing of an answer or otherwise responsive pleading, Schedule "A" Defendants (the "Defaulting Defendants"). A true and correct listing of the Defaulting Defendants is included in this Order.

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

**IT IS SO ORDERED.**

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

\_\_\_\_\_  
HONORABLE BETH BLOOM  
UNITED STATES DISTRICT COURT JUDGE

**DEFAULTING DEFENDANTS**

<b>Defendant No.</b>	<b>Seller's Name</b>	<b>SELLER EMAIL'S</b>
1	CA-YI 7-14 Days Delivery	yizizi87@163.com
2	Mumingsm	caiyuangglai@126.com
3	haonuokang kl	haonuokangly@163.com
4	OSFVNOXV lightning deal	lisiljiaon@yeah.net
6	Forerruti (Deals of The Day Clearance)	huocuocuo2345@163.com