

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

HONG KONG LEYUZHEN TECHNOLOGY CO.  
LIMITED,

Plaintiff,

v.

JiaRui Fashion,

Defendant.

**Case No. 1:25-cv-15482-MMP-LKM**

**Honorable Martha M. Pacold**

**Magistrate Judge Laura K. McNally**

**PLAINTIFF’S MOTION FOR ENTRY OF CLERK’S DEFAULT AGAINST  
DEFENDANT**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“Plaintiff”) hereby moves for entry of clerk’s default pursuant to Federal Rule of Civil Procedure 55(a) (the “Motion”) against Defendant, JiaRui Fashion, for not appearing, through the filing of an answer or otherwise responsive pleading, (the “Defaulting Defendant”).

DATED: March 19, 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 19th day of March 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 <https://blointernetenforcement.com/>, and distributed to ecommerce platform, Temu.

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**PLAINTIFF’S MEMORANDUM IN SUPPORT OF MOTION FOR ENTRY OF  
DEFAULT AGAINST DEFENDANT**

Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“Plaintiff”) submits the following memorandum in support of its request for entry of default (the “Motion”) pursuant to Federal Rule of Civil Procedure 55(a) (“Rule 55(a)”) against Defendant, JiaRui Fashion, through not filing of an answer or otherwise responsive pleading, (the “Defaulting Defendant”).

**I. INTRODUCTION**

Plaintiff’s request for entry of default is straightforward, the Court authorized electronic service of process on Defendant via email in this matter on February 19, 2026. [22] Plaintiff effectuated service on Defendant and a Return of Service was filed on February 24, 2026. [23].

Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A) (“Rule 12(a)(1)(A)”), the Defaulting Defendant had twenty-one (21) days to answer or otherwise respond to Plaintiff’s Complaint in this action. As of the filing of this Motion, more than twenty-one (21) days have expired since electronic service was effectuated on Defendant. (Kuhn Decl. ¶ 5). To date, the Defaulting Defendant has neither answered or otherwise responded to Plaintiff’s Complaint. (*Id.*).

Accordingly, the Clerk of the Court is compelled to enter default pursuant to Rule 55(a) against the Defaulting Defendant.

## **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 [12]. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendant since the Defendant directly targets business activities toward consumers in Illinois and causes harm to Plaintiff’s business within this judicial district [Id. at ¶ 2]; *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).

### **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 First Amended Complaint in this action [12]. The Defendant was properly served on February 24, 2026 [23]. As such, the Defaulting Defendant had twenty-one (21) days to answer or otherwise respond to Plaintiff’s complaint pursuant to Rule 12(a)(1)(A). As of the filing of this Motion, more than twenty-one (21) days

have expired since electronic service was effectuated. (Kuhn Decl. ¶ 5). To date, Defaulting Defendant has neither answered or otherwise responded to Plaintiff's Complaint. (*Id.*). Accordingly, the Clerk of the Court is compelled to enter default pursuant to Rule 55(a) against the Defaulting Defendant.

### III. CONCLUSION

Based on the foregoing, Plaintiff respectfully requests that the Clerk of the Court enter default against the Defaulting Defendant pursuant to Rule 55(a).

DATED: March 19, 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*

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**DECLARATION OF KATHERINE M. KUHN IN SUPPORT OF PLAINTIFF'S  
MOTION FOR ENTRY OF DEFAULT AGAINST DEFENDANT**

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 Clerk's Default against Defendant, JiaRui Fashion, (the "Motion"). The Motion seeks entry of default against Defendant who has neither appeared in this action nor filed an answer or otherwise responsive pleading (the "Defaulting Defendant").

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 matters within my own knowledge unless stated otherwise.

4. I hereby certify that the Defaulting Defendant has failed to file an answer or other responsive pleading within twenty-one (21) days after being served with the Summons and Complaint in this action as required by Federal Rule of Civil Procedure 12(a)(1)(A).

5. Specifically, Defendant was served with copies of the Summons and Complaint via electronic service authorized by the Court on February 24, 2026, which is reflected in the Return of Summons filed in this case [23]. As of the filing of this Motion, more than twenty-one (21) days have expired since electronic service was effectuated on the Defendant.

6. My office investigated the infringing activities of the Defaulting Defendant, including attempting to identify their contact information. Our investigation confirmed that the Defaulting Defendant is domiciled in Asia and, more particularly, in either the People's Republic of China or territory under that government's control. As such, I am informed and believe that the Defaulting Defendant is active-duty member of any branch of the United States armed services.

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

Executed on March 19, 2026, in Chicago, Illinois.

By: /s/ Katherine M. Kuhn  
KATHERINE M. KUHN, ESQ.

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