

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

WUMEI LIN,

Plaintiff,

v.

DAFFODILY,

Defendant.

Case No. 1:25-cv-15686-MMP-JTG

Honorable Martha M. Pacold

Magistrate Jeffrey T. Gilbert

**PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT
AGAINST DEFENDANT**

Plaintiff WUMEI LIN ("Plaintiff") hereby moves for entry of Default Judgment against Defendant, DAFFODILY, as identified in Exhibit 2 to the First Amended Complaint [Dkt. 14-2] and separately listed in Exhibit "1" to the accompanying Declaration of Joseph W. Droter (the "Droter Decl."). Plaintiff files herewith a Memorandum of Law, the Droter Decl., and the Declaration of Wumei Lin in support. Plaintiff's Motion for entry of Default Judgment disposes of the case.

DATED: May 11, 2026

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

BAYRAMOGLU LAW OFFICES, LLC

233 S. Wacker Drive, 44th Floor, #57

Chicago IL 60606

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Joseph@bayramoglu-legal.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May 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. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been 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, TikTok.

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

Defendant Name	Email Address
DAFFODILY	yaolikeji@163.com

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

WUMEI LIN,

Plaintiff,

v.

DAFFODILY,

Defendant.

Case No. 1:25-cv-15686-MMP-JTG

Honorable Martha M. Pacold

Magistrate Jeffrey T. Gilbert

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

Plaintiff Wumei Lin (“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 Defendant, DAFFODILY (“Defendant” or “Defaulting Defendant”), which has been separately listed in Exhibit “1” to the accompanying Declaration of Joseph W. Droter (the “Droter Decl.”). Plaintiff’s Motion is made and based upon this Memorandum of Law, the Droter Declaration, the Declaration of Wumei Lin (the “Lin Decl.”), the papers and pleadings on file in this action, and any argument of counsel the Court may entertain. Plaintiff’s Motion for entry of Default and Default Judgment disposes of the case.

I. INTRODUCTION

On March 27, 2026, the Court authorized electronic service on Defendant. [Dkt. 29]. Plaintiff effectuated service on March 27, 2026, by transmitting the Summons and First Amended Complaint to Defendant via email and by publishing a link to the First Amended Complaint, Summons, this Order, and related filings on a dedicated website, with identical materials attached

to emails sent to all known email addresses associated with Defendant as identified by third parties. [Dkt. 30]. Defendant's deadline to respond to the Complaint was April 17, 2026.

Plaintiff seeks an award of \$5,000 statutory damages pursuant to 17 U.S.C. § 504(c) against the Defaulting Defendant, which Plaintiff requests to be enhanced to \$15,000 for their willful infringement to of the following federally registered copyright asserted in this action: VA0002441336 (the "Copyright Protected Image"). Plaintiff additionally requests the Court to issue a permanent injunction against the Defaulting Defendant. *See* 17 U.S.C. § 502(a).

II. FACTUAL BACKGROUND

As alleged in the First Amended Complaint, the Defaulting Defendant has publicly displayed unlicensed and unauthorized reproduction of Plaintiff's Copyright Protected Image on the TikTok online sales platform (the "Platform") to market and sell competing products using Plaintiff's Copyright Protected Image, thereby deceiving public consumers as to the quality, nature, and source of goods being purchased. (Droter Decl. ¶ 6). As of the filing of this Motion, more than twenty-one days (21) have expired since electronic service was effectuated on the Defendant, (Droter Decl. ¶ 4). To date, the Defaulting Defendant has not answered or otherwise responded to Plaintiff's First Amended Complaint. (*Id.*). Therefore, the Court entered Default pursuant to FRCP 55(a) against Defaulting Defendant. [Dkt. 37].

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). Here, Defaulting Defendant has willfully and intentionally infringed Plaintiff's Copyright Protected Image, supporting the Plaintiff's request for enhanced statutory damages. Plaintiff meets the requirements for entry of the requested default judgment under Rule 55(b)(2).

IV. 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. 14]. 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.]; *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. In the case at bar, it is unquestionable that the Defaulting Defendant is subject to personal jurisdiction in this action.

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

A default judgment establishes, as a matter of law, that the named, unresponsive Defendant is 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 Defendant is 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. Here, more than twenty-one (21) days have passed since Defendant was served, and no answer or other responsive pleading has been filed by the Defaulting Defendant. *See* Fed. R. Civ. P. 12(a)(1)(A). Therefore, an entry of a default judgment is appropriate.

Moreover, Plaintiff is entitled to the following remedies through the issuance of a default judgment against the Defaulting Defendant: (1) an award of \$5,000 in statutory damages against

the Defendant for copyright infringement under 17 U.S.C. § 504(c)(1); (2) an award of enhanced \$15,000 in statutory damages against the Defaulting Defendant 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).

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

Plaintiff is entitled to such relief for the Defaulting Defendant's infringement of the company's Copyright Protected Image, which it maintains was done willfully and intentionally. (Lin Decl. ¶ 5). 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). In this case, Plaintiff has asserted a viable claim for infringement of its Copyright Protected Image. 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 Image in its First Amended Complaint [Dkt. 14], and has supplied the Court with a summary of all registrations issued by the United

States Copyright Office [Dkt. 14-1]. Moreover, Plaintiff has set forth considerable factual allegations establishing the Defaulting Defendant has infringed the Copyright Protected Image. [Dkt. 14-2]. Therefore, the Defaulting Defendant has infringed the company's Copyright Protected Image.

Next, Plaintiff is entitled to an award of statutory damages given the circumstances in this action. An award of statutory damages is appropriate because actual damages "are often virtually impossible to prove . . ." *White*, 771 F.Supp.2d at 956. In awarding statutory damages, the court is not required to follow any rigid formula. *Id.* (citing *Chi-Boy Music v. Charlie Club, Inc.*, 930 F.2d 1224, 1229 (7th Cir. 1991)). Instead, the court enjoys wide discretion in setting a statutory damage award within the prescribed range from \$750 to \$30,000 per infringement. *Broadcast Music, Inc. v. Star Amusements, Inc.*, 44 F.3d 485, 489 (7th Cir. 1995). The court may consider such factors as the difficulty or impossibility of proving actual damages, the circumstances of the infringement, and the efficacy of the damages as a deterrent to future copyright infringement. *Chi-Boy Music*, 930 F.2d at 1229. Here, Plaintiff has established unquestionably a viable copyright infringement claim in this case. Additionally, the Defaulting Defendant's 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. (Lin Decl. ¶ 9).

Specifically, Plaintiff has neither obtained, nor is the Defaulting Defendant participating in these proceedings, so that the Court can be provided with the infringer's deductible expenses related to the sale of the competing products associated with the unauthorized use and public display of Plaintiff's Copyright Protected Image. *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 using Plaintiff's copyright or the associated deductible expenses from same.

(Droter Decl. ¶ 7). Moreover, Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendant's unauthorized use of its federally registered copyright protected image asserted in this action. (Lin Decl. ¶ 11). This results in the direct harm to Plaintiff's brand reputation and loss of exclusive licenses, both of which are harms that are virtually impossible to ascertain the resulting economic loss. (*Id.*). Therefore, an award of statutory damages is appropriate because actual damages are virtually impossible to prove in this case. *See White*, 771 F.Supp.2d at 956. Given the foregoing circumstances, and the nature of the Defaulting Defendant's conduct, Plaintiff asserts that it is entitled to an award of \$5,000 in statutory damages against the Defaulting Defendant and submits an analysis showing the Defaulting Defendant, the copyright infringed, value of the Copyrighted Image, and the enhanced statutory damages requested. (Droter Decl. ¶ 11, Exhibit. 1).

In this case, the Defaulting Defendant was provided with notice of these proceedings and, apparently, intentionally elected not to appear and defend. (Droter Decl. ¶ 7). As a result of the Defaulting Defendant's intentional decision not to appear and defend this action, Plaintiff has been deprived of a meaningful opportunity to assess the true nature of its actual damages. (*Id.*). The Defaulting Defendant has intentionally used the Copyright Protected Image for soliciting their competing product sales without obtaining a license and have never been authorized to use the Copyright Protected Image. (Lin Decl. ¶ 8). It is impossible to definitively calculate the Defaulting Defendant's total sales on the Platform through their Online Store or to ascertain their expenses related to their infringing sales because they have failed to appear, defend, or otherwise participate in this action. (*Id.* ¶ 9). These facts unquestionably support Plaintiff's requested statutory damages of the infringed Copyright Protected Image against the Defaulted Defendant.

The actions of the Defaulting Defendant's infringement clearly support awarding the requested statutory damage award against them. It is without question that the Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Image. In this regard, Plaintiff's Copyright Protected Image, without a license, has appeared on the Defaulting Defendant's online store maintained with the Platform. (Lin Decl. ¶ 6). These actions by the Defendant, justify an award of statutory damages. Plaintiff respectfully requests the Court award statutory damages for copyright infringement under 17 U.S.C. § 504(c)(1) in an amount not less than \$5,000.00 against the Defaulting Defendant. (Droter Decl. ¶ 12, Ex. 1).

2. Plaintiff is entitled to enhanced statutory damages.

1. Here, the Defaulting Defendant's infringement clearly supports awarding an enhanced statutory damage award against them. The Defaulting Defendant's infringing conduct in this action is willful and continue to infringe even after notice of the lawsuit, thereby justifying enhanced damages under 17 U.S.C. § 504(c)(2). Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Image. (Droter Decl. ¶ 5, 12). Plaintiff's Copyright Protected Image, without obtaining a license, has appeared on the Defaulting Defendant's online store maintained with the Platform. (Lin Decl. ¶ 6). The Defaulting Defendant has clearly been operating their online store using the unauthorized and unlicensed Copyright Protected Image. In addition, defendants in multiple copyright enforcement actions in this judicial district, have been acting through their network to actively monitor and post information on Plaintiff's pending cases on the website www.SellerDefense.cn. (Droter Decl. ¶ 8). This has apparently been done to advise defendants in all pending actions of Plaintiff, and the viability of appearing and asserting potential defenses. (*Id.*). 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 Defendant on the grounds that they should serve as a deterrent to future conduct. *Id.* at 1229-30.

Here, the Defaulting Defendant is watching the results of Plaintiff's copyright infringement enforcement actions in this judicial district. 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 Defendant for the infringement of the Copyright Protected Image. (Droter Decl. ¶ 10). The Defaulting Defendant has simply taken the apparent position that any recovery issued by a court is not executable against their assets on the named online platform in the U.S. This conduct demonstrates an intentional willingness to ignore the Court's authority to impose significant statutory damages in this action to send a message to the Defaulting Defendant, and all other similar infringers, that they will incur substantial liability for their actions. In doing so, hopefully the Defaulting Defendant, or other similar infringers monitoring this case, will post this anticipated award on the www.SellerDefense.cn website as notice of the consequences for their willful actions.

Here, Plaintiff respectfully requests the Court enter an award of \$5,000 statutory damages against the Defaulted Defendant, which should be enhanced to \$15,000 for willful infringement of the Copyright Protected Image, pursuant to 17 U.S.C. § 504(c)(2). The Defendant request analysis is provided as Exhibit 1 to the Droter Declaration. (Droter Decl. ¶ 12, Exhibit. 1).

3. Plaintiff is entitled to a permanent injunction.

Next, Plaintiff is entitled to the entry of a permanent injunction against the Defaulting Defendant pursuant to 17 U.S.C. § 502(a), which authorizes courts to “grant temporary and final

injunctions on such terms as it may deem reasonable to prevent or restrain infringement of a copyright.”

In determining whether permanent injunctive relief is appropriate, courts apply the four-factor test set forth in *eBay Inc. v. MercExchange, L.L.C.*, 547 U.S. 388, 391 (2006), requiring a showing that: (1) Plaintiff has suffered an irreparable injury; (2) remedies available at law are inadequate to compensate for that injury; (3) the balance of hardships favors injunctive relief; and (4) the public interest would not be disserved by a permanent injunction. Each factor weighs decisively in favor of granting injunctive relief here.

First, Plaintiff has suffered and will continue to suffer irreparable harm absent injunctive relief. 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 alleged, and has offered proof, that the Defaulting Defendant has engaged in the infringement of the Copyright Protected Image, the Defaulting Defendant has reproduced and publicly displayed Plaintiff’s Copyright Protected Image without authorization in connection with their online product listing. (Droter Decl. ¶ 12). Such conduct causes loss of control over Plaintiff’s copyrighted works, damage to brand goodwill, and consumer confusion; harms that are inherently difficult to quantify and not fully compensable through monetary damages alone. Moreover, the Defaulting Defendant’s failure to appear or participate in this action demonstrates a substantial risk of continued infringement absent court-ordered relief.

Second, legal remedies are inadequate. 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. *See Virgin Records Am. Inc. v. Johnson*, where the court granted a permanent injunction under § 502(a) due to the defendant's failure to respond and the likelihood of continued infringement, emphasizing the public interest in upholding copyright protections. 441 F. Supp. 2d 963. Because the Defaulting Defendant has elected not to appear, Plaintiff lacks any meaningful ability to monitor, deter, or prevent future infringement through monetary relief alone. Courts routinely recognize that where defendants operate anonymous or foreign-based online storefronts, monetary damages are insufficient to prevent continued unlawful conduct.

Third, the balance of hardships strongly favors Plaintiff. Plaintiff seeks only to prohibit the Defaulting Defendant from engaging in unlawful conduct, namely the unauthorized use and display of Plaintiff's Copyrighted Image. The Defaulting Defendant has no legitimate interest in continuing infringing activities and therefore will suffer no cognizable hardship from compliance with a permanent injunction.

Finally, public interest is served by the enforcement of federal copyright laws and the prevention of consumer deception. Granting injunctive relief promotes respect for intellectual property rights and discourages future infringement, particularly in the online marketplace context.

Because the Defaulting Defendant has failed to respond, defend, or otherwise participate in this action, and because the record establishes a strong likelihood of continued infringement absent injunctive relief, entry of a permanent injunction is appropriate and warranted under 17 U.S.C. § 502(a). Accordingly, Plaintiff respectfully requests that the Court enter a permanent injunction

prohibiting the Defaulting Defendant, and all persons acting in concert with it, from directly or indirectly infringing Plaintiff's copyrighted image.

CONCLUSION

Under Rule 55(b)(2), Plaintiff respectfully requests this Court for entry of a default judgment finding the Defaulting Defendant liable on all counts asserted in Plaintiff's First Amended Complaint. [Dkt. 14]. These asserted counts include claims for Copyright Infringement (Count I) [Dkt. 12 at 36-51]. In granting its request, Plaintiff asks the Court to award the following: (1) \$5,000 in statutory damages against Defaulting Defendant pursuant to 17 U.S.C. § 504(c)(1); (2) enhanced statutory damages of \$15,000 against the Defaulting Defendant based on their willful infringement pursuant to 17 U.S.C. § 504(c)(2); (3) issuance of a permanent injunction against the Defaulting Defendant pursuant to 17 U.S.C. § 502(a); and (4) such other relief as the Court deems just and proper.

DATED: May 11, 2026

Respectfully submitted,

By: /s/ Joseph W. Droter

Joseph W. Droter (Bar No. 6329630)

BAYRAMOGLU LAW OFFICES, LLC

233 S. Wacker Drive, 44th Floor, #57

Chicago, IL 60606

Tel: (702) 462-5973 | Fax: (702) 553-3404

Joseph@bayramoglu-legal.com

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May 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.

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES, LLC
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Joseph@bayramoglu-legal.com
Attorney for Plaintiff

Defendant Name	Email Address
DAFFODILY	yaolikeji@163.com

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
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WUMEI LIN,

Plaintiff,

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DAFFODILY,

Defendant.

Case No. 1:25-cv-15686-MMP-JTG

Honorable Martha M. Pacold

Magistrate Jeffrey T. Gilbert

**DECLARATION OF JOSEPH W. DROTER IN SUPPORT OF
MOTION FOR ENTRY OF DEFAULT JUDGMENT**

I, Joseph W. Droter, of the City of Chicago, in the State of Illinois, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Motion for Default and Default Judgment (the "Motion") against the Defendant, Daffodily, (the "Defaulting Defendant" and "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 Wumei Lin ("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 plead or otherwise defend this action within twenty-one (21) days after being served with the Summons and First Amended Complaint in this action in violation of Federal Rule of Civil Procedure 12(a)(1)(A).

Specifically, Defendant was served with copies of the Summons and First Amended Complaint via electronic service authorized by the Court on March 27, 2026, which is reflected in the Return of Summons filed in this case. [Dkt. 30]. As of the filing of this Motion, more than twenty-one (21) days have expired since electronic service was effectuated on Defendant. Defaulting Defendant has not answered or otherwise responded to Plaintiff's First Amended Complaint in this action.

5. Plaintiff's asserted claims for relief in this action involve the intentional, willful infringement of the following federally registered copyright protected image: VA0002441336. (the "Copyright Protected Image").

6. As alleged in the First Amended Complaint, the Defaulting Defendant has displayed, without authorization, the Copyright Protected Image on the TikTok online sales platform (the "Platform") to market and sell competing products using Plaintiff's Copyright Protected Image through their online store (the "Online Store"), thereby deceiving public consumers as to the quality, nature, and source of goods being purchased.

7. Plaintiff requests statutory damages in this action as described in **Exhibit 1** to this Declaration, which shows the Statutory Damages Request based on the copyright infringement. First, the Defaulting Defendant was 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.

8. I have been informed by Plaintiff that the aggregate minimum revenue generated from the use of the entire Group Registration of Published Photographs ("GRPPH") in the

VA0002441336 Copyright since 2024 is approximately \$28,000.00. The approximate revenue for the GRPPH provides a reasonable and conservative measure of value for purposes of statutory damages.

9. In addition, defendants in multiple copyright enforcement actions in this judicial district, have been acting through their network to 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, and the viability of appearing and asserting potential defenses.

10. To maximize the deterrent effect of the Court's anticipated default judgment, Plaintiff is asking that enhanced statutory damages be imposed on the Defaulting Defendant for each alleged infringement of the Copyright Protected Image.

11. Such an award precludes the Defaulting Defendant from shielding themselves from monetary responsibility for the collective infringement of common Copyright Protected Image. *Desire, LLC v. Manna Textiles, Inc.*, 986 F.3d 1253, 1264-1272 (9th Cir. 2021). Rather, Plaintiff expressly requests that the Defaulting Defendant, be assessed an enhanced statutory damage award as described in **Exhibit 1** to this Declaration for their infringement of the Copyright Protected Image.

12. Plaintiff has alleged, and has offered proof, that the Defaulting Defendant has engaged in the infringement of the Copyright Protected Image.

13. The presented facts establish the Defaulting Defendant's knowledge and intentional infringement of Plaintiff's Copyright Protected Image. Accordingly, Plaintiff should be awarded statutory damages as described in **Exhibit 1** to this Declaration, with the enhancement against Defaulted Defendant based on their willful infringement of the Copyright Protected Image.

14. My office, with assistance from our client and those assisting our client, investigated the infringing activities of the Defaulting Defendant, including attempting to identify their contact information. Our investigation confirmed that the Defaulting Defendant is primarily domiciled in Asia. As such, I am informed and believe that the Defaulting Defendant is not an active-duty member of the U.S. armed forces.

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

DATED: May 11, 2026

By: /s/ Joseph W. Droter
Joseph W. Droter, Esq.
BAYRAMOGLU LAW OFFICES, LLC

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May 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, TikTok.

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

Defendant Name	Email Address
DAFFODILY	yaolikeji@163.com

Exhibit 1

Defaulted Defendant 1:25-cv-15686

Seller's Name	Minimum Revenue of the GRPPH Copyright since 2024	Copyright Infringed	Statutory Amount Request	Enhanced x3 Willful Statutory Amount Request
DAFFODILY	\$28,000.00	VA0002441336	\$5,000	\$15,000
				TOTAL: \$15,000

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

WUMEI LIN,

Plaintiff,

v.

DAFFODILY,

Defendant.

Case No. 1:25-cv-15686-MMP-JTG

Honorable Martha M. Pacold

Magistrate Jeffrey T. Gilbert

**DECLARATION OF WUMEI LIN IN SUPPORT OF PLAINTIFF'S
MOTION FOR ENTRY OF DEFAULT JUDGMENT**

I, Wumei Lin, of Shenzhen City, Guangdong Province of the People's Republic of China, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Motion for Entry of Default Judgment (the "Motion").

3. I am the owner of the image protected by copyright registration VA0002441336 (the "Copyright Protected Image"). I make this declaration from matters within my own personal knowledge unless stated otherwise.

4. I license the Copyright Protected Image to certain companies for use in connection with the advertising and sale of clothing and apparel. The Defaulting Defendant is not authorized to reproduce, distribute, or display the Copyright Protected Image.

5. Plaintiff seeks an award of statutory damages against the defaulted Defendant (“Defaulting Defendant”) in this action. The Defaulting Defendant is accused of intentionally and willfully infringing Plaintiff’s federally registered copyright asserted in this action, VA0002441336. (the “Copyright Protected Image”).

6. It is without question that the Defaulting Defendant has engaged in the intentional misappropriation and unauthorized use of the Copyright Protected Image. In this regard, Plaintiff’s Copyright Protected Image, without obtaining a license, have appeared on the Defaulting Defendant’s online stores maintained with the TikTok Platform (the “Online Stores”).

7. I have reviewed Plaintiff’s revenue from Plaintiff’s federally registered copyright asserted in this action, VA0002441336, which includes the Copyright Protected Image and the entire Group Registration of Published Photographs (“GRPPH”) in the Copyright. The minimum aggregate revenue since 2024 generated from the use of the Copyright Protected Image and GRPPH is approximately \$28,000.00. The approximate minimum revenue average provides a reasonable and conservative measure of value for purposes of Plaintiff’s request for statutory damages.

8. The Defaulting Defendant has intentionally used the Copyright Protected Image for soliciting their product sales without obtaining a license and has never been authorized to use the Copyright Protected Image.

9. It is impossible to definitively calculate the Defaulting Defendant’s total sales on the Platform through their Online Store or to ascertain their expenses related to their infringing sales because they have failed to appear, defend, or otherwise participate in this action.

10. The Defaulting Defendant named in Plaintiff’s copyright infringement enforcement action is engaged in the practice of copying Plaintiff’s copyright protected image and then

associating that image with sale and promotion of unauthorized products of questionable quality, thereby deceiving consumers, including the citizens of the State of Illinois. Plaintiff maintains that the Defaulting Defendant is willfully acting to copy the Copyright Protected Image, without authorization.

11. Plaintiff has suffered, and continues to suffer, irreparable harm through the Defaulting Defendant's unauthorized use of its federally registered copyright protected image asserted in this action. This results in the direct harm to Plaintiff's reputation and loss of exclusive licenses, 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 May 11, 2026, in Shenzhen City, Guangdong Province of the People's Republic of China.

By: /s/ Wumei Lin
WUMEI LIN

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May 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, TikTok.

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

Defendant Name	Email Address
DAFFODILY	yaolikeji@163.com