

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED, a Corporation

Plaintiff,

v.

BYMAYBERRY.COM, a Business Entity

Defendant.

Case No. 1:26-cv-

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

JURY TRIAL DEMANDED

Plaintiff, Hong Kong Leyuzhen Technology Co. Limited (“Plaintiff”), by and through its counsel, submits the following Complaint against the Defendant, bymayberry.com (“Defendant”), and hereby alleges as follows:

NATURE OF THE ACTION

1. Plaintiff is the owner of all rights, title and interest in the copyright registrations issued by the United States Copyright Office for certain images related to its Rotita Brand (the “Rotita Brand”) used in connection with promoting and selling women’s apparel (the “Copyright Protected Photos”), and bearing the copyrights in the following table which constitutes the “Copyright Protected Photos”:

The 20 Infringed Copyrights	
VA0002379881	VA0002414332
VA0002379894	VA0002415182
VA0002379895	VA0002416206
VA0002379897	VA0002416231
VA0002381117	VA0002416248
VA0002381840	VA0002416896
VA0002413196	VA0002417354
VA0002413494	VA0002436262
VA0002414218	VA0002436255
VA0002414223	VA0002438935

2. Plaintiff filed this action to combat Defendant's unauthorized reproduction, display, distribution, and use of Plaintiff's Copyright-Protected Photos to advertise, market, offer for sale, and sell competing apparel products through Defendant's commercial website, bymayberry.com.

3. Defendant copied and displayed Plaintiff's Copyright-Protected Photos on active commercial product listings on Defendant's website without Plaintiff's authorization, consent, or license.

4. Plaintiff uses the Copyright-Protected Photos in connection with promoting and selling genuine Rotita Brand products through Plaintiff's authorized online sales channels.

5. Defendant reproduced identical or substantially similar copies of Plaintiff's Copyright-Protected Photos on Defendant's commercial website to market competing products.

6. Defendant's unauthorized use of the Copyright-Protected Photos is likely to mislead consumers into believing that Defendant's products are associated with, authorized by, sponsored by, or otherwise affiliated with Plaintiff.

7. Publicly available consumer complaints concerning Defendant's website indicate that consumers purchased products from Defendant believing the products reflected the products depicted in Defendant's advertisements but later complained that the products materially differed from the advertised images. *See Exhibit 3* the Better Business Bureau's Scam Tracker Report on bymayberry.com.

8. Publicly available complaints further indicate that Defendant represents itself as associated with "Mayberry North Carolina," while consumers report receiving products shipped from China and being directed to return products to China. *See Exhibit 3*.

9. Plaintiff has suffered and continues to suffer irreparable harm, including consumer confusion, reputational injury, loss of goodwill, market disruption, and loss of licensing opportunities as a result of Defendant's unauthorized use of the Copyright-Protected Photos.

10. Unless restrained by this Court, Defendant will continue infringing Plaintiff's copyrights and continue causing irreparable harm to Plaintiff.

JURISDICTION AND VENUE

11. This Court has original subject matter jurisdiction over the claims in this action pursuant to the Federal Copyright Act, 17 U.S.C. § 101 et seq., 28 U.S.C. §§ 1331 and 1338(a).

12. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b)(2) and 1400(a) because Defendant has committed acts of copyright infringement within this District and regularly conducts business within this District.

13. This Court may properly exercise personal jurisdiction over Defendant because Defendant purposefully directs commercial activities toward Illinois residents through its interactive commercial website.

14. Defendant operates a commercial, interactive e-commerce website through which consumers in Illinois may browse products, place orders, submit payment, and arrange shipment of products into Illinois.

15. Upon information and belief, Defendant has repeatedly transacted business with Illinois consumers through its website.

16. Plaintiff conducted a purchase investigation through Defendant's website and successfully purchased products from Defendant for shipment into Chicago, Illinois. Defendant accepted payment via PayPal in United States currency from an Illinois shipping and billing

address and confirmed shipment of products into Illinois. *See Exhibit 2* screenshot evidence of Defendant's infringing activities and purchase receipts.

17. Upon information and belief, Defendant processes payments through PayPal and other electronic payment processors while conducting business with consumers located in Illinois and throughout the United States.

18. Publicly available Better Business Bureau complaints concerning bymayberry.com include multiple complaints from Illinois consumers who purchased products from Defendant through Defendant's website. *See Exhibit 3*.

19. Defendant's conduct has caused substantial injury to Plaintiff within Illinois.

20. Defendant has committed tortious acts within Illinois while engaging in interstate and international commerce.

THE PARTIES

21. Plaintiff Hong Kong Leyuzhen Technology Co. Limited is a corporation organized under the laws of the People's Republic of China.

22. Plaintiff owns all rights, title, and interest in the Copyright-Protected Photos at issue in this case.

23. Attached as **Exhibit 1** are true and correct copies of the federal copyright registrations for the Copyright-Protected Photos.

24. Plaintiff founded its Rotita Brand in approximately 2009 and has since invested substantial time, labor, money, and resources into developing, marketing, promoting, and protecting the Rotita Brand and the associated Copyright-Protected Photos.

25. Plaintiff uses the Copyright-Protected Photos to advertise and sell genuine Rotita Brand products.

26. Plaintiff owns the exclusive rights to reproduce, distribute, publicly display, and authorize use of the Copyright-Protected Photos.

27. Plaintiff has not authorized Defendant to reproduce, display, distribute, or use the Copyright-Protected Photos.

28. Defendant operates the commercial e-commerce website located at bymayberry.com.

29. Defendant advertises, markets, offers for sale, and sells apparel and swimwear products through the bymayberry.com website.

30. Upon information and belief, Defendant operates under the business name “AMSTUDIO.”

31. Defendant’s website publicly lists a Belgium address, identifies a warehouse address in Guangdong, China, and represents itself as “Mayberry North Carolina.” *See Exhibit 4* evidence from Defendant’s webpage.

32. Defendant’s website lists the following contact information: Company Name: AMSTUDIO; Registration Number: 1012.190.248; Email Address: hello@bymayberry.com; and Belgium and China addresses. *See Exhibit 4.*

33. Publicly available WHOIS records for bymayberry.com identify “AMSTUDIO” as the registrant organization and identify Namecheap Inc. as the registrar for the bymayberry.com domain.

34. Upon information and belief, Defendant uses conflicting geographic representations and business information in connection with operating the bymayberry.com website. *See Exhibits 4-5.*

35. Publicly available consumer complaints concerning Defendant's website report that Defendant represents itself as located in North Carolina while products are allegedly shipped from China. *See Exhibit 3.*

36. Defendant's true residency, citizenship, and full operational structure remain unclear. *See Exhibits 3-5.*

37. Plaintiff's pre-suit investigation revealed conflicting information regarding Defendant's geographic location, operational identity, and fulfillment operations.

38. Upon information and belief, Defendant operates foreign fulfillment operations while targeting consumers throughout the United States, including Illinois.

39. Defendant offered for sale, sold, and continues to offer for sale and sell products using Plaintiff's Copyright-Protected Photos without authorization.

40. **Exhibit 2** contains representative side-by-side comparisons showing Defendant's unauthorized reproduction and display of Plaintiff's Copyright-Protected Photos on Defendant's website.

DEFENDANT'S UNLAWFUL CONDUCT

41. Plaintiff's Copyright-Protected Photos are original copyrighted works protected under the Copyright Act.

42. Defendant copied, reproduced, displayed, distributed, and used Plaintiff's Copyright-Protected Photos on Defendant's commercial website without authorization.

43. Defendant displayed Plaintiff's Copyright-Protected Photos on active product listings to advertise and sell competing apparel and swimwear products.

44. Defendant's use of the Copyright-Protected Photos was and continues to be commercial in nature.

45. Upon information and belief, Defendant knew or should have known that the Copyright-Protected Photos were protected by federal copyright law.

46. Defendant used the Copyright-Protected Photos to attract consumers to Defendant's commercial website and generate sales.

47. Defendant's unauthorized use of the Copyright-Protected Photos is likely to cause confusion and deception among consumers regarding the source, sponsorship, affiliation, or approval of Defendant's products.

48. Publicly available consumer complaints concerning Defendant's website indicate that consumers believed products purchased from Defendant would reflect the products depicted in Defendant's advertisements. *See Exhibit 3.*

49. Publicly available consumer complaints further indicate that consumers received products materially different from the products depicted in Defendant's advertisements. *See Exhibit 3.*

50. Upon information and belief, Defendant derives substantial revenue from sales generated through Defendant's unauthorized use of Plaintiff's Copyright-Protected Photos.

51. Defendant's infringement has caused and continues to cause substantial and irreparable injury to Plaintiff.

52. Unless restrained by this Court, Defendant will continue infringing Plaintiff's copyrights.

COUNT I
COPYRIGHT INFRINGEMENT (17 U.S.C. § 101, et seq.)

53. Plaintiff repeats, realleges, and incorporates by reference herein its allegations contained in paragraphs 1 through 52, above.

54. Plaintiff's Copyright-Protected Photos have significant value and have been produced and created at considerable expense.

55. Plaintiff holds all exclusive rights, including, but not limited to, the rights to reproduce the Copyright-Protected Photos in copies, create derivative works based on the copyrighted work, and distribute copies of the copyrighted work to the public through sale, transfer of ownership, rental, lease, or lending.

56. The Defendant has sold, offered to sell, marketed, distributed, and advertised, and continues to do so, products using the Copyright-Protected Photos without the Plaintiff's permission, authorization, consent, or license.

57. The Defendant has directly copied the Copyright-Protected Photos and used them without permission to advertise, promote, offer for sale, and sell low-quality competing products.

58. Defendant's unauthorized use of Copyright-Protected Photos to advertise, offer for sale, and sell inferior products on Defendant's Online Store constitutes copyright infringement.

59. Based on information and belief, Defendant's infringing acts were willful, deliberate, and carried out with prior notice and knowledge of the Copyright-Protected Photos.

60. Defendant either knew or should have reasonably known that the Copyright-Protected Photos are subject to federal copyright protection.

61. As a direct and immediate result of their unauthorized and infringing actions, the Defendant has obtained and continues to benefit from both direct and indirect profits and other advantages that rightfully belong to the Plaintiff—benefits they would not have received without infringing on the Plaintiff's Copyright-Protected Photos.

62. Accordingly, Plaintiff seeks an award of damages pursuant to 17 U.S.C. § 504.

63. In addition to actual damages, Plaintiff is entitled to receive the profits made by Defendant from its wrongful acts, pursuant to 17 U.S.C. § 504(b).

64. Defendant should be required to account for all gains, profits, and advantages derived by Defendant from its acts of infringement.

65. In the alternative, Plaintiff is entitled to and may elect to choose statutory damages pursuant to 17 U.S.C. § 504(c).

66. Statutory damages, if elected, should be enhanced by 17 U.S.C. § 504(c)(2) because of Defendant's willful copyright infringement.

67. Plaintiff is entitled to injunctive relief under 17 U.S.C. § 502, enjoining any use or exploitation by Defendant of its infringing work, and for an order under 17 U.S.C. § 503 that any of Defendant's infringing products be impounded and destroyed.

68. Plaintiff seeks and is also entitled to recover reasonable attorneys' fees and costs of suit pursuant to 17 U.S.C. § 505.

69. If the Defendant's actions are not enjoined, the Plaintiff will keep experiencing irreparable damage to the reputation and goodwill of the Rotita Brand.

70. The conduct of Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff significant and irreparable injury that cannot fully be compensated or measured monetarily.

71. Plaintiff has no adequate remedy at law, because monetary damages will be insufficient.

72. Pursuant to 17 U.S.C. §§502 and 503, Plaintiff is entitled to injunctive relief to prevent Defendant from further infringing the Copyright-Protected Photos and to order Defendant to destroy all unauthorized copies. Any copies, plates, or other embodiments of the copyrighted

works from which copies can be made should be restricted and transferred to Plaintiff as instruments of infringement. Additionally, all infringing copies made by Defendant should be seized and forfeited to Plaintiff under 17 U.S.C. §503.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

1. That Defendant, its affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with Defendant be temporarily, preliminarily, and permanently enjoined and restrained from:

a. Using Plaintiff's Copyright-Protected Photos or any reproductions, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Rotita Brand product or is not authorized by Plaintiff to be sold in connection with its registered copyrights:

b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Rotita Brand product or any other product produced by Plaintiff by using the Copyright-Protected Photos to sell and offer for sale such products that are not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff;

c. committing any acts calculated to cause consumers to believe that Defendant's inferior products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff or its Rotita Brand;

d. further infringing the Copyright-Protected Photos and damaging Plaintiff's Rotita Brand's reputation and goodwill;

e. otherwise competing unfairly with Plaintiff through the unauthorized use of the Copyright-Protected Photos in any manner;

f. shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory sold or offered for sale through the unauthorized use of the Copyright-Protected Photos;

g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendant's website or any other domain name or online marketplace account that is being used to sell or is the means by which Defendant could continue to sell competing products through the unauthorized use of the Copyright-Protected Photos; and

h. operating and/or hosting websites and any other domain names registered or operated by Defendant that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product through the unauthorized use of the Copyright-Protected Photos.

2. That Defendant, within fourteen (14) days after service of judgment with notice of entry thereof upon them, be required to file with the Court and serve upon Plaintiff a written report under oath setting forth in detail the manner and form in which Defendant has complied with paragraph 1 above;

3. Entry of an Order that, upon Plaintiff's request, those in privy with Defendant and those with notice of the injunction, including hosts for Defendants' websites and domain name registrars, shall:

a. disable and cease providing services for any accounts through which Defendant engages in the sale of knockoff Rotita Brand products by using, without authorization, the Copyright-Protected Photos;

b. disable and cease displaying any advertisements used by or associated with Defendants that display the Copyright-Protected Photos; and

c. take all necessary steps to prevent links to Defendant's Online Store from

displaying in search results, including, but not limited to, removing links to Defendant's domain names from any search index.

4. That Defendant account for and pay to Plaintiff all profits realized by their unauthorized use of the Copyright-Protected Photos.

5. In the alternative, that Plaintiff be awarded statutory damages of not less than \$750 and not more than \$30,000 for each infringement of the Copyright-Protected Photos pursuant to 17 U.S.C. § 504(c), which should be enhanced to a sum of not more than \$150,000 by 17 U.S.C. § 504(c)(2) because of Defendant's willful copyright infringement.

6. That Plaintiff be awarded its reasonable attorneys' fees and costs; and

7. Award any other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff also demands a trial by jury of all issues so triable pursuant to Federal Rule of Civil Procedure 38.

Dated: May 19, 2026

Respectfully Submitted,

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)
William R. Brees (FL Bar No. 98886)
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william@bayramoglu-legal.com
Attorneys for Plaintiff

Exhibit 1

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

United States Register of Copyrights and Director

Registration Number
VA 2-379-881

Effective Date of Registration:
November 12, 2023

Registration Decision Date:
January 22, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 31, 2019 to December 23, 2019

Title

Title of Group: Rotita10-2019
Number of Photographs in Group: 302

Completion/Publication

Year of Completion: 2019
Earliest Publication Date in Group: January 31, 2019
Latest Publication Date in Group: December 23, 2019
Nation of First Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A, 9/F SILVERCORP INTERNATIONAL TOWER, 707-713
NATHAN ROAD, MONGKOK, KOWLOON, Hong Kong, 999077, Hong Kong

Rights and Permissions

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Telephone: (702)462-5973
Address: 1540 West Warm Springs Road
Suite 100
Henderson, NV 89014

Certification

Name: Nazly Bayramoglu
Date: November 12, 2023

Correspondence: Yes
Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Registration #: VA0002379881
Service Request #: 1-13195130423



Bayramoglu Law Offices
Nazly Aileen Bayramoglu
1540 West Warm Springs Road
Suite 100
Henderson, NV 89014



Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

United States Register of Copyrights and Director

Registration Number
VA 2-379-894

Effective Date of Registration:
November 12, 2023

Registration Decision Date:
January 22, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 04, 2022 to December 30, 2022

Title

Title of Group: Rotita6-2022
Number of Photographs in Group: 448

Completion/Publication

Year of Completion: 2022
Earliest Publication Date in Group: January 04, 2022
Latest Publication Date in Group: December 30, 2022
Nation of First Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A, 9/F SILVERCORP INTERNATIONAL TOWER, 707-713
NATHAN ROAD, MONGKOK, KOWLOON, Hong Kong, 999077, Hong Kong

Rights and Permissions

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Address: 1540 West Warm Springs Road
Suite 100
Henderson, NV 89014

Certification

Name: Nazly Bayramoglu
Date: November 12, 2023

Correspondence: Yes
Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Registration #: VA0002379894
Service Request #: 1-13195071562



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Henderson, NV 89014



Certificate of Registration



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United States Register of Copyrights and Director

Registration Number
VA 2-379-895

Effective Date of Registration:
November 12, 2023

Registration Decision Date:
January 22, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 19, 2021 to December 30, 2021

Title

Title of Group: Rotita5-2021
Number of Photographs in Group: 337

Completion/Publication

Year of Completion: 2021
Earliest Publication Date in Group: January 19, 2021
Latest Publication Date in Group: December 30, 2021
Nation of First Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
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NATHAN ROAD, MONGKOK, KOWLOON, Hong Kong, 999077, Hong Kong

Rights and Permissions

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Address: 1540 West Warm Springs Road
Suite 100
Henderson, NV 89014

Certification

Name: Nazly Bayramoglu
Date: November 12, 2023

Correspondence: Yes
Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Registration #: VA0002379895
Service Request #: 1-13195071494



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Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

United States Register of Copyrights and Director

Registration Number

VA 2-379-897

Effective Date of Registration:

November 12, 2023

Registration Decision Date:

January 22, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 04, 2023 to October 06, 2023

Title

Title of Group: Rotita4-2023

Number of Photographs in Group: 275

Completion/Publication

Year of Completion: 2023

Earliest Publication Date in Group: January 04, 2023

Latest Publication Date in Group: October 06, 2023

Nation of First Publication: United States

Author

- **Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
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Address: 1540 West Warm Springs Road
Suite 100
Henderson, NV 89014

Certification

Name: Nazly Bayramoglu
Date: November 12, 2023

Correspondence: Yes
Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Registration #: VA0002379897
Service Request #: 1-13194964937



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Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Shirley R. Primm
United States Register of Copyrights and Director

Registration Number
VA 2-381-117

Effective Date of Registration:
November 07, 2023
Registration Decision Date:
February 01, 2024

Title

Title of Work: 210303731R-3

Completion/Publication

Year of Completion: 2021
Date of 1st Publication: March 03, 2021
Nation of 1st Publication: United States

Author

• Author: HONGKONG LEYUZHEN TECHNOLOGY CO., LIMITED
Author Created: 2-d artwork of digital model, dressed, and in posed posture
Work made for hire: Yes
Citizen of: Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO., LIMITED
FLAT/RM-A, 9/F SILVERCORP INTERNATIONAL TOWER, 707, 713
NATHAN ROAD, MONGKOK, KOWLOON, HONG KONG, 999077, Hong
Kong

Rights and Permissions

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Suite 100
Henderson NV 89014

Certification

Name: Nazly Bayramoglu
Date: November 07, 2023

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: No registration for clothing itself and the applied designs in the clothing.



Registration Number

VA 2-381-840

Effective Date of Registration:

February 05, 2024

Registration Decision Date:

March 07, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 02, 2024 to February 02, 2024

Title

Title of Group: Rotita39-2024

Number of Photographs in Group: 740

Completion/Publication

Year of Completion: 2024

Earliest Publication Date in Group: January 02, 2024

Latest Publication Date in Group: February 02, 2024

Nation of First Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Certification

Name: Claire Young
Date: February 05, 2024

Correspondence: Yes

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Basis for Registration: See photograph title list for the correct photograph publication date range and number of photos covered by this registration.



-32%



©ROTITA

Registration Number

VA 2-413-196

Effective Date of Registration:

April 25, 2024

Registration Decision Date:

September 18, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 06, 2023 to December 30, 2023

Title

Title of Group: Rotita33-2023

Number of Photographs in Group: 748

Completion/Publication

Year of Completion: 2023

Earliest Publication Date in Group: January 06, 2023

Latest Publication Date in Group: December 30, 2023

Nation of First Publication: United States

Author

• **Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED

Author Created: photographs

Work made for hire: Yes

Citizen of: Hong Kong

Domiciled in: Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Certification

Name: Claire Yang

Date: December 19, 2023

Correspondence: Yes

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.



Registration Number

VA 2-413-494

Effective Date of Registration:

January 12, 2024

Registration Decision Date:

September 20, 2024

Title

Title of Work: T230223731R

Completion/Publication

Year of Completion: 2023

Date of 1st Publication: February 24, 2023

Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** 3-D artwork
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: 3-D artwork, photograph

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young

Date: June 26, 2024

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: Registration does not extend to any useful article depicted. Registration extends to deposited artwork only. 17 USC 101, 102(a), and 113.



Registration Number

VA 2-414-218

Effective Date of Registration:

January 11, 2024

Registration Decision Date:

September 25, 2024

Title

Title of Work: 220629805R

Completion/Publication

Year of Completion: 2022
Date of 1st Publication: June 29, 2022
Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
Author Created: 3-D artwork
Work made for hire: Yes
Citizen of: Hong Kong
Domiciled in: Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: photograph, 3-D artwork

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young
Date: May 30, 2024

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: Registration does not extend to any useful article depicted. Registration extends to deposited artwork only. 17 USC 101, 102(a), and 113.



**Sold
Separately**



Registration Number

VA 2-414-223

Effective Date of Registration:

January 12, 2024

Registration Decision Date:

September 25, 2024

Title

Title of Work: 230505767R

Completion/Publication

Year of Completion: 2023
Date of 1st Publication: May 06, 2023
Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
Author Created: 3-D artwork
Work made for hire: Yes
Citizen of: Hong Kong
Domiciled in: Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: photograph, 3-D artwork

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young
Date: January 11, 2024

Copyright Office notes: Regarding basis for registration: Registration does not extend to any useful article depicted. Registration extends to deposited artwork only. 17 USC 101, 102(a), and 113.



Registration Number

VA 2-414-332

Effective Date of Registration:

January 11, 2024

Registration Decision Date:

September 25, 2024

Title

Title of Work: T230222773R

Completion/Publication

Year of Completion: 2023

Date of 1st Publication: February 23, 2023

Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** 2-D artwork
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: photograph

New material included in claim: 2-D artwork, new depiction of model in clothing

Certification

Name: Claire Young

Date: June 26, 2024

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: Registration does not extend to any useful article depicted. Registration extends to deposited artwork only. 17 USC 101, 102(a), and 113.



Registration Number

VA 2-415-182

Effective Date of Registration:

September 25, 2024

Registration Decision Date:

September 30, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 16, 2024 to August 09, 2024

Title

Title of Group: Rotita40-2024

Number of Photographs in Group: 497

Completion/Publication

Year of Completion: 2024

Earliest Publication Date in Group: January 16, 2024

Latest Publication Date in Group: August 09, 2024

Nation of First Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM 511, 5/F MING SANG INDUSTRIAL BUILDING, 19-21 HING
YIP ST KWUN TONG, KL HONGKONG., Hong Kong

Certification

Name: Claire Young
Date: August 30, 2024

Correspondence: Yes

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.



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Registration Number

VA 2-416-206

Effective Date of Registration:

January 12, 2024

Registration Decision Date:

October 04, 2024

Title

Title of Work: 211216768R

Completion/Publication

Year of Completion: 2021

Date of 1st Publication: December 16, 2021

Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** 3-D artwork
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: 3-D artwork, photograph

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young

Date: May 30, 2024

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: Registration does not extend to any useful article depicted. Registration extends to deposited artwork only. 17 USC 101, 102(a), and 113.



Registration Number
VA 2-416-231
Effective Date of Registration:
January 11, 2024
Registration Decision Date:
October 04, 2024

Title

Title of Work: T230223730R

Completion/Publication

Year of Completion: 2023
Date of 1st Publication: February 24, 2023
Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
Author Created: 3-D artwork
Work made for hire: Yes
Citizen of: Hong Kong
Domiciled in: Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: 3-D artwork, photograph

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young
Date: May 30, 2024

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: Registration does not extend to any useful article depicted. Registration extends to deposited artwork only. 17 USC 101, 102(a), and 113.



Registration Number

VA 2-416-248

Effective Date of Registration:

January 12, 2024

Registration Decision Date:

October 04, 2024

Title

Title of Work: 221129670R

Completion/Publication

Year of Completion: 2022

Date of 1st Publication: November 30, 2022

Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** 3-D artwork
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: 3-D artwork, photograph

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young

Date: May 30, 2024

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: Registration does not extend to any useful article depicted. Registration extends to deposited artwork only. 17 USC 101, 102(a), and 113.



Registration Number

VA 2-416-896

Effective Date of Registration:

January 26, 2024

Registration Decision Date:

October 08, 2024

Title

Title of Work: 230714730R

Completion/Publication

Year of Completion: 2023

Date of 1st Publication: July 17, 2023

Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** 3-D artwork
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: 3-D artwork, photograph

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young

Date: May 28, 2024

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: Registration does not extend to any useful article depicted. Registration extends to deposited artwork only. 17 USC 101, 102(a), and 113.



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Registration Number

VA 2-417-354

Effective Date of Registration:

January 26, 2024

Registration Decision Date:

October 10, 2024

Title

Title of Work: 231208803R

Completion/Publication

Year of Completion: 2023

Date of 1st Publication: December 13, 2023

Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** 3-D artwork
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: 3-D artwork, photograph

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young

Date: May 28, 2024

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: Registration does not extend to any useful article depicted. Registration extends to deposited artwork only. 17 USC 101, 102(a), and 113.



Registration Number
VA 2-436-255
Effective Date of Registration:
September 01, 2024
Registration Decision Date:
March 07, 2025

Title

Title of Work: 240710662R

Completion/Publication

Year of Completion: 2024
Date of 1st Publication: July 10, 2024
Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
Author Created: 3-D artwork
Work made for hire: Yes
Citizen of: Hong Kong
Domiciled in: Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM 511, 5/F MING SANG INDUSTRIAL BUILDING, 19-21 HING YIP
ST KWUN TONG, KL HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: 3-D artwork, photograph

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young
Date: August 30, 2024



Registration Number

VA 2-436-262

Effective Date of Registration:

September 01, 2024

Registration Decision Date:

March 07, 2025

Title

Title of Work: 240715663R

Completion/Publication

Year of Completion: 2024
Date of 1st Publication: July 15, 2024
Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
Author Created: 3-D artwork
Work made for hire: Yes
Citizen of: Hong Kong
Domiciled in: Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM 511, 5/F MING SANG INDUSTRIAL BUILDING, 19-21 HING YIP
ST KWUN TONG, KL HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: 3-D artwork, photograph

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young
Date: August 30, 2024



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Registration Number

VA 2-438-935

Effective Date of Registration:

February 21, 2025

Registration Decision Date:

March 24, 2025

Title

Title of Work: 240529373R

Completion/Publication

Year of Completion: 2024

Date of 1st Publication: May 31, 2024

Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** 3-D artwork
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM 511, 5/F MING SANG INDUSTRIAL BUILDING, 19-21 HING YIP
ST KWUN TONG, KL HONGKONG., Hong Kong

Limitation of copyright claim

Material excluded from this claim: 3-D artwork, photograph

New material included in claim: 3-D artwork, new depiction of model in clothing

Certification

Name: Claire Young





Date: February 20, 2025



Exhibit 2

Hong Kong Leyuzhen Technology Co. Limited v. bymayberry.com
Infringement Evidence

The screenshot shows the MAYBERRY website interface. At the top, there is a search icon and the MAYBERRY logo with 'NORTH CAROLINA' underneath. A navigation menu includes 'Home', 'All', 'WEDDING SEASON', 'Shop Clothes', 'Shop Shoes', 'Shop Accessories', 'GIFTCARD', 'Contact', 'About Us', 'FAQ', and 'Track my order'. A dark banner below the menu reads '30 DAY RETURNS Hassle-free!'. Below this, a promotional banner repeats 'SPRING SALE | Free Shipping + Up to 50% Off Sitewide'. The main product area features a large image of a woman in a blue and white striped dress. To the right of the image, the product name is 'Breezy | Women's Striped Sleeveless Midi Dress Round Neck Summer Dress', with a price of \$49.95 (marked down from \$60.00, a 17% discount). Below the price, there are icons for 'Free USPS Shipping Within the U.S.', '30 Days Money-Back Guarantee', and 'Buy 2 get 10%, buy 5+ get 25%'. A 'LIMITED SPRING SALE' badge is present, along with a note that 'Limited pairs available during our Spring Sale'. The color is listed as 'Blue-White' and the size options are S, M, L, XL, and 2XL. A note indicates 'Only 6 pairs left in stock.' and an 'ADD TO CART' button is at the bottom.

Copyrighted Photograph	MAYBERRY Photograph	Link to Infringing Photograph
 VA0002438935		https://www.bymayberry.com/collections/dresses-jumpsuits-women/products/breezy-womens-striped-sleeveless-midi-dress-round-neck-summer-dress
 VA0002415182		https://www.bymayberry.com/collections/dresses-jumpsuits-women/products/karla%E2%84%A2-champagne-embroidery-3-4-sleeve-round-neck-dress

Hong Kong Leyuzhen Technology Co. Limited v. bymayberry.com

Infringement Evidence

Copyrighted Photograph	MAYBERRY Photograph	Link to Infringing Photograph
 <p>VA0002413196</p>		<p>https://www.bymayberry.com/collections/dresses-jumpsuits-women/products/katherine%E2%84%A2-navy-lace-short-sleeve-round-neck-dress</p>
 <p>VA0002379881</p>		<p>https://www.bymayberry.com/collections/dresses-jumpsuits-women/products/stella-women-s-plus-size-flowy-draped-midi-dress</p>
 <p>VA0002417354</p>		<p>https://www.bymayberry.com/collections/tops-blouses-women/products/tricia%E2%84%A2-striped-comfort-blouse</p>
 <p>VA0002381840</p>		<p>https://www.bymayberry.com/collections/tops-blouses-women/products/monroe</p>
 <p>VA0002379895</p>		<p>https://www.bymayberry.com/collections/swimwear/products/veronica-women-s-high-waist-floral-swimsuit-for-beach</p>
 <p>VA0002379897</p>		<p>https://www.bymayberry.com/collections/swimwear/products/estelle-women-s-tummy-control-high-waist-printed-bikini-set</p>


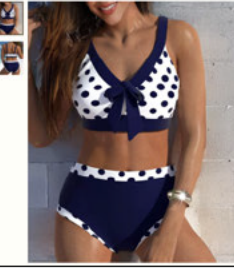
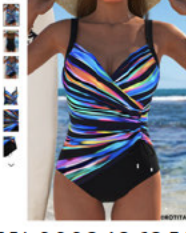
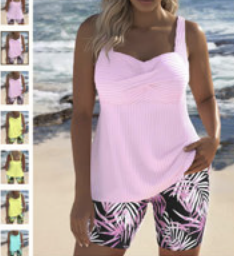
Hong Kong Leyuzhen Technology Co. Limited v. bymayberry.com

Infringement Evidence

Copyrighted Photograph	MAYBERRY Photograph	Link to Infringing Photograph
 <p>VA0002414332</p>		<p>https://www.bymayberry.com/collections/swimwear/products/josephine-women-s-high-waist-flattering-bikini-set</p>
 <p>VA0002416206</p>		<p>https://www.bymayberry.com/collections/swimwear/products/winslow-women-s-tummy-control-flattering-tankini</p>
 <p>VA0002416896</p>		<p>https://www.bymayberry.com/collections/swimwear/products/vicki</p>
 <p>VA0002416248</p>		<p>https://www.bymayberry.com/collections/swimwear/products/gladys</p>
 <p>VA0002381117</p>		<p>https://www.bymayberry.com/collections/swimwear/products/beatrice-women-s-printed-flattering-bikini-set</p>
 <p>VA0002414218</p>		<p>https://www.bymayberry.com/collections/swimwear/products/myrtle%E2%84%A2-printed-tankini</p>

Hong Kong Leyuzhen Technology Co. Limited v. bymayberry.com

Infringement Evidence

Copyrighted Photograph	MAYBERRY Photograph	Link to Infringing Photograph
 VA0002414223		https://www.bymayberry.com/collections/swimwear/products/blanche%E2%84%A2-trendy-tankini?variant=51144472625488
 VA0002416231		https://www.bymayberry.com/collections/swimwear/products/caroline-women-s-high-waist-striped-bikini-set
 VA0002413494		https://www.bymayberry.com/collections/swimwear/products/gabrielle-women-s-high-waist-retro-bikini-set
 VA0002436255		https://www.bymayberry.com/collections/swimwear/products/violette-women-s-tummy-control-printed-swimsuit
 VA0002379894		https://www.bymayberry.com/collections/swimwear/products/laurie%E2%84%A2-body-shaping-bikini
 VA0002436262		https://www.bymayberry.com/collections/swimwear/products/colette-women-s-tummy-control-printed-tankini

Hong Kong Leyuzhen Technology Co. Limited v. bymayberry.com

Infringement Evidence



MAYBERRY

NORTH CAROLINA

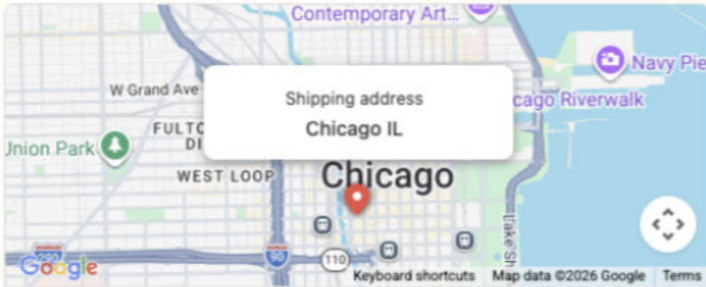
★★★★☆ 4.7 | Rated Excellent

Your cart is reserved for 10 minutes.



Confirmation #4Q7W8DKPV

Thank you, [REDACTED]!



Your order is confirmed

You'll receive a confirmation email soon

[Download to track with shop](#)

Order details

Contact information

[REDACTED]

Shipping address

[REDACTED]

Chicago IL 60606-6316
United States

[REDACTED]

Shipping method

Free U.S. Premium Shipping

Payment method

PayPal · \$110.42 USD

Billing address

[REDACTED]

Chicago IL 60606-6316
United States

[REDACTED]

Your information was successfully saved with [shop](#)

[Learn more](#)



1 Monroe™ | Soft Striped Blouse

Pink / S

-15% EXTRA OFF (-\$5.99)

~~\$39.99~~

\$34.00



1 Laurie™ | Body Shaping Bikini

Blue / S

-15% EXTRA OFF (-\$5.99)

~~\$39.95~~

\$33.96



1 Breezy | Women's Striped Sleeveless

Midi Dress Round Neck Summer Dress

Blue-White / S

-15% EXTRA OFF (-\$7.49)

~~\$49.95~~

\$42.46

Subtotal · 3 items

\$110.42

Shipping

FREE

Total

USD **\$110.42**

TOTAL SAVINGS \$19.47

Exhibit 3



My BBB

BBB Scam Tracker

Report a scam. Search scams. Protect yourself and others.

Look Up a Scam

Filter

Search

mayberry x

Search Results (78)

Online Purchase

I ordered and received a jacket from **Mayberry**, but the quality is far inferior than advertised. I tried to return the item for the past week, but I continue to get a runaround from their team without any return labels or information. The...

Dollars Lost: \$69.95



Victim Location: MA, USA - 02136

Date Reported: April 24, 2026

Business Name Used: Mayberry North Carolina

Counterfeit Product

Be aware of the refunds to this CHINA ADDRESS ; Name:Wu Xi
Address:Building 4, 4th floor,58 Baiye road City:Dongguan
Province:Guangdong Postal Code :523000 Phone:+86 19329021556. I wish I...

Dollars Lost: \$45



Victim Location: NC, USA - 27520

Date Reported: April 24, 2026

Business Name Used: Mayberry North Carolina

Online Purchase - Online Retailer Scam

Would not share return process. Shoes were completely unworn and in their original packaging. I provided photos and answered all the questions they asked but they kept offering to send me additional items if i paid shipping....

Dollars Lost: \$49.99



Victim Location: NY, USA - 11762

Date Reported: April 22, 2026

Business Name Used: Mayberry

Online Purchase - ByMayberry

Do not buy from this company before you read their return policy. I ordered a large size dress which was very large and decided it needed to go back. I wasn't happy with the material but decided that didn't matter because I'm...

Dollars Lost: \$37.46



Victim Location: MN, USA - 55075

Date Reported: April 22, 2026

Business Name Used: ByMayberry

Online Purchase

The advertised photo was not what I got.

Dollars Lost: \$49.99

Victim Location: OH, USA - 45440

Date Reported: April 22, 2026

Business Name Used: Mayberry

Online Purchase - Mayberry / AMSTUDIO Online Retail and Counterfeit Product Scam

I ordered a shirt and a pair of shoes and both of them did not match the size measurements on their website and neither item fit me. They in fact were several sizes too small. The quality was incredibly poor, as well. They want m...

Dollars Lost: \$139.42



Victim Location: TX, USA - 75090

Date Reported: April 20, 2026

Business Name Used: Mayberry / AMSTUDIO Online Retail and Counterfeit Product Scam

Online Purchase - Mayberry

Company has a website that look legit and it looks like it is based in the USA. Once an order is placed, it takes weeks to be delivered and clothes showed up from China with no label and cheap material. They don't offer a full refund...

Dollars Lost: \$90



Victim Location: NJ, USA - 07753

Date Reported: April 20, 2026

Business Name Used: Mayberry

Counterfeit Product

This company is a total bait-and-switch operation. They use false advertising and deceptive marketing to trick customers into buying high-end-looking gear that turns out to be "human-sized doll clothes." Despite portraying themselves...

Dollars Lost: \$243.39



Victim Location: CA, USA - 91364

Date Reported: April 19, 2026

Business Name Used: Mayberry - NorthCarolina

Online Purchase - Mayberry clothing

I ordered 3 pair of shoes, they sent me wrong sizes and will not let me return them they keep giving me different reasons in the email

Dollars Lost: \$140



Victim Location: OR, USA - 97140

Date Reported: April 17, 2026

Business Name Used: Mayberry clothing

Online Purchase - Mayberry North Carolina

The clothing store markets themselves as "Mayberry North Carolina" with "over 9K five star reviews". I ordered 10 items of clothing from them. They were delivered two weeks late (it took 25 working days) so I asked to return the...

Dollars Lost: \$110



Victim Location: NJ, USA - 08833

Date Reported: April 17, 2026

Business Name Used: Mayberry North Carolina

< 1 2 3 4 5 ... 8 >

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Search Results (78)

Counterfeit Product - SP **Mayberry** Brugge BE

I placed 3 orders and received packages with product that was scrap not clothing. The company's policy is that with contact within 1 month of delivery, an address will be provided (out of the country) that with paying for shipping...

Dollars Lost: \$359.18



Victim Location: WA, USA - 98223

Date Reported: April 16, 2026

Business Name Used: SP Mayberry Brugge BE

Online Purchase - Online Purchase

Purchased 5 dresses. Requested a return of 3 of the 5 dresses. The response email came back explaining the return policy. The second and third email the company representative ghost me. No refund request address, no itemized...

Dollars Lost: \$150



Victim Location: CA, USA - 92505

Date Reported: April 16, 2026

Business Name Used: Mayberry North Carolina

Online Purchase

THI IS A SCAM!! I found business on google. North Carolina was displayed under the company name. I've requested a refund because the shoes are very cheap looking and do not fit properly. I received an email saying someone will...

Dollars Lost: \$76



Victim Location: FL, USA - 34610

Date Reported: April 16, 2026

Business Name Used: Mayberry

Counterfeit Product - Counterfeit Product

Received product, have 30 days to return. They requested a picture and description of the issue. Color was not as described and product poorly made. Sent the pic same day as requested. Then three follow up email in the...

Dollars Lost: \$54.95



Victim Location: CA, USA - 90620

Date Reported: April 15, 2026

Business Name Used: Bymayberry

Counterfeit Product - **Mayberry** North Carolina bymayberry.com

2 pairs of loafers purchased that were both a structured faux leather. Both pairs arrived significantly larger in size and were extremely flimsy with no support. They were unwearable shoes. When I requested to return as stated on their...

Dollars Lost: \$131.67



Victim Location: IL, USA - 62704

Date Reported: April 14, 2026

Business Name Used: Mayberry North Carolina

Counterfeit Product

Used photos of other sites to show quality products, then sent subpar, cheaply constructed, mis colored clothing and shoes. Took 3 weeks to ship. Says they are in North Carolina, but really in China.

Dollars Lost: \$118



Victim Location: GA, USA - 30046

Date Reported: April 12, 2026

Business Name Used: Mayberry North Carolina

Counterfeit Product - Online Retailer Scam

I saw a lovely spring dress on the site. When I went to the site i saw other items I liked and ordered four items. When they arrived they all were very different from the original picture and material. Also some were large. When I contacte...

Dollars Lost: \$151.88



Victim Location: PA, USA - 19130

Date Reported: April 10, 2026

Business Name Used: Mayberry North Carolina

Online Purchase - **Mayberry** Brugge

I bought a pair of shoes. They took the money out of my account. I never received the shoes.

Dollars Lost: \$59



Victim Location: MI, USA - 49749

Date Reported: April 8, 2026

Business Name Used: Mayberry Brugge

Online Purchase - ByMayberry

Ordered a dress - arrived super late - sent multiple emails asking for the return address - no response

Dollars Lost: \$50



Victim Location: NC, USA - 27357

Date Reported: April 8, 2026

Business Name Used: Mayberry

Counterfeit Product - Online Retail Scam

A dress was advertised on Instagram from a company whose website said they were in North Carolina. There was no business address listed when I ordered, and they claimed 3 women started the business in **Mayberry**, North Carolina....

Dollars Lost: \$55



Victim Location: IL, USA - 60302

Date Reported: April 7, 2026

Business Name Used: Mayberry

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mayberry x

Search Results (78)

Counterfeit Product

I purchased a pair of boots that I had first saw posted on Instagram. I went to the website: www.bymayberry.com and purchased them for \$75.00. Six weeks later I received a package for a pair of boots made from fabric not leather as...

Dollars Lost: \$75



Victim Location: CA, USA - 95614

Date Reported: April 4, 2026

Business Name Used: Mayberry

Other

AVOID **Mayberry** clothing. They claim to be out of North Carolina when they're actually in China. The shoes I ordered were supposed to be leather they were this terrible type of fabric that smelled awful tried to contact them via email fo...

Dollars Lost: \$76



Victim Location: OH, USA - 45068

Date Reported: April 3, 2026

Business Name Used: Mayberry North Carolina

Counterfeit Product - By Mayberry

I ordered a gorgeous midi dress (cream or ivory). The dress arrived VERY cheap, not structured as pictured. It also arrived with two defects that were visible on the light-colored fabric and thus unwearable. I reached out via email...

Dollars Lost: \$59.95



Victim Location: NJ, USA - 08861

Date Reported: April 2, 2026

Business Name Used: By Mayberry

Online Purchase - Online Purchase

I thought this was the printed Mayberry catalog. It is NOT. I ordered over \$460 worth of merchandise but requested by email to cancel right away. No response. Research online shows their Belgium address is a candy shop, thei...

Dollars Lost: \$460



Victim Location: FL, USA - 32082

Date Reported: April 1, 2026

Business Name Used: Mayberry North Carolina

Online Purchase - Mayberry Charlotte, NC

I ordered two vests, size L, one grey, one green. It takes almost a month for the to arrive. They're both slightly too small to wear. the next size up XL is way too large according to their dimensions. So i'm trying to return them. Every email i...

Dollars Lost: \$110.5



Victim Location: NJ, USA - 07002

Date Reported: April 1, 2026

Business Name Used: Mayberry Charlotte NC

Online Purchase - Online Purchase

I ordered two dresses which I received. I wanted to return them and emailed them many times with no response. I tried calling and you get a busy signal. It is a bogus number and so is the company. Shop Name: **Mayberry** advertised...

Dollars Lost: \$75



Victim Location: FL, USA - 32034

Date Reported: March 27, 2026

Business Name Used: MAYBERRY

Counterfeit Product

The clothing sold on this website is not what you end up getting. The material the colors are not the same. It took over two weeks to receive my item. I contacted the company immediately when I received it as they said to email...

Dollars Lost: \$53.96



Victim Location: CA, USA - 90027

Date Reported: March 26, 2026

Business Name Used: Mayberry

Counterfeit Product - Online Retail Scam

I'm so upset. I ordered four tops from this company and they almost looked too good to be true but I went ahead and ordered four items and they were \$150 for all of it and when I received the products they were all very cheaply made...

Dollars Lost: \$150



Victim Location: IL, USA - 60007

Date Reported: March 25, 2026

Business Name Used: Mayberry

Online Purchase - Mayberry North Carolina Online Retail Scam

Company passes for seller of high quality orthopedic shoes. Shoes arrived with the wrong sizing, poor workmanship, and one was missing the insoles. I emailed them providing proof and requesting a resolution since they sent me...

Dollars Lost: \$181.85



Victim Location: TX, USA - 75454

Date Reported: March 21, 2026

Business Name Used: Mayberry North Carolina Online Retail Scam

Online Purchase - hello@bymayberry.com

I ordered a dress that came not as described. Very cheap material, sleeve length and front not as described. Tried to return but found it had to be sent to China to return. This NC based company is actually in China and the product,...

Dollars Lost: \$43



Victim Location: MI, USA - 49424

Date Reported: March 21, 2026

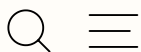
Business Name Used: Mayberry Brugge

< 1 ... 4 5 6 7 8 >

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Exhibit 4



- Home
- All ▾
- WEDDING SEASON
- Shop Clothes ▾
- Shop Shoes ▾
- Shop Accessories ▾
- GIFTCARD
- Contact
- About Us
- FAQ
- Track my order

BUNDLE DEALS

Off Sitewide **SPRING SALE | Free Shipping + Up to 50% Off Sitewide** **SPRING**

Contact

Shop Name: Mayberry
Company Name: AMSTUDIO
Company Registration Number : 1012.190.248
Email: hello@bymayberry.com
Tel.: +1 980 317 2472

Monday – Friday: 9:00 AM – 5:00 PM (EST)

Our customer service team will usually get back to you within 12–24 hours on weekdays. Thank you for your

Get 10% OFF

Address:

Mariastraat 12, 8000 Brugge, Belgium

Warehouse address:

Building 4, 4th Floor, 58 Baiye Road, 523000 Guangdong, China

Do you have any questions?

You can find answers to questions about delivery, returns, orders and other topics in our Frequently Asked Questions:

<https://www.bymayberry.com/pages/faq>

Contact us

NAME

EMAIL

MESSAGE

Exhibit 5



Domains ▾ Websites ▾ Email Hosting ▾ Marketing ▾ Security ▾



Search the WHOIS Database

Search

bymayberry.com is taken
We still might be able to get it for you. [See How](#)

Broker Service Fee
\$ 99.99



Add to Cart

WHOIS search results

Domain Information

Name	BYMAYBERRY.COM
Registry Domain ID	3038003722_DOMAIN_COM-VRSN
Registered On	2025-11-12T11:04:46Z
Expires On	2026-11-12T11:04:46Z
Updated On	2025-11-12T11:04:52Z
Domain Status	client transfer prohibited
Name Servers	DNS1.REGISTRAR-SERVERS.COM DNS2.REGISTRAR-SERVERS.COM

Registrant Contact

Contact Us

Name	Manon Waeyaert
Organization	AMSTUDIO
Phone	tel:+32.470403760
Fax	-
Email	contact@amstudio.group
Mailing Address	Mariastraat 12, Brugge, West Vlaanderen, 8000

Technical Contact



Name	Manon Waeyaert
Organization	AMSTUDIO
Phone	tel:+32.470403760
Fax	-
Email	contact@amstudio.group
Mailing Address	Mariastraat 12, Brugge, West Vlaanderen, 8000

Registrar Information



Name	NAMECHEAP INC
IANA ID	1068
Abuse Contact Email	abuse@namecheap.com
Abuse Contact Phone	tel:+1.9854014545

 **Contact Us**

DNSSEC Information

Delegation Signed

Unsigned

Notice and Remarks

Terms of Service

Service subject to Terms of Use.

<https://www.verisign.com/domain-names/registration-data-access-protocol/terms-service/index.xhtml>

Status Codes

For more information on domain status codes, please visit <https://icann.org/epp>

<https://icann.org/epp>

RDDS Inaccuracy Complaint Form

URL of the ICANN RDDS Inaccuracy Complaint Form: <https://icann.org/wicf>

<https://icann.org/wicf>

Raw RDAP Registry Data 

Raw RDAP Registrar Data 

Find your Domain

Find your perfect domain



 **Contact Us**