

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

Chung Ting Yu,	)	
	)	Case no.: 24-cv-12692
Plaintiff,	)	
	)	Judge: Georgia N Alexakis
v.	)	
	)	Mag. Judge: Young B. Kim
The Partnerships And	)	
Unincorporated Associations	)	
Identified On Schedule "A",	)	
	)	
Defendants.	)	

**DECLARATION OF LYDIA PITTAWAY IN SUPPORT OF
PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT JUDGMENT**

I, Lydia Pittaway, declare and state as follows:

1. I am over 18 years of age.
2. I have personal knowledge of the facts set forth herein.
3. I make this declaration in support of Plaintiff Chung Ting Yu's Motion for Default Judgment against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Schedule "A" (collectively "Defaulting Defendants").
4. If called upon to do so, I could and would competently testify to the following facts set forth below.
5. I am a licensed attorney and admitted to practice before the Northern District of Illinois.
6. Plaintiff filed its Complaint in the instant civil action on December 10, 2024 alleging trademark infringement and counterfeiting (15 U.S.C. § 1114) [Doc. 1 at ¶¶ 38-50], false

designation of origin (15 U.S.C. § 1125(a)) [*Id.* at ¶¶ 51-54], violation of the Illinois Uniform Deceptive Trade Practices Act. (815 ILCS § 510, et. seq.) [*Id.* at ¶¶ 55-58].

7. On March 27, 2025, in order to facilitate the investigation of its claims and the identity and location of Defendants, Plaintiff moved for alternate service and expedited third party discovery (“Plaintiff’s Motions” hereinafter). [D.E. 15 and 16, respectively]. On April 1, 2025, this Court granted Plaintiff’s Motions, permitting Plaintiff to serve the Summonses, Complaint, and filings in this matter upon Defendants via electronic mail (“e-mail”) and via Plaintiff’s designated serving notice website by posting copies of the same on an Internet website. [Doc. 19].

8. On April 21, 2025, Defaulting Defendants were properly served with the Summons and Complaint. [Doc. 23].

9. The time allowed for Defaulting Defendants to respond to the Complaint has expired.

10. To date, Defaulting Defendants as identified on the Schedule A of the proposed order have not filed any responsive pleadings to the Complaint, or one which has been stricken by this Court, and have not filed a motion requesting an extension of time to respond to the Complaint, nor have Defaulting Defendants entered a formal appearance *pro se* or by counsel on their behalf.

11. I am informed and believe that none of the Defaulting Defendants are infants or incompetent persons, and, upon information and belief, the Servicemembers Civil Relief Act does not apply.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief at the time of presentation.

Executed on this 16th of May, 2025 at Fort Pierce, Florida.

/s/ Lydia Pittaway
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