

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

Collectanea J. Limited,)	
)	Case: 25-cv-04839
)	
Plaintiff,)	Judge: Charles P. Kocoras
)	
v.)	Mag. Judge: Maria Valdez
)	
The Partnerships And)	
Unincorporated Associations)	
Identified On Schedule "A")	
)	
Defendants.)	
<hr style="width: 30%; margin-left: 0;"/>)	

**MOTION FOR ENTRY OF DEFAULT AND FINAL JUDGMENT PURSUANT TO
FED.R.CIV.P. 55(a) AND 55(b)**

Plaintiff Yiwu Baimei Electronic Commerce Co., Ltd. ("Baimei" or "Plaintiff") by and through its undersigned counsel, moves this Honorable Court to enter Default Judgment pursuant to Fed.R.Civ.P. 55(a) and 55(b) against Defendants ("Defaulting Defendants" hereinafter) identified on the Amended Schedule A consistent with the proposed order submitted herewith (D.E. 8). In support of this Motion, Plaintiff submits the following Memorandum of Law.

Procedural History

1. On May 22, 2025, Plaintiff filed its Amended Complaint ("Complaint" hereinafter) alleging violations of 15 USC § 1114 (trademark infringement and counterfeiting), 15 USC § 1125 (false designation) trademark and 17 U.S.C. § 101 et. seq. (copyright infringement). [Doc. 7].

2. On May 28, 2025, Plaintiff filed its Motion for Expedited Third Party Discovery, Motion for Alternate Service, and Motion for Temporary Restraining Order, which this Court subsequently granted. [Doc. 12, 13, 14, and 17, respectively].

3. On June 18, 2025, Plaintiff filed its Motion for Preliminary Injunction. [Doc. 26]. On June 27, 2025, without objection, this Court granted Plaintiff's Motion for Preliminary Injunction. [Doc. 40].

4. On June 18, and June 22, 2025, Plaintiff filed its Return of Summons as to these Defaulting Defendants. [Doc. 29-33, 42].

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

6. To one exception, the Defaulting Defendants have not entered an appearance or otherwise defended this action. *See* attached Exhibit One, Declaration of Lydia Pittaway at ¶14, (hereinafter, "the Pittaway Declaration"). The exception would be Def. (No. 247) Sun Biomass, which has entered an ambiguous "Notice of Inactivity, Lack of Legal Counsel, and Request for Consideration" for the Defendant company. (D.E. 46). Plaintiff's Motion to Strike this filing is pending before this Court. (D.E. 54).

7. Plaintiff is informed and believes that the Defaulting Defendants are not considered infants or incompetent persons. *Id.*

8. Plaintiff is informed and believes that the Service Members Civil Relief Act does not apply. *Id.*

9. Plaintiff respectfully requests that an entry of default under Fed.R.Civ.P. 55(a) be entered. In addition, Plaintiff respectfully requests for entry of a final judgment under Fed.R.Civ.P. 55(b), including an award of statutory damages as authorized by 15 U.S.C. §1114

and 17 U.S.C. § 504, and a permanent injunction enjoining the Defaulting Defendants from further acts of trademark and copyright infringement.

WHEREFORE, Plaintiff respectfully requests for this Court to enter default and final judgment against the storefronts identified on the proposed order herewith.

Respectfully Submitted this 23rd of July, 2025,

Lydia Pittaway

Fla. Bar No.: 0044790

Ford Banister LLC

305 Broadway - Floor 7

New York NY 10007

Telephone: +1 212-500-3268

lpittaway@fordbanister.com