

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

Yiwu Baimei Electronic Commerce Co., Ltd., a Chinese Limited Corporation	)	
	)	Case: 24-cv-09301
Plaintiff,	)	Judge: Franklin U. Valderrama
	)	
v.	)	Mag. Judge: Jeffrey T. Gilbert
	)	
The Partnerships And	)	
Unincorporated Associations	)	
Identified On Schedule "A"	)	
	)	
Defendants.	)	

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**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 Yiwu Baimei'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 October 2, 2024 alleging copyright infringement (17 U.S.C. §101 et seq.). [D.E. 1 at ¶¶ 45-59].

7. On July 7, 2025, in order to facilitate the investigation of its claims and the identity and location of Defendants, Plaintiff moved for alternate service [D.E. 36]. The motion was granted [D.E. 38], permitting Plaintiff to serve the Summons, 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.

8. On August 6, 2025, Defaulting Defendants were served with the Summons and Complaint. [Doc. 41].

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

10. To date, Defaulting Defendants have not filed any responsive pleadings to the Complaint, have not filed a motion requesting an enlargement 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 neither 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 5th of September, 2025 at Fort Pierce, Florida.

/s/ Lydia Pittaway  
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