

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

Collectanea J. Limited,)	
a Hong Kong Limited Corporation)	Case: 25-cv-9113
)	
Plaintiff,)	Judge: Edmond E. Chang
)	
v.)	Mag. Judge: Daniel P. McLaughlin
)	
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 Collectanea J. Limited's Motion for Default Judgment against Defendants, The Partnerships And Unincorporated Associations Identified On Schedule "A" (collectively the "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 August 1, 2025 in order to combat online e-commerce operators who trade upon Plaintiff's reputation and goodwill by selling and/or offering for sale products in connection with Plaintiff's federally registered copyright, VA 2-348-115 (the "Beadnova Works" hereinafter). [D.E. 1 at ¶¶ 5-6].

7. On August 11, 2025, in order to facilitate the investigation of its claims and the identity and location of Defendants, Plaintiff moved for alternate service [D.E. 11]. The motion was granted [D.E. 16], 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 11, 2025, Plaintiff filed its motion for entry of an *ex parte* temporary restraining order, including a temporary injunction, a temporary asset restraint [D.E. 12] and a motion for expedited discovery [D.E. 10] which were granted by the Court [D.E. 16]. On August 21, 2025, Plaintiff filed its *Ex Parte* Application to Extend Temporary Restraining Order. [D.E. 21]. On August 25, 2025, this Court granted Plaintiff's motion for extension of a temporary restraining order. [D.E. 23].

9. On September 5, 2025, Plaintiff filed its Motion for Preliminary Injunction. [D.E. 26]. On September 8, 2025, this Court granted Plaintiff's Motion for Preliminary Injunction [D.E. 30].

10. The Temporary Restraining Order and Preliminary Injunction required, *inter alia*, third-party payment processors including, but not limited to Amazon, PayPal, Inc. ("PayPal"), Amazon Pay, LianLian Global, LL Pay U.S., and Lianlian Yingtong Electronic Payment Co. Ltd. ("LianLian"), Stripe, and Pingpong, and their related companies and affiliates, to identify and restrain all funds in Defaulting Defendants' associated payment accounts, including all related

financial accounts tied to, used by, or that transmit funds into, the respective Defaulting Defendants' financial accounts, and divert those funds to a holding account for the trust of the Court. Subsequently, my firm received notice from the third-party processors that it complied with the requirements of the Court's Orders.

11. Defaulting Defendants were served with the Summons and Complaint on September 5, 2025. [D.E. 27].

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

13. 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 Amended Complaint. Defaulting Defendants have not filed a formal appearance pro se or by counsel on their behalf.

14. 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 3rd day of October, 2025 at Fort Pierce, Florida.

/s/ Lydia Pittaway
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