

**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.	)	
	)	

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

Plaintiff Collectanea J. Limited Ltd. (“Collectanea” or “Plaintiff”) by and through its counsel, Ford Banister LLC, moves this Honorable Court to enter Default Judgment pursuant to Fed.R.Civ.P. 55(a) and 55(b) against Defendants (No. 1) Hoccus and (No. 2) Lanlos (“Defaulting Defendant” hereinafter) identified on Schedule A. In support of this Motion, Plaintiff submits the following Memorandum of Law.

**Procedural History**

1. On August 1, 2025, Plaintiff filed its Complaint (“Complaint” hereinafter) 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].

2. On August 11, 2025, Plaintiff filed its Motion for Expedited Third Party Discovery, Motion for Electronic Service of Process, and Motion for Temporary Restraining Order, which this Court subsequently granted. [D.E. 10, 11, 12, and 16 respectively].

3. On September 5, 2025, Plaintiff filed its Return of Summons as to these Defaulting Defendants. [D.E. 27].

4. On September 5, 2025, Plaintiff filed its Motion for Preliminary Injunction. [D.E. 25]. On September 8, 2025, without objection, this Court granted Plaintiff's Motion for Preliminary Injunction. [D.E. 30].

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

6. The Defaulting Defendants have not entered an appearance or otherwise defended this action. *See* attached Exhibit One, Declaration of Lydia Pittaway at ¶13, (hereinafter, "the Pittaway Declaration").

7. Plaintiff is informed and believes that the Defaulting Defendants are not considered infants or incompetent persons. *Id.* at ¶14.

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 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 3rd day of October, 2025,

*Lydia Pittaway*

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