

**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-02319
)	
Plaintiff,)	Judge: Franklin U. Valderrama
)	
v.)	Mag. Judge: Sunil R. Harjani
)	
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 Yiwu Baimei Electronic Commerce Co., Ltd.'s Motion for Default Judgment against Defendants, The Partnerships 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 March 21, 2024 alleging trademark infringement and counterfeiting (15 U.S.C. § 1114), false designation of origin (15

U.S.C. § 1125(a)), violation of the Illinois Uniform Deceptive Trade Practices Act. (815 ILCS § 510, et. seq.) and copyright infringement (17 U.S.C. §101 et seq.) [Doc. 1 at ¶¶ 53-62; ¶¶ 63-66, ¶¶ 67-70; ¶¶ 71-85, respectively].

7. On March 25, 2024, Plaintiff filed a motion for entry of an ex parte temporary restraining order, including a temporary injunction, a temporary asset restraint enjoining the display, distribution, offering for sale, and use of the Mark and the Long Tail Cat Image. [Doc. 13]. Plaintiff contemporaneously filed a Motion for Electronic Service of Process and Motion for Expedited Third Party Discovery. [Docs. 11, 12]. On April 1, 2024, the Motions were granted by the Court. [Doc. 16].

8. Defaulting Defendants were properly served with the Summons and Complaint. [Docs. 26-32].

9. Each of the Defaulting Defendants requested and received an extension to respond to the Complaint. Specifically:

- Defendant (No. 217) Shenzhen Mingzhiyang Technology Co., Ltd. requested an extension to respond to the Complaint, and while the corresponding Minute Order did not specify this Defendant by name, otherwise provided an extension of time through June 14, 2024 for other Defendants in this Defendant group to respond to the Complaint. (Docs. 62, 67). To date, this store has not responded to the Complaint.
- Defendant (No. 220) Shenzhenhanshikejiyouxiangongsi¹ requested and received an extension through June 14, 2024 to respond to the Complaint. (Docs, 62, 67). To date, this Defendant has not responded to the Complaint.

¹ Defendant (No. 220) identified on the Schedule A as “Shenzhenhanshikejiyouxiangongsi” is referred to as “s h e n z h e n h a n s h i k e j i y o u x i a n g o n g s i” in Defendant’s filing. [Doc. 67].

- Defendant (No. 291) Yu Mei Department requested and received an extension through June 14, 2024 to respond to the Complaint. (Docs. 62, 67). To date, this Defendant has not responded to the Complaint.

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 Complaint, nor have Defaulting Defendants entered 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 7th of September, 2025 at Fort Pierce, Florida.

/s/ Lydia Pittaway
Bar No. 0044790
Ford Banister LLC
305 Broadway - Floor 7
New York, NY 10007
Telephone: 212-500-3268
Email: lpittaway@fordbanister.com
Attorney for Plaintiff