

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

COLLECTANEA J. LIMITED,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A,"

Defendants.

Case No. 25-cv-10975

Judge Mary M. Rowland

Magistrate Judge Laura K. McNally

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF
DEFAULT PURSUANT TO FED. R. CIV. P. 55(a) AND MOTION FOR FINAL
JUDGMENT PURSUANT TO FED. R. CIV. P. 55(b) AS TO CERTAIN DEFENDANTS**

Plaintiff Yiwu Baimei Electronic Commerce Co., Ltd. ("Baimei" or "Plaintiff") by and through its undersigned counsel, seeks entry of default and default judgment as to Certain Defendants.

Procedural History

1. On September 11, 2025, Plaintiff filed its Complaint ("Complaint" hereinafter) alleging violations of 15 U.S.C. § 1114 (trademark infringement and counterfeiting) and 15 U.S.C. § 1125 (false designation of origin). [Doc. 1].
2. On September 24, 2025, Plaintiff filed its Motion for Motion for Alternate Service, Expedited Third Party Discovery, and Motion for Temporary Restraining Order, which this Court subsequently granted. [Doc. 13, 14, 15, and 16, respectively].
3. On October 3, 2025, Plaintiff moved to extend the TRO. [Doc. 19]. This Court granted Plaintiff's Motion on October 6, 2025. [Doc. 20].

4. On October 27, 2025, Plaintiff filed its Motion for Preliminary Injunction. [Doc. 24]. On November 25, 2025, this Court granted Plaintiff's Motion for Preliminary Injunction. [Doc. 62].

5. On October 29, 2025, Plaintiff filed its Return of Summons as to Defaulting Defendants. [Doc. 29].

6. On November 10, 2025, Defendant No. 8 Find-it-Fast appeared in the case. [Doc. 33]. Defendant No. 8 filed an Answer on November 19, 2025 [Doc. 41], and is excluded from this Motion.

7. On November 19, 2025, an individual identifying themselves as Syed Mustafa Ali Kazmi appeared pro se on behalf of "Kazmi Ecommerce." [Doc. 48] Kazmi Ecommerce is not a named defendant in this case. Plaintiff has been unable to link this individual to any named defendant in this case and has had no contact with the filer. Out of an abundance of caution, Plaintiff will serve the instant motion on the email address provided by the filer in the pro se appearance form. [Id.]

8. The time allowed for the Defaulting Defendants to respond to the Complaint has expired. See Declaration of Larry Ford Banister, II (hereinafter "Banister Dec.") at ¶12.

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

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

11. Plaintiff respectfully requests that an entry of default under Fed. R. Civ. P. 55(a) be entered, as well as an order of final judgment under Fed. R. Civ. P. 55(b). Plaintiff respectfully requests the entry of a final judgment under Fed. R. Civ. P. 55(b) to include 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 infringement.

MEMORANDUM OF LAW

This memorandum will discuss why Plaintiff has demonstrated that entry of default and final judgment is proper as to Certain Defendants. Next, this memorandum will discuss why a high statutory damages award is appropriate. In support of this argument, Plaintiff will explore why Congress intended on statutory damages as an alternative to actual damages in a case such as this, where Plaintiff created a marketing series with hundreds of images associated with its trademark brand and defendants' infringement has resulted in indeterminable damage to Plaintiff from loss of sales, loss of consumer base, and damage to the brand's goodwill. Plaintiff will also reference the statutory awards it has received from other courts in this district, where a finding of willfulness and injury has been found. This memorandum will conclude that a high statutory damages award is appropriate under the circumstances of this case.

I. JURISDICTION AND VENUE ARE PROPER IN THIS COURT

This Court has original subject matter jurisdiction over the claims in this action pursuant to 28 U.S.C. § 1331, 28 U.S.C. § 1338(a)-(b), and provision 15 U.S.C. § 1121 of the Lanham Act. [Doc. 1 at ¶1]. Venue is proper in this Court under 28 U.S.C. § 1391. *Id.* at ¶3. This Court may properly exercise personal jurisdiction over Defendants since each of the Defendants directly targets business activities toward consumers in the United States, including Illinois, through at least the fully interactive, commercial Internet stores operating under the Defaulting Defendants [Doc. 1 at ¶¶2-4 and Doc. 10 at ¶¶21-24]. *uBID, Inc. v. GoDaddy Grp., Inc.*, 623 F.3d 421, 423-24 (7th Cir. 2010) (without the benefit of an evidentiary hearing, the plaintiff bears only

the burden of making a prima facie case for personal jurisdiction; all of plaintiff's asserted facts should be accepted as true and any factual determinations should be resolved in its favor).

Through the fully interactive commercial Defendants' Internet Stores, Illinois residents can purchase products from Defaulting Defendants that are sold and advertised in listings for sale utilizing Plaintiff's registered trademark without authorization. *See NBA Properties, Inc. v. HANWJH*, 46 F.4th 614 at 624-625, 2022 WL 3367823 at *7 (7th Cir. Aug. 16, 2022) (“[Defendant's] actions certainly can be characterized as purposeful. It established an online store, using a third-party retailer, Walmart.com. Through this online store, it unequivocally asserted a willingness to ship goods to Illinois and established the capacity to do so. When an order was placed, it filled the order, intentionally shipping an infringing product to the customer's designated Illinois address.”). Therefore, personal jurisdiction is proper because each of the Defendants is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois. [Doc. 1 at ¶¶2-4, 52-56 and Doc. 10 at ¶¶21-24].

II. PLAINTIFF MEETS THE REQUIREMENTS FOR FED. R. CIV. P. 55(a) ENTRY OF DEFAULT

The Return of Summons reflects that Plaintiff served Defendants on October 29, 2025. [Doc. 29]. Therefore, the twenty-one days for Defendants to respond to the Complaint, on November 19, 2025, has passed. *See* Banister Dec. at ¶12. The Defaulting Defendants have failed to answer or otherwise respond to the Complaint, and failed to file a copy of an Answer or other response with the Court. *Id.* at ¶13.

III. PLAINTIFF MEETS THE REQUIREMENTS FOR FED. R. CIV. P. 55(b) ENTRY OF FINAL DEFAULT JUDGMENT

Rule 55(b)(2) of the Federal Rules of Civil Procedure provides for a court-ordered default

judgment. A default judgment establishes, as a matter of law, that defendants are liable to Plaintiff on each cause of action alleged in the Complaint. *United States v. Di Mucci*, 879 F.2d 1488, 1497 (7th Cir. 1989). When the Court determines that a defendant is in default, the factual allegations of a complaint are taken as true and may not be challenged, and the defendants are liable as a matter of law as to each cause of action alleged in the complaint. *Black v. Lane*, 22 F.3d 1395, 1399 (7th Cir. 1994).

A. Entry of Default Judgment is Appropriate.

1. Plaintiff Has Properly Pled a Claim for Trademark Infringement and Counterfeiting

To properly plead a claim of trademark infringement and counterfeiting pursuant to the Lanham Act, a plaintiff must allege that (1) its mark is distinctive enough to be worthy of protection, (2) defendants are not authorized to use the mark; and (3) defendants' use of the mark causes a likelihood of confusion as to the origin or sponsorship of defendants' products. *Neopost Industrie B.V. v. PFE Int'l Inc.*, 403 F. Supp. 2d 669, 684 (N.D. Ill. 2005) (citing *Bliss Salon Day Spa v. Bliss World LLC*, 268 F.3d 494, 496-97 (7th Cir. 2001)).

Plaintiff alleged in its Complaint that it owns the trademark covered by U.S. Trademark Registration No. VA 4663487 (hereinafter, the "Beadnova Trademark") [Doc. 1 at ¶6, Doc. 10 at ¶3], that the registered Beadnova Trademark is distinctive [Doc. 10 at ¶18], that Defaulting Defendants have knowledge of Plaintiff's rights in the registered trademark, *Id.* at ¶¶25-31 that Defaulting Defendants are not authorized to use the registered Trademark [Doc. 1 at ¶¶29, 39, 52, 55; Doc. 10 at ¶¶23-24] and that Defaulting Defendants' use of the registered Trademark causes a likelihood of confusion. [Doc. 1 at ¶¶53, 63, 69]. Defaulting Defendants' failure to respond or otherwise plead in this matter requires the Court to accept the allegations of Plaintiff's

Complaint as true. Fed. R. Civ. P. 8(b)(6); *Am. Taxi Dispatch, Inc., v. Am. Metro Taxi & Limo Co.*, 582 F. Supp. 2d 999, 1004 (N.D. Ill. 2008)). Accordingly, Plaintiff is entitled to entry of judgment in its favor with respect to Count I for willful infringement and counterfeiting of its registered trademark against the Defaulting Defendants.

2. Plaintiff Has Properly Pled a Claim For False Designation of Origin

In order to establish liability for false designation of origin under 15 U.S.C. § 1125(a), Plaintiff must show that: (1) the registered mark is a protectable trademark; and (2) a likelihood of confusion will exist as to the origin of Plaintiff's products. *Johnny Blastoff, Inc. v. Los Angeles Rams Football Co.*, 188 F.3d 427, 436 (7th Cir. 1999)) (citing *International Kennel Club of Chicago, Inc. v. Mighty Star, Inc.*, 846 F.2d 1079, 1084 (7th Cir. 1988)). This is the same test that is used for bringing a trademark infringement claim under the Lanham Act. *Id.* Plaintiff properly pled a claim for false designation of origin in the Complaint. [Doc. 1 at ¶¶68-72]. Therefore, Plaintiff is entitled to entry of judgment in its favor with respect to Count II for false designation of origin of its registered trademark against the Defaulting Defendants.

3. Plaintiff Is Entitled to an Award of Statutory Damages

Section 1117(c)(2) to chapter 15 of the United States Code provides that a plaintiff may be awarded statutory damages of \$2,000,000.00 for willful trademark counterfeiting for each and every use of a mark. Courts interpreting 15 U.S.C. § 1117(c) have analogized case law applying the statutory damages provision contained in the Copyright Act, 17 U.S.C. § 504(c). *Lorillard Tobacco Co. v. S & M Cent. Service Corp.*, 2004 WL 2534378 at *4 (N.D. Ill. 2004); *Luxottica USA LLC v. The Partnerships*, 2015 WL 3818622 at *2 (N.D. Ill. June 18, 2015).

“District courts enjoy wide discretion in awarding fees and may consider various factors such as “the difficulty or impossibility of proving actual damages, the circumstances of the

infringement, and the efficacy of the damages as a deterrent to future copyright infringement.” *Chi-Boy Music v. Charlie Club*, 930 F.2d 1224, 1229 (7th Cir. 1991) (citations omitted) “Statutory damages are ‘most appropriate’ when an infringer’s nondisclosure makes actual damages uncertain.” *Luxottica USA LLC v. The Partnerships*, 2015 WL 3818622 at *2 (N.D. Ill. June 18, 2015) (citing *Sara Lee Corp. v. Bags of N.Y., Inc.*, 36 F.Supp.2d 161, 165 (S.D.N.Y. 1999)). Here, none of the Defaulting Defendants have appeared and/or provided Plaintiff with information from which Plaintiff might determine Defendants’ sales and an award of statutory damages is appropriate.

In similar cases of online counterfeiting, courts have awarded statutory damages, including up to the maximum provided by statute, to plaintiffs in order to deter defendants from bringing counterfeit goods into commerce, compensate plaintiffs for damages caused by the defendants’ infringement, and punish defendants appropriately for their counterfeiting activities. *See, e.g., Luke Combs v. The Partnerships, et al.*, Case No. 21-cv-02007 (N.D. Ill. June 15, 2021) (Shah, J.) [Doc. 39-40] (awarding \$100,000 in statutory damages per defaulting defendant); *Volkswagen Group of America v. CAR FAN, et al.*, Case No. 22-cv-00863 (N.D. Ill. May 27, 2022) (Pacold, J.) [Doc. 56] (awarding \$500,000 in statutory damages per defaulting defendant); *Collectanea J. Limited v. The Partnerships and Unincorporated Associations Identified on Schedule A*, Case No. 25-cv-04839 (N.D. Ill. Oct. 10, 2025) (Kocoras, J.) [Doc 124] (awarding statutory damages of \$1,000,000 per defaulting defendant); Case No. 24-cv-05462 (N.D. Ill. Sept. 18, 2024) (Harjani, J.) (awarding statutory damages of \$1,000,000 per defaulting defendant); *Sega Corporation and Sega of America, Inc., v. Bengbu Lucky Gifts Co., Ltd., et al.*, Case No. 23-cv-16654 (N.D. Ill. 2024) (Rowland, J.) [Doc. 57] (awarding \$50,000 in statutory damages per defaulting defendant); *Anagram International, LLC v. The Individuals*,

Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A Hereto, Case No. 25-cv-08603 (N.D. Ill. Apr. 10, 2024) (Rowland, J.) [Doc. 57] (awarding \$100,000 in statutory damages per defaulting defendant).

To date, Plaintiff has also received judgments in several other lawsuits where under similar circumstances, the District Court found that Defendants willfully infringed Plaintiff's registered intellectual property and that the infringement caused Plaintiff injury to support an award of statutory damages. *See Collectanea J. Limited v. The Partnerships and Unincorporated Associations Identified on Schedule A*; Case No. 24-cv-3821 (N.D. Ill. Nov. 8, 2024) (Ellis, J.) [Doc. 131] (awarding statutory damages of \$15,000 for willful infringement against each defaulting defendant); Case No. 24-cv-5184 (N.D. Ill. Sept. 18, 2024) (Harjani, J.) [Doc. 32] (awarding statutory damages of \$50,000 for willful trademark and copyright infringement against each defaulting defendant); Case No. 24-cv-4731 (N.D. Ill. Dec. 3, 2024) (Alonso, J.) [Doc. 47] (awarding statutory damages of \$150,000 for willful infringement against each defaulting defendant); Case No. 24-cv-5610 (N.D. Ill. Sept. 16, 2025) (Jenkins, J.) [Doc. 49] (awarding statutory damages of \$50,000 for willful infringement against each defaulting defendant), Case No. 24-cv-6472 (N.D. Ill. Feb. 21, 2025) (Daniel, J.) [Doc. 85] (awarding statutory damages of \$75,000 for willful copyright infringement and \$75,000 for willful trademark infringement against each defaulting defendant); Case No. 25-cv-04839 (N.D. Ill. Oct. 10, 2025) (Kocoras, J.) [Doc. 124] (awarding statutory damages of \$1,000,000 per defaulting defendant); Case No. 25-cv-09113 (N.D. Ill. Oct. 9, 2025) (Chang, J.) [Doc. 36] (awarding statutory damages of \$15,000 for willful copyright infringement against each defaulting defendant).

The volume of infringers, in this case as well as the preceding cases, underscores the prevalence of the infringement on Plaintiff's registered trademark and other intellectual property. Creating this form of content for any brand is a massive undertaking. The time, energy, and resources Plaintiff expends to police its registered property distracts from Plaintiff's ability to focus on marketing, development, content creation, and product enhancement for its branded products. This dichotomy, of having to allocate resources to manage infringement rather than simply to manage its products, is exactly why Congress provides for the relief of infringement in the form of statutory awards. If Plaintiff only received actual damages, Plaintiff may not recover the time, resources, and costs that it invests into policing its property.

For Plaintiff, seeing the (collectively) thousands of infringers simply taking the trademark and then using the trademark on their storefronts takes away from Plaintiff's efforts to build consistent marketing and to make content associated with its brand. Any customers looking for Beadnova and its associated quality control, customer service, and warranties must either sift through hundreds or thousands of infringer storefronts before being able to find Plaintiff's storefront, or risk buying counterfeit products from an infringer. Given that loss of goodwill and brand confidence is incalculable, high statutory damages should be awarded.

5. Defendants' Acts of Infringement Were Willful

"Willful infringement may be attributed to the defendant's actions where he had knowledge that his conduct constituted infringement or where he showed a reckless disregard for the owner's rights." *Lorillard Tobacco Co.*, 2004 WL 2534378 at *7. It is not necessary that knowledge be proven directly, it may be inferred from a defendant's conduct. *Id.* As alleged in Plaintiff's Complaint, the Defaulting Defendants facilitate sales by utilizing the Beadnova Mark, including the watermark image, to give the impression that the Defendant is associated with or

authorized by Plaintiff. [Doc. 1 at ¶44].¹ As such, Defaulting Defendants clearly had knowledge their activities constituted infringement or at least demonstrated reckless disregard for Plaintiff's rights in the Beadnova Trademark.

In addition, Plaintiff alleged in its Complaint that “Defendants have engaged in fraudulent conduct when registering the Defendant Internet Stores by providing false, misleading and/or incomplete information to Internet based e-commerce platforms.” *Id.* at ¶34. Pursuant to 15 U.S.C. § 1117(e), this creates a rebuttable presumption of willfulness. *Int'l Typeface Corp. v. Shellabarger*, No. 06-CV-0260 (HLM), 2008 WL 11333693, at *8 (N.D. Ga. June 30, 2008) (applying the presumption where the defendant “provid[ed] false contact information to his domain name registrar, . . . ma[king] himself inaccessible to . . . [the plaintiffs'] efforts to notify him of trademark infringement”).

District courts in the Northern District of Illinois have routinely found infringement willful in cases involving this Plaintiff, and other trademark infringement cases. *See Collectanea J. Limited v. The Partnerships and Unincorporated Associations Identified on Schedule A*; Case No. 24-cv-05184 (N.D. Ill. Sept. 18, 2024) (Harjani, J.) [Doc. 32] (awarding statutory damages of \$50,000 for willful trademark infringement against each defaulting defendant); 25-cv-04839 (N.D. Ill. Oct. 10, 2025) (Kocoras, J.) [Doc. 47] (awarding statutory damages of \$1,000,000 for willful trademark infringement against each defaulting defendant); *Sega Corporation and Sega of America, Inc., v. Bengbu Lucky Gifts Co., Ltd., et al.*, Case No. 23-cv-16654 (N.D. Ill. 2024) (Rowland, J.) [Doc. 57] (awarding statutory damages of \$50,000 for willful trademark infringement against each defaulting defendant).

6. Plaintiff's Ongoing Investment in Marketing and Promotion and Brand Protection Efforts Justify a High Statutory Damages Award

¹ See Exhibit Three (Evidence) to the Declaration of Yu Chung Ting [Doc. 10]; [Doc. 11] pp. 13, 53, 62, 94, 104, 122, 126, 144, 158, 161, 169, 185, 199.

Courts may also take into account the value of a plaintiff's brand and the efforts taken to protect, promote, and enhance that brand. *Lorillard Tobacco Co.*, 2004 WL 2534378, at *9-10. The commercial success achieved through utilization of the registered trademark has resulted in significant infringement by individuals and entities who unlawfully use the Beadnova Mark using Plaintiff's goodwill. Plaintiff has had to expend significant resources in policing its registered trademark. [Doc. 10 ¶¶ 20-24].

7. A High Statutory Damages Award is Justified Due to the Acts of Infringement Having Taken Place on the Internet

Many Courts, in this district and elsewhere, have awarded high damages where the predicate acts of infringement took place on the internet. *See Monster Energy Company v. Jing, et al.*, Case No. 2015-cv-00277, 2015 WL 4081288, at * 7 (N.D. Ill. July 6, 2015); *Luxottica Group S.p.A. v. Hao Li, et al.*, Case No. 16-cv-00487, 2017 WL 621966 at *16 (N.D. Ill. Feb. 15, 2017) (“But even putting aside any evidence of defendant selling multiple products through multiple online sales platforms, defendant can reach a worldwide customer base on eBay alone.”); *Coach, Inc. v. Ocean Point Gifts*, Case No. 09-4215 (JBS), 2010 WL 2521444, at *14-15 (D.N.J. Jun. 14, 2010) (finding high damage awards in counterfeit cases were “due in part to the wide market exposure that the Internet can provide”).

In addition to the fact that the internet permits wide market exposure, as Plaintiff set out in its Complaint, third party service providers like those used by Defendants do not adequately subject new sellers to verification and confirmation of their identities, allowing Defendant Internet Stores to routinely use false or inaccurate names and addresses when registering with these e-commerce platforms. [Doc. 10 at ¶¶27-29]. This point is underscored here where Plaintiff, a moderately sized retailer, is attempting to establish its brand and secure market share

amidst the constant overseas infringers doing business on the same platform. The audacity of infringers in attempting to deceive courts as to their identity and avoid liability has also been demonstrated in this judicial district. *See Camelbak Products LLC v. The Partnerships and Unincorporated Associations Identified On "Schedule A"*, 1:20-cv-01544 (N.D. Ill. January 5, 2021) (Doc. 105 at 3).

Without sufficient deterrence, Plaintiff will not be able to regain control over the unbridled infringement and damage to its goodwill.

8. The Award of Statutory Damages Should be Sufficient to Compensate Plaintiff and to Deter Further Acts of Infringement

When the infringement is willful, the statutory damages award may be designed to penalize the infringer and to deter future violations. *See Illinois Bell Tel. Co. v. Haines & Co.*, 905 F.2d 1081, 1089 (7th Cir. 1990); *Bulgari, S. P.A. v. Xiaohong*, Case No. 15-cv-05148, 2015 WL 6083202 at *5 (N.D. Ill., October 15, 2015) (Coleman, J.) (“This Court's award, moreover, must be adequate to deter future infringement, intentional or unintentional, by the defendant and others similarly situated.”). A high statutory damages award will serve to both compensate Plaintiff and to deter the Defaulting Defendants and others who are either now or may in the future infringe upon the registered mark.

9. Plaintiff Is Entitled to a Permanent Injunction Preventing Further Acts Of Infringement of Its Registered Mark

In addition to the foregoing relief, Plaintiff respectfully requests entry of a permanent injunction enjoining Defaulting Defendants from infringing or otherwise violating Plaintiff's registered trademark, including at least all injunctive relief previously awarded by this Court to Plaintiff in the TRO and Preliminary Injunction. “Without a permanent injunction, the defendants will likely continue their infringing conduct...” *Kinsey v. Jambow, Ltd.*, 76 F. Supp. 3d 708, 714

(N.D. Ill. 2014). Further, prevention of additional acts of infringement of Plaintiff's registered Beadnova Mark and serves the public interest. *See Miyano Mach., USA, Inc. v. MiyanoHitec Mach, Inc.*, 576 F. Supp. 2d 868, 889 (N.D. Ill. 2008) ("The public interest is generally served by the enforcement of trademark laws as such laws prevent confusion among and deception of consumers ...") (citation omitted). This Court and others in this judicial district routinely grant permanent injunctive relief to prevailing plaintiffs in trademark infringement cases. *See Collectanea J. Limited v. The Partnerships and Unincorporated Associations Identified on Schedule A*; Case No. 24-cv-5184 (N.D. Ill. Dec. 5, 2024) (Harjani, J.) [Doc. 32]; 25-cv-04839 (N.D. Ill. Oct. 10, 2025) (Kocoras, J.) [Doc. 47]; *Sega Corporation and Sega of America, Inc., v. Bengbu Lucky Gifts Co., Ltd., et al.*, Case No. 23-cv-16654 (N.D. Ill. 2024) (Rowland, J.) [Doc. 57].

10. The Court Should Authorize Immediate Execution Upon this Final Judgment Order

In the extended TRO, [Doc. 17] in order to avoid the fraudulent transfer of assets beyond the jurisdiction of the Court, the Court prohibited Defaulting Defendants and third parties in possession of their assets from transferring funds. In addition to the immediate transfer of assets of the funds now restrained in Defendants' financial accounts and continued leave to serve Defaulting Defendants and third parties, including but not limited to DHGate, eBay, Newegg and Walmart, with this order via email, relief commonly afforded to plaintiffs in similar cases. *See, e.g., Collectanea J. Limited v. The Partnerships and Unincorporated Associations Identified on Schedule A*; Case No. 24-cv-5184 (N.D. Ill. Dec. 5, 2024) (Harjani, J.) [Doc. 32]; 25-cv-04839 (N.D. Ill. Oct. 10, 2025) (Kocoras, J.) [Doc. 47]; *Sega Corporation and Sega of America, Inc., v. Bengbu Lucky Gifts Co., Ltd., et al.*, Case No. 23-cv-16654 (N.D. Ill. 2024) (Rowland, J.) [Doc. 57]. To the extent that it may be necessary for Plaintiff to utilize state law collections devices,

Plaintiff respectfully requests that the Court dissolve the stay on execution contained in and as authorized by Fed. R. Civ. P. 62(a). *See* Fed. R. Civ. P. 62, Advisory Committee's Notes (2018) ("Amended Rule 62(a) expressly recognizes the court's authority to dissolve the automatic stay... One reason for dissolving the automatic stay may be a risk that the judgment debtor's assets will be dissipated.").

III. CONCLUSION

WHEREFORE, Plaintiff requests that this Court enter default pursuant to Fed. R. Civ. P. 55(a) and final judgment pursuant to Fed. R. Civ. P. 55(b) against Defaulting Defendants as identified on the Schedule A to the proposed order. Plaintiff respectfully requests that the Court enter default judgment against each Defaulting Defendant for statutory damages in the amount of \$2,000,000 for counterfeiting and a permanent injunction order prohibiting Defaulting Defendants from using Plaintiff's federally registered Beadnova trademark without authorization.

Respectfully submitted this 10th of December, 2025.

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