

**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

**DECLARATION OF LARRY FORD BANISTER, II IN SUPPORT OF
PLAINTIFF'S MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT**

I, Larry Ford Banister, II, 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 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 September 11, 2025 alleging trademark infringement (15 U.S.C. §1114), false designation of origin (15 U.S.C. § 1125(a)). [D.E. 1 at ¶¶ 57-72].

7. On September 24, 2025, in order to facilitate the investigation of its claims and the identity and location of Defendants, Plaintiff moved for expedited discovery [Doc. 14]. The motion was granted [Doc. 16], permitting Plaintiff to serve discovery on Defendants and third party platforms including but not limited to Walmart, Payoneer, Paypal, Stripe, Pingpong, and LianLian Global, LL Pay U.S., LLC, and Lianlian Yintong Electronic Payment Co. Ltd. (“LianLian”).

8. On September 24, 2025, Plaintiff filed its Motion for Entry of an ex parte Temporary Restraining Order, Including a Temporary Injunction, and a Temporary Asset Restraint [Doc. 15], and Motion for Expedited Discovery [Doc. 13], which were granted by the Court on September 26, 2025 [Doc. 16-17]. On October 3, 2025, Plaintiff filed its *Ex Parte* Application to Extend Temporary Restraining Order. [Doc. 19]. On October 6, 2025, this Court granted Plaintiff’s motion for extension of a temporary restraining order. [Doc. 20].

9. On October 27, 2025, Plaintiff filed its Motion for Preliminary Injunction. [Doc. 26]. On November 25, 2025, this Court granted Plaintiff’s Motion for Preliminary Injunction. [Doc. 62].

10. The Temporary Restraining Order [Doc. 17] required, inter alia, that third-party payment processors including, but not limited to PayPal, 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 October 29, 2025. [Doc. 29].

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, nor have Defaulting Defendants filed a motion requesting an enlargement of time to respond to the 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 the 10th of December, 2025 at Athens, Greece.

/s/ L. Ford Banister, II
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