

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

YIWU BAIMEI ELECTRONIC COMMERCE  
CO., LTD.,

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No.: 25-cv-13831

**Judge John J. Tharp, Jr.**

**Magistrate Judge M. David Weisman**

**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. (“Plaintiff”) by and through its undersigned counsel, moves for entry of default pursuant to Fed. R. Civ. P. 55(a) and for entry of final default judgment pursuant to Fed. R. Civ. P. 55(b) against Certain Defendants<sup>1</sup> (hereinafter, the “Defaulting Defendants”) identified on the Amended Schedule A consistent with the proposed order submitted herewith. A Memorandum of Law in Support is filed concurrently with this Motion.

---

<sup>1</sup> This Motion is against Defendant Nos. 2, 3, 9, 16, and 17 Identified on the Second Amended Schedule A.

Respectfully Submitted this 17th of February, 2026,

/s/ William Hausman  
Bar No. 6353083  
Ford Banister LLC  
305 Broadway – Floor 7  
New York, NY 10007  
Telephone: +1 (212) 500-3268  
Email: [whausman@fordbanister.com](mailto:whausman@fordbanister.com)  
*Counsel for Plaintiff*