

Real Example: Motorola / Lenovo Schedule A Lawsuit (Case 0:24-cv-62152-MD)

Lawsuit Timeline

Initial Notification to Sellers: March 12, 2025

Default Judgments Issued: May 9, 2025

Case Overview

- **Total Defendants:** 230
- **Default Judgments:** 178
- **Released Defendants:** 52

Outcomes After Default Judgment

Out of the **178 Default Judgments**, **93 Stores were shut down** by the marketplaces after the plaintiffs obtained court orders.

The remaining **85 Stores** were still active as of **July 2, 2025** — but most had **very low sales activity** (as shown by minimal feedback or ratings in the past 12 months). These stores were likely considered **not worth the cost** of enforcement by Motorola's legal team.

In contrast, **larger sellers** — particularly **DHGate stores** based overseas — may still be **undergoing trial or litigation**, which could explain why some high-volume stores are still operational despite a default judgment.

Seller Lawsuit Shield's Role

SellerLawsuitShield.com successfully assisted **6 of the 52 released defendants** in getting **completely dismissed from the case**, avoiding default judgments and protecting their stores.

We also reached out to several sellers who **chose not to accept our help** — some assumed the lawsuit was a scam or waited too long. Unfortunately, many of those sellers went on to receive default judgments and had their stores shut down permanently.

Why This Matters

This document offers a real-world breakdown of what happens in Schedule A lawsuits:

- ✅ Timely response can result in full dismissal
- ❌ Ignoring the lawsuit leads to a default judgment
- 📦 Not every default leads to a shutdown — but most do
- ⌚ Larger sellers may remain active due to pending litigation

Educational Purpose

This case is presented as a real example of the consequences and choices sellers face in Schedule A lawsuits. For privacy, some store names of released defendants have been redacted.

All annotations (✅, ❌, highlights, and watermark) were added by SellerLawsuitShield.com for educational purposes.

The original public filing is available via the U.S. federal court docket:

PACER Case 0:24-cv-62152-MD

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-62152-CIV-DAMIAN

MOTOROLA MOBILITY LLC, AND
LENOVO (BEIJING) LIMITED,

Plaintiffs,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED
LIABILITY COMPANIES, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS IDENTIFIED
ON SCHEDULE A,

Defendants.

REQUEST FOR CLERK'S ENTRY OF DEFAULT

Plaintiffs, MOTOROLA MOBILITY LLC, and LENOVO (BEIJING) LIMITED
("Plaintiffs"), by and through their undersigned counsel, hereby request that the Clerk enter default
in this matter against Defendants,¹ the Individuals, Corporations, Limited Liability Companies,

¹ Plaintiffs are not seeking default against Defendants CIQILY (DOE 1); eCRM (DOE 2); Sidpro (DOE 6); lenovoaudiostore (DOE 34); acxi_24 (DOE 67); addstore (DOE 68); allgowell2022 (DOE 69); allworldmart (DOE 70); ammoonmusic (DOE 72); anuba_16 (DOE 73); best_life2022 (DOE 77); best-shoper (DOE 78); business to worldwide (DOE 81); Cell Stores (DOE 83); China Electronics Center (DOE 85); cnmooisa (DOE 86); dajida (DOE 90); depaike2017 (DOE 91); dudutter (DOE 94); ebuy2013_store (DOE 95); EnergySUN Notebooks Parts (DOE 96); e-semitor (DOE 97); Eukeer (DOE 98); GC module (DOE 106); greenfenceline (DOE 109); homegarden2012 (DOE 112); islamicgiftsshop (DOE 115); jiayouba (DOE 117); kingelectronics666 (DOE 123); lb-battery (DOE 128); legendary-electronic (DOE 130); likesell365 (DOE 134); lotparts.store (DOE 135); luckystar666 (DOE 136); manysellok (DOE 139); minicamera_store (DOE 143); ndo624 (DOE 147); nirvana-bloom (DOE 150); qianjinj (DOE 157); qur6783 (DOE 160); Richbatt (DOE 166); Sell battery to worldwide (DOE 170); senzhistore (DOE 171); shopping-home888 (DOE 172); suku6567 (DOE 174); sunskysmile (DOE 176); Superb-Goods-4u (DOE 177); supern-6770 store (DOE 178); supernumberoneshop (DOE 179); theperfectdeal715 (DOE 180); vin-autoparts (DOE 186); warming-mall (DOE 187);

Partnerships, and Unincorporated Associations Identified on Schedule A hereto (collectively “Defaulting Defendants”) because the Defaulting Defendants have failed to respond to the Complaint within the time prescribed by the Federal Rules of Civil Procedure. *See* Declaration of Leigh Salomon in Support of Plaintiff’s Request for Clerk’s Entry of Default (“Salomon Decl.”), ¶ 6.

On March 12, 2025, pursuant to the methods of service authorized by the Court, all Defaulting Defendants were served via email and website posting with their respective Complaint, Plaintiffs’ trademark registrations, Issued Summons, Plaintiffs’ *Ex Parte* Application For Entry of Temporary Restraining Order, Including a Temporary Injunction, A Temporary Asset Restraint, and Expedited Discovery (“Application”) and its Memorandum, Client Declaration, and related exhibits in support of the Application, the Court’s orders granting and extending the TRO, and the Court Order authorizing alternate service of process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3). Salomon Decl., ¶ 3; *see also* Proof of Service [ECF No. 23].

Time allowed for the Defaulting Defendants to respond to the Complaint has expired. Salomon Decl., ¶ 4. Neither Plaintiffs nor the Court has granted the Defaulting Defendants an extension of time to respond to the Complaint. *Id.*, ¶ 5. Defaulting Defendants have failed to respond to the Complaint. *Id.*, ¶ 6. Plaintiffs believe that none of the Defaulting Defendants could be considered infants or incompetent persons. *Id.*, ¶ 7. Plaintiffs also believe that the Servicemembers’ Civil Relief Act does not apply. *Id.*

WHEREFORE, Plaintiffs, MOTOROLA MOBILITY LLC, and LENOVO (BEIJING) LIMITED, hereby request that default be entered against Defendants, the Individuals,

ximxz68 (DOE 190); yayaphoneonsale (DOE 194); TECOOL DIRECT (DOE 198); Best Monitor (DOE 201); DONGDONG (DOE 205); XUDUO (DOE 228).

Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations

Identified on Schedule A hereto.

Dated: May 9, 2025

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

/s/ Leigh Salomon

Leigh Salomon (FL Bar No. 1054106)

100 SE 2nd Street, Suite 2800

Miami, Florida 33131

Tel: (305) 357-8450

lsalomon@bsfllp.com

*Attorney for Plaintiffs MOTOROLA MOBILITY
LLC, and LENOVO (BEIJING) LIMITED*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of May 2025, I electronically filed the foregoing document with the Clerk of Court using CM/ECF. I also certify that I served or caused to be served the foregoing document to Defendants via email to the known email addresses and by posting the foregoing document on Plaintiff's Serving Notice Website (<http://motorola-lenovo-cases.com/case-24-cv-62152.html>), consistent with this Court's April 24, 2025, Order on Default Procedure [ECF No. 41] and February 20, 2025, Order Authorizing Alternate Service of Process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) [ECF No. 13].

/s/ Leigh Salomon

Leigh Salomon

✗ = Account Deactivated **✓ = Account still safe**

SCHEDULE A

DOE No.	Defendant Seller	Defendant Marketplace URL
✗ 3	LGM DYstore	https://www.amazon.com/sp?seller=A332CM5UHV8Z1D
✗ 4	Liaubn	https://www.amazon.com/sp?seller=A14TUYKO2YMQT7
✗ 5	shanxinaolubudianzishan gwuyouxiangongsil2	https://www.amazon.com/sp?seller=ASYK8HPV04IHN
✗ 7	abfl	https://www.dhgate.com/store/about-us/21748718.html
✓ 8	airpodusawarehouse	https://www.dhgate.com/store/about-us/21957333.html
✓ 9	awen845	https://www.dhgate.com/store/about-us/22003708.html
✗ 10	beatbud	https://www.dhgate.com/store/about-us/21961044.html
✓ 11	beauty_of_ting	https://www.dhgate.com/store/about-us/22002409.html
✗ 12	bluetooth1105	https://www.dhgate.com/store/about-us/21848450.html
✗ 13	dajianl	https://www.dhgate.com/store/about-us/21947230.html
✓ 14	ddmydesign	https://www.dhgate.com/store/about-us/21989855.html
✓ 15	ddmyhome	https://www.dhgate.com/store/about-us/21980114.html
✗ 16	eh7b	https://www.dhgate.com/store/about-us/21818482.html
✓ 17	electronicworlduu	https://www.dhgate.com/store/about-us/21709157.html
✗ 18	em7w	https://www.dhgate.com/store/about-us/21819805.html
✗ 19	esportset	https://www.dhgate.com/store/about-us/21885370.html
✓ 20	fansummer	https://www.dhgate.com/store/about-us/21804919.html
✗ 21	fqxt	https://www.dhgate.com/store/about-us/21819568.html
✗ 22	fzcte1	https://www.dhgate.com/store/about-us/21750745.html
✗ 23	fzctg7	https://www.dhgate.com/store/about-us/21751129.html
✗ 24	gp0b	https://www.dhgate.com/store/about-us/21800824.html
✗ 25	gtc7	https://www.dhgate.com/store/about-us/21818443.html
✓ 26	highquality4supplier	https://www.dhgate.com/store/about-us/21956578.html
✓ 27	highquality5supplier	https://www.dhgate.com/store/about-us/21956580.html
✓ 28	highquality6supplier	https://www.dhgate.com/store/about-us/21956581.html
✓ 29	homepro3	https://www.dhgate.com/store/about-us/21979012.html
✗ 30	hpqg	https://www.dhgate.com/store/about-us/21818324.html
✗ 31	hvug	https://www.dhgate.com/store/about-us/21800622.html
✗ 32	i969	https://www.dhgate.com/store/about-us/21819080.html
✗ 33	kbd3	https://www.dhgate.com/store/about-us/21819709.html
✗ 35	linzhiqiang2	https://www.dhgate.com/store/about-us/21904856.html
✓ 36	linzhiqiang3	https://www.dhgate.com/store/about-us/21904874.html
✗ 37	lka2s	https://www.dhgate.com/store/about-us/21800509.html
✓ 38	lochig	https://www.dhgate.com/store/about-us/21964417.html
✓ 39	loukoe	https://www.dhgate.com/store/about-us/21947031.html
✗ 40	lpdiy	https://www.dhgate.com/store/about-us/21800478.html
✗ 41	ocf8	https://www.dhgate.com/store/about-us/21800567.html

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last 12
Months**

	DOE No.	Defendant Seller	Defendant Marketplace URL
	✗ 42	omtyc	https://www.dhgate.com/store/about-us/21866172.html
	✗ 43	ouzej	https://www.dhgate.com/store/about-us/21818430.html
	✓ 44	podmax	https://www.dhgate.com/store/about-us/21961047.html
	✗ 45	psycetradingInc	https://www.dhgate.com/store/about-us/21296670.html
	✗ 46	pwlj	https://www.dhgate.com/store/about-us/21800877.html
	✗ 47	qq3f	https://www.dhgate.com/store/about-us/21819360.html
	✗ 48	qywz	https://www.dhgate.com/store/about-us/21800786.html
	✗ 49	smoktechvape	https://www.dhgate.com/store/about-us/20933785.html
	✓ 50	suifengpiao20	https://www.dhgate.com/store/about-us/21946292.html
	✗ 51	taa0	https://www.dhgate.com/store/about-us/21800736.html
	✗ 52	tfxk	https://www.dhgate.com/store/about-us/21818675.html
	✗ 53	ttre	https://www.dhgate.com/store/about-us/21800828.html
	✗ 54	v4zf	https://www.dhgate.com/store/about-us/21819657.html
	✗ 55	xemx	https://www.dhgate.com/store/about-us/21818326.html
	✗ 56	xsqh	https://www.dhgate.com/store/about-us/21818422.html
	✗ 57	yp6g	https://www.dhgate.com/store/about-us/21819027.html
	✓ 58	yuming1	https://www.dhgate.com/store/about-us/21942803.html
	✗ 59	zrgc023	https://www.dhgate.com/store/about-us/21951498.html
	✗ 60	10000 Plus Sold Items	https://www.ebay.com/str/10000plussolditems
	✗ 61	2013topteam	https://www.ebay.com/str/2013topteam
	✗ 62	3cheadphonestore	https://www.ebay.com/str/3cheadphonestore
28	✓ 63	3gnet	https://www.ebay.com/str/3gnet
	✗ 64	89era01	https://www.ebay.com/str/89era01
2	✓ 65	9irxx51	https://www.ebay.com/str/9irxx51
	✗ 66	acpower2022	https://www.ebay.com/str/acpower2022
0	✓ 71	amber.e-commerce	https://www.ebay.com/str/amber.e-commerce
	✗ 74	apstown	https://www.ebay.com/str/apstown
0	✓ 75	aradines92-6	https://www.ebay.com/str/aradines92-6
0	✓ 76	avista_shop	https://www.ebay.com/str/avista_shop
31	✓ 79	bravotech1983	https://www.ebay.com/str/bravotech1983
0	✓ 80	breezy_s	https://www.ebay.com/str/breezy_s
	✗ 82	buy_enjoy00	https://www.ebay.com/str/buy_enjoy00
19	✓ 84	cheerbuy2023	https://www.ebay.com/str/cheerbuy2023
41	✓ 87	colleyweed	https://www.ebay.com/str/colleyweed
	✗ 88	consumer-studio	https://www.ebay.com/str/consumerstudio
	✗ 89	curiosity-gadgets	https://www.ebay.com/str/curiosity-gadgets
	✗ 92	DIMA STORE	https://www.ebay.com/str/dimkhatab
	✗ 93	discountcenter555	https://www.ebay.com/str/discountcenter555
214	✓ 99	e-youngzone	https://www.ebay.com/str/eyounglife
0	✓ 100	ezy_buy	https://www.ebay.com/str/ezy_buy
5	✓ 101	faizanafzal	https://www.ebay.com/str/faizanafzal
444	✓ 102	floras0828	https://www.ebay.com/str/floras0828

Feedback
last 12
Months

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✔ = Account still safe

	DOE No.	Defendant Seller	Defendant Marketplace URL
1426	✔ 103	flygoodly	https://www.ebay.com/str/flygoodly
246	✔ 104	fodelight	https://www.ebay.com/str/fodelight
8	✔ 105	futuo_8354	https://www.ebay.com/usr/futuo_8354
	✖ 107	Global Turkish Market	https://www.ebay.com/str/globalturkishmarket
	✖ 108	Globalista Lifestyle	https://www.ebay.com/str/globalistalifestyle
	✖ 110	happylikebuy	https://www.ebay.com/str/happylikebuy
7	✔ 111	hererun30	https://www.ebay.com/usr/hererun30
154	✔ 113	ibilios9	https://www.ebay.com/str/ibilios9
	✖ 114	ironhide2017	https://www.ebay.com/str/ironhide2017
1	✔ 116	jayawas-0	https://www.ebay.com/usr/jayawas-0
	✖ 118	joereggae888	https://www.ebay.com/str/joereggae888
	✖ 119	JoyroomStoreAU	https://www.ebay.com/str/joyroomstoreau
0	✔ 120	judeebri99	https://www.ebay.com/usr/judeebri99
634	✔ 121	kaislaker	https://www.ebay.com/str/kaislaker
459	✔ 122	kenrger	https://www.ebay.com/str/kingenrger
	✖ 124	kiorsound	https://www.ebay.com/str/kiorsound
1	✔ 125	kriail1	https://www.ebay.com/usr/kriail1
185	✔ 126	kyzelectronic_888	https://www.ebay.com/str/kyzelectronic888
194	✔ 127	laptop-battery-store	https://www.ebay.com/str/laptopbatterystore
112	✔ 129	legendary-0_9	https://www.ebay.com/usr/legendary-0_9
	✖ 131	legoul18	https://www.ebay.com/str/legoul18
468	✔ 132	leo-shops666	https://www.ebay.com/str/leoshops666
638	✔ 133	lhmana	https://www.ebay.com/str/lhmana
	✖ 137	madisshop1	https://www.ebay.com/usr/madisshop1
0	✔ 138	mali04-3	https://www.ebay.com/usr/mali04-3
1	✔ 140	masrooj	https://www.ebay.com/usr/masrooj
17	✔ 141	meharadeem	https://www.ebay.com/usr/meharadeem
	✖ 142	meinna_0	https://www.ebay.com/usr/meinna_0
0	✔ 144	mohaalfa75	https://www.ebay.com/usr/mohaalfa75
0	✔ 145	nagi_shop5	https://www.ebay.com/usr/nagi_shop5
4	✔ 146	namagh0	https://www.ebay.com/usr/namagh0
803	✔ 148	Newpower0816	https://www.ebay.com/str/newpower0816
0	✔ 149	next_electronics_store	https://www.ebay.com/usr/next_electronics_store
	✖ 151	online.shop.unix	https://www.ebay.com/str/onlineshopunix
826	✔ 152	onlyguo	https://www.ebay.com/str/onlyguo
0	✔ 153	palace_of_goods	https://www.ebay.com/usr/palace_of_goods
0	✔ 154	pasdil54	https://www.ebay.com/usr/pasdil54
	✖ 155	Power_Adapter_Source	https://www.ebay.com/str/poweradaptersource
0	✔ 156	prototypee	https://www.ebay.com/usr/prototypee
	✖ 158	quality.dot	https://www.ebay.com/str/qualitydot0
12	✔ 159	qualitypower	https://www.ebay.com/usr/qualitypower
9	✔ 161	radseller5	https://www.ebay.com/usr/radseller5

Feedback**last 12****Months****✗ = Account Deactivated****✓ = Account still safe**

	DOE No.	Defendant Seller	Defendant Marketplace URL
0	✓ 162	ranweera_97	https://www.ebay.com/usr/ranweera_97
0	✓ 163	rayzlee	https://www.ebay.com/usr/rayzlee
4	✓ 164	ra-zad	https://www.ebay.com/usr/ra-zad
683	✓ 165	reff-84	https://www.ebay.com/usr/reff-84
33	✓ 167	rzdeal	https://www.ebay.com/str/rzdeal
	✗ 168	sam_ea	https://www.ebay.com/usr/sam_ea
0	✓ 169	seacrownwholesalershop	https://www.ebay.com/usr/seacrownwholesalershop
0	✓ 173	smart_gear_links	https://www.ebay.com/usr/smart_gear_links
	✗ 175	summer_sky17	https://www.ebay.com/str/summersky17
0	✓ 181	thiediri-87	https://www.ebay.com/usr/thiediri-87
1	✓ 182	tolud2384	https://www.ebay.com/usr/tolud2384
59	✓ 183	topteamshop	https://www.ebay.com/usr/topteamshop
	✗ 184	trendy_alley	https://www.ebay.com/usr/trendy_alley
	✗ 185	Uncle Sam's Shop	https://www.ebay.com/str/samhop
11	✓ 188	watchfulboutique	https://www.ebay.com/usr/watchfulboutique
396	✓ 189	xijude	https://www.ebay.com/str/xijude
	✗ 191	xinyue-power	https://www.ebay.com/str/mukizrepowerflagshipstore
	✗ 192	xlh-electronics	https://www.ebay.com/str/xlhelectronics
43	✓ 193	xyelec-41	https://www.ebay.com/str/xyelec41
2	✓ 195	yo_405649	https://www.ebay.com/usr/yo_405649
0	✓ 196	zucatuga	https://www.ebay.com/usr/zucatuga
	✗ 197	MingGuang Mall local	https://www temu.com/-mall-local-m-634418216533534.html
	✗ 199	Whimsical Wanderlust	https://www temu.com/whimsical-wanderlust-m-634418217265826.html
134	✓ 200	AceMonster	https://www.walmart.com/seller/101223708
19	✓ 202	Childlike Paradise	https://www.walmart.com/seller/101256230
	✗ 203	Chnzic	https://www.walmart.com/seller/101646748
21	✓ 204	daernabaoshangmao	https://www.walmart.com/seller/101694616
	✗ 206	Feltree	https://www.walmart.com/seller/101196001
	✗ 207	floiliyvm9c2	https://www.walmart.com/seller/102478510
	✗ 208	FSSMER	https://www.walmart.com/seller/101329065
	✗ 209	guangzhoubaoruicanyiny ouxiangongsi	https://www.walmart.com/seller/102601885
	✗ 210	hongfukeji	https://www.walmart.com/seller/102576097
40	✓ 211	JABUO	https://www.walmart.com/seller/101636003
	✗ 212	JOTOETYYS	https://www.walmart.com/seller/102581793
4	✓ 213	JZWLXX	https://www.walmart.com/seller/102486538
	✗ 214	lalaxiaohumaoyi	https://www.walmart.com/seller/102580542
	✗ 215	LanLaiShangMao	https://www.walmart.com/seller/101632413
7	✓ 216	liuhuili1213	https://www.walmart.com/seller/101341000
	✗ 217	MeiPingDianZi	https://www.walmart.com/seller/102503481

Feedback
last 12
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DOE No.	Defendant Seller	Defendant Marketplace URL
✗ 218	MinHou	https://www.walmart.com/seller/102513122
✗ 219	pinqinfang	https://www.walmart.com/seller/102580548
2 ✓ 220	QYYA	https://www.walmart.com/seller/102486505
19 ✓ 221	ruixin5	https://www.walmart.com/seller/101650323
7 ✓ 222	Self-timer	https://www.walmart.com/seller/101255093
✗ 223	shijianyinpindian	https://www.walmart.com/seller/102590894
✗ 224	sidajianweikeji	https://www.walmart.com/seller/102579643
1 ✓ 225	Songsiqing Trading	https://www.walmart.com/seller/102503653
✗ 226	SYnong shop	https://www.walmart.com/seller/102495174
34 ✓ 227	WNG	https://www.walmart.com/seller/101227008
✗ 229	YIQIMAI	https://www.walmart.com/seller/101559482
✗ 230	Yomiee HOME&OUTDOORS	https://www.walmart.com/seller/101188102
✗ 231	YQWLXX	https://www.walmart.com/seller/102486484
✗ 232	zhijiangshinenrongshang mao	https://www.walmart.com/seller/102486663
✗ 233	696 official store	https://www.wish.com/merchant/635a26654160cf3cf84553f9
✗ 234	neom	https://www.wish.com/merchant/65918cc07c788a9cfbd11117
✗ 235	TomTop	https://www.wish.com/merchant/52b4f71b796f6856bfedc840
✗ 236	TurkishSouq	https://www.wish.com/merchant/62317f581501a21f247f4b33

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 24-62152-CIV-DAMIAN

MOTOROLA MOBILITY LLC, AND
LENOVO (BEIJING) LIMITED,

Plaintiffs,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED
LIABILITY COMPANIES, PARTNERSHIPS, AND
UNINCORPORATED ASSOCIATIONS IDENTIFIED
ON SCHEDULE A,

Defendants.

**DECLARATION OF LEIGH SALOMON IN SUPPORT OF
PLAINTIFFS' REQUEST FOR CLERK'S ENTRY OF DEFAULT**

I, Leigh Salomon, declare and state as follows:

1. I am over 18 years of age, and I have personal knowledge of the facts set forth herein. I make this declaration in support of Plaintiffs' Request for Entry of Clerk's Entry of Default against Defendants listed on the Schedule A attached to Plaintiffs' Request (the "Defaulting Defendants"). If called upon to do so, I could and would competently testify to the following facts set forth below.

2. On November 13, 2024, Plaintiffs filed their Complaint against Defendants, the Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A (collectively, "Defendants").

3. On March 12, 2025, pursuant to the methods of service authorized by the Court, all Defaulting Defendants were served via email and website posting with their respective Complaint.

Plaintiffs' trademark registrations, Issued Summons, Plaintiffs' *Ex Parte* Application For Entry of

Temporary Restraining Order, Including a Temporary Injunction, A Temporary Asset Restraint, and Expedited Discovery (“Application”) and its Memorandum, Client Declaration, and related exhibits in support of the Application, the Court’s orders granting and extending the TRO, and the Court Order authorizing alternate service of process on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3). Salomon Decl., ¶ 3; *see also* Proof of Service [ECF No. 23].

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

5. The Defaulting Defendants have not been granted an extension of time to respond to the Complaint.

6. The Defaulting Defendants have failed to respond to the Complaint.

7. I have no reason to believe that either any of the Defaulting Defendants are infants or incompetent persons or that the Servicemembers’ Civil Relief Act applies.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed the 9th day of May, 2025, at Miami, Florida.

/s/ Leigh Salomon
Leigh Salomon