

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DOGGIE DENTAL INC, *et al.*,

Plaintiffs,

v.

AHUI, *et al.*,

Defendants.

Civil Action No.

19-1627

(Judge Hornak)

MOTION FOR ENTRY OF DEFAULT JUDGMENT AND PERMANENT INJUNCTION

Plaintiffs hereby move for entry of a Default Judgment and Permanent Injunction pursuant to Federal Rule of Civil Procedure 55(b)(2) against the Defendants set forth on **Exhibit A** hereto, all of whom are in default. The grounds for this Motion are set forth in the accompanying Memorandum in Support.

Plaintiff respectfully request the following relief against Defendants: 1) the entry of a final judgment and permanent injunction by default in order to prevent Defendants from infringing Plaintiffs' intellectual property rights in the future¹; 2) award of \$2,128,500.00 against each Defendant, plus post-judgment interest; 3) a post-judgment asset restraining order and 4) an order authorizing the release and transfer of Defendants' frozen assets to satisfy the damages awarded to Plaintiffs.

¹ Plaintiffs hereby waive damages under all other Counts and further waives attorney's fees.

Respectfully submitted,

Dated: February 16, 2021

/s/ Stanley D. Ference III

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Attorneys for Plaintiffs

Schedule "A"

Defendants with Seller ID and Status

Def. No.	Defendant/Store Name	Seller ID	Status
█	█	█	█
2	Ailivehome	A2Q37ZZMRPWEUV	Defaulted
█	█	█	█
█	█	█	█
█	█	█	█
7	Artker	A1LTFO55JILCQ2	Defaulted
█	█	█	█
9	Augama	A2A5F1J2BTE5O5	Defaulted
█	█	█	█
11	Autozity	ATVDEQ3O2D7PY	Defaulted
12	Axiao Xiao	A3SRZL3PDSSGPU	Defaulted
13	Aya Chic	AV58HO4Y4YG5	Defaulted
14	Ayebeau	A2GOBGX3PC0YNJ	Defaulted
15	Babaer	A2X8047YTWB3QG	Defaulted
16	Bettersounds	ARCWMCB8R9G28	Defaulted
17	Bibolin	A1596LJ1S5W3TG	Defaulted
18	Big Desert	A2CQ3M4XU1WT8J	Defaulted
19	Boafig	A33GCS1BVSIGL2	Defaulted
█	█	█	█
21	BRHHO	A1PBBFMFMOEZ72	Defaulted
█	█	█	█
23	Broshoo	A3DZSMYMI1CGXN	Defaulted
24	BUOCEANS-SKY	A1ON3DR30UNJHY	Defaulted
25	BUYBST	A1ZLNBDINT4IZU	Defaulted
█	█	█	█
27	Chaomike	A1MUD9GV35XJN5	Defaulted
█	█	█	█
29	Cyrapid	A2H9A2I79SE359	Defaulted
30	Cyrapid Direct	A2L3N86K9OOJ00	Defaulted
31	Dawginme	A6MFQINS9TKP3	Defaulted
█	█	█	█
33	Doubletrain	A2BZJ01X7OFC	Defaulted
34	DR Bucks	A331COZNMVERF	Defaulted
█	█	█	█

█	█	█	█
37	DXH2019	A3M8MU0XHHR13U	Defaulted
38	Earthly Hand	A3HKUNZ7QQ4AD8	Defaulted
39	Elyvate	A1IPX60SQL9IEQ	Defaulted
40	Emgoods	A2LPDVL9EG7Y8D	Defaulted
█	█	█	█
█	█	█	█
43	EVENTS	A3NPMCN3ASH8M4	Defaulted
44	Everyday Joy	A32042ABW1EBA8	Defaulted
█	█	█	█
█	█	█	█
█	█	█	█
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█	█	█	█
█	█	█	█
█	█	█	█
52	Gardencolo	A24TIWOB6Y52IL	Defaulted
█	█	█	█
54	Grasp It	A2IO9PWGSATNPH	Defaulted
55	Hanheng	A2UPRT91JV93PY	Defaulted
█	█	█	█
57	HAPPY MARIE	A20ZIABWRFKMA9	Defaulted
58	Heacra	AGVE3N6Y5CYPB	Defaulted
█	█	█	█
60	Hinrylife	A1KLHJR9WIMQXT	Defaulted
█	█	█	█
█	█	█	█
63	Hongsound	A3PTAN2I58BT4Z	Defaulted
64	HULUN	A2XBW8WTZGI7TK	Defaulted
█	█	█	█
█	█	█	█
67	JALLAB	A3FQ5H4F6HMW2Y	Defaulted
68	JerJen Business Solutions	A2PQ2V6AX51B8D	Defaulted
█	█	█	█
70	Jiasber	A15C2T7YZ8QIDS	Defaulted
71	JINGSHENG TEC	AB11VYRIO8TE	Defaulted
72	Jpettie	A2YGY78UR8AVK6	Defaulted
█	█	█	█
█	█	█	█

█	█	█	█
76	KELAD	A2MZV8VHYSK1OY	Defaulted
█	█	█	█
█	█	█	█
█	█	█	█
80	KNNSRE	AAA6O4A42RACT	Defaulted
81	Kutrer	A2FT22UGQSBDG3	Defaulted
82	LAVYU SHOP	A1HKBCWJ4EX7YI	Defaulted
83	LEOHOME Direct	ASM1G21RKWQVG	Defaulted
84	LEVETT STORE	A1YQCLYW752GQI	Defaulted
85	Lingweida2018	A1BED976EGRA99	Defaulted
█	█	█	█
87	LISTOS'	A6HG3VO4UEWN9	Defaulted
█	█	█	█
89	LMP-PRO	A1IO52YR61IZR9	Defaulted
█	█	█	█
█	█	█	█
█	█	█	█
█	█	█	█
█	█	█	█
█	█	█	█
96	Marcek	AWDL348ZQ8N4Q	Defaulted
█	█	█	█
98	MIRYUM	A2D0P7B0LUIPOK	Defaulted
█	█	█	█
█	█	█	█
█	█	█	█
█	█	█	█
█	█	█	█
104	Mulan&PH Factory	A2SU0GAVJ9OA9J	Defaulted
105	NEWA TRADING	A10I7J9V9M8UOX	Defaulted
█	█	█	█
107	Niuworld	A3DOF2HOZYWW1W	Terminated
█	█	█	█
109	Okistore	A2FKVCM8E90CN7	Defaulted
█	█	█	█
111	OUTUNG	AS7QBW9ESCL9F	Defaulted
112	PAHOO LLC	A1PBK72SX0L8IP	Defaulted
113	PauliaTT	A3K8K2UU71WIT9	Defaulted

█	█	█	█
█	█	█	█
█	█	█	█
117	Popiy	A1Q9OSIFTKPHWR	Defaulted
118	Positive Vibes Express	AGEUY7G2B7SJ8	Defaulted
119	Pounce n Play Shop	A2ZULWH0LC4SA6	Defaulted
120	PrestigeWD	A1IWUYFQ8VPBJA	Defaulted
█	█	█	█
█	█	█	█
█	█	█	█
124	Roce Today	A2HDQ4UQ1J0OF5	Defaulted
125	Rolkstone	A3QQ5K8GTSXFUD	Defaulted
126	Shaks goods	A27ZPTUC3E5HSF	Defaulted
█	█	█	█
█	█	█	█
129	SIRAY US	A3FKKDXF1C4S2J	Defaulted
130	SmileToSell	AZ132CXWZM3HD	Defaulted
█	█	█	█
132	Tainni	A2E59C3851JHM0	Defaulted
133	Telvo Zan	A2RC7Q07GD3RH	Defaulted
█	█	█	█
█	█	█	█
█	█	█	█
█	█	█	█
138	Typscoldt	A1MCEOOSW27MAR	Defaulted
139	UKSIDE	A10KV9KRQ12CA7	Defaulted
█	█	█	█
141	Vndaxau	A29LGGMEB2YKCZ	Defaulted
142	WiseDare	A333C8NL57A6TA	Defaulted
█	█	█	█
█	█	█	█
145	Xuanbon	A35P6T4SL4VZQE	Defaulted
█	█	█	█
█	█	█	█
148	Yiwu Lanjie Trading Co., Ltd	A6LZWYNZ7QGCD	Defaulted
149	Yocolostrap	A2GL7JZEGNR5TQ	Defaulted
█	█	█	█
█	█	█	█

CERTIFICATE OF SERVICE

I hereby certify that on February ____, 2021, the foregoing document is being filed via the Case Management/Electronic Case Filing (CM/ECF) system; I also certify that on the same day, a true copy of the foregoing is being served in accordance with the Order Authorizing Alternate Service.

/s/ Stanley D. Ference III _____
Stanley D. Ference III