

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

DOGGIE DENTAL INC, *et al.*,

Plaintiffs,

v.

CDOFFICE, *et al.*,

Defendants.

Civil Action No.

21-271

(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 **Schedule A** hereto, all of whom are in default. The grounds for this Motion are set forth in the accompanying Memorandum in Support.

Plaintiffs 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 future; <sup>1</sup> 2) award of \$2,128,500.00 against each Defendant, severally and distinctly, 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.

An appropriate Proposed Judgment is filed herewith. The Court previously entered a Default Judgment and Permanent Injunction in the related case of *Doggie Dental, Inc. v. Ahui*, 19-cv-1627 (C.J. Hornak, September 27, 2021)(DE 129). The text of

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<sup>1</sup> Plaintiffs hereby waive attorney's fees.

this Proposed Judgment, other than Schedules A and B and the respective Third-Party Service Providers is identical to that of the Final Judgment entered in *Ahui*.

Respectfully submitted,

Dated: December 10, 2021

/s/ Stanley D. Ference III

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Attorneys for Plaintiffs

**CERTIFICATE OF SERVICE**

I hereby certify that on December 10, 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

**Schedule "A"**  
**Defendants by Store Name and Seller ID**

Defendant No.	Store Name	Seller ID
[REDACTED]	[REDACTED]	[REDACTED]
2	ACGE LLC	A1BKKTQIKG0Q1B
[REDACTED]	[REDACTED]	[REDACTED]
4	AOMETECH	AJ5KGWPO1ZJP6
[REDACTED]	[REDACTED]	[REDACTED]
6	BIGSUPERMALL	AZBBFPJUQ1X5P
7	BLAMCES INNOVATION	A2ORRMVQSEBION
8	BUDDY & BELLA	AP87H0LBW6ANU
9	BUNTHA.WINEE7098	A2P7HKPXZ86JGM
10	BUYER'S HAPPINESS	A36AW7PWD83LJO
[REDACTED]	[REDACTED]	[REDACTED]
12	COOLOH BIKE	A2EFMTFHX7SHZ8
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
16	ELLIARY-L	A24J7S9IW08C0W
17	ERICHOME	A1G3TRH46Z9DNM
18	ET BBBQ	A1EQ7KZKHOU0FF
[REDACTED]	[REDACTED]	[REDACTED]
20	EYE SEE	A2R4QSOM0GN8MP
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
23	FREYAMALL US	A2C9WB9G49X2M3
[REDACTED]	[REDACTED]	[REDACTED]
25	HANY	A1Q3HM0IW8DRWS
[REDACTED]	[REDACTED]	[REDACTED]
27	HONG BANGZHUANGSHI	A2NSJW1EFUROOE
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]
31	HUDUDU	A3AGCMKNL8JYH8
32	IACROS	A27WHABR7AW05V
33	IO.PRODUCTS	A37VBGZ52HT94
[REDACTED]	[REDACTED]	[REDACTED]

36	JUSTIDEA88	A1WZ2466W8SDA5
40	KNY GLOBAL	A4PE0YIU2AQ05
41	KURILIN STORE	A3THKZPKKBDSZ9
44	LIFEHACKR	A2R11B235CDHSW
48	LIVECREATIVE	A2XRB451VK224M
49	LKWXW	A3MW9GZDA7Y04W
50	LOVELY PETS	A1OP7QLWWPVI8R
51	LUCKY EGG STORE	A1SSUBEAKOBA9F
52	MAYII	A113KDYJJ9EE95
53	MC ONE	A1WL6UPZIK4MD0
56	MEWAJUMP TECHNOLOGY	A2UBRE946Z6VKI
57	MIYHA	A3VJO6QDJD6C4U
60	NARAKSPORT	A26UJ9L8PVDPOT
63	NOTTODAY	A3S88F4ORA904G
64	OAKEN.OC9	A2LBTJ4DJQ85HA
67	PACIFIC-HOME	A1O1LMTM9SJTJR
69	PNPCORP	A3VZETOCQRLQRW
73	RJSEMIFUN	A20IW23DGCN59H
75	SDEER	APJ40UTQTO3ZP
76	SHERRY MEI	A3L25SVOB5O0ND

77	SINGSKA	A3PHC31CZ9QG6E
78	SMARTPET (FORMERLY KNOWN AS QPQEQTQ)	A39LUGBQZM45RQ
81	SOLCLAIR	A3CE0WUVA70I2S
82	SONG YUAN	A2M4EHE8HBPOAM
83	SPLOVEUNIAA	A1A17HBMAV0S3Y
87	SUPER STORE - SYMINGTON	A8CJCC0K1MERY
88	TAKEBEST-US	ASB1IXO9O6LAO
89	TALL SHOP	A2Z96SY8672GBG
94	TRANS GLOBAL	A31JT4RCS4EPR5
96	WAK-US	AYYV4X5XQ6A7O
97	WANKADA	A3Q1JHBDN2JSU
98	WEIPUTEK	A20F2K66M5H7R7
99	WELLNESSPIC	ALI94TR7IPL0O
100	WINSB	A33C2BFU0OSBLW
101	WONDERFUL320	AATDU7ZJEZK05
102	WOOWI0760	A35H1SJPCAGBPM
103	XI TING	A28LZPPVYER8VP
106	YSTECH	A3SY16CS62BSU8
108	ZCXINW	AJTCY0WAPBPZV
110	ZISITA	A111KBQGAK3KBQ
111	ABEDOE DROPSHIPPING STORE	4430072
112	ABEDOE ENERGETIC STORE	4412156
113	ABEDOE FRANCHISED STORE	3091109
114	ANIMAL ZONE STORE	5570006
115	ARCTANGENT STORE	5068441
116	BETTERPET STORE	5191019

118	CHINELY STORE	5068164
119	CHONGLEGU OFFICIAL STORE	5369301
120	CINDY HOMEWARE STORE	4506014
121	COMFORTABLE PETS HOUSE STORE	1934942
122	DAILY GADGETS STORE	5049011
123	DAILY LIFE HOUSE STORE	5419227
124	DO DROP SHIPPING STORE	3514108
125	DOGBABY OFFICIAL STORE	1817157
█	█	█
█	█	█
█	█	█
129	EASYDREAM STORE	5050290
130	ETSREWO STORE	5209005
131	FACEMASK FACTORY STORE	5737156
132	FARM ASSISTANT STORE	1702147
133	FIYDND5 STORE	4979086
134	GREEN HONEYPET STORE	5371089
█	█	█
136	HALASHOP STORE	5007150
█	█	█
█	█	█
139	HEREHERE STORE	5441303
140	HEYPET STORE	2389086
141	HOMESYARD STORE	424242
142	HTOP HOMELIVING STORE	5564084
143	JANREE LIFE STORE	5545007
144	JAYHOME STORE	4058012
145	JOYLIVE STORE	5789518
146	JOYLOVE STORE	5429126
147	JUNEJOUR DIRECT STORE	5401045
148	KATHLEENHOUSE0086 STORE	5370219
149	KEMISIDI KEMISIDI STORE	4526038
█	█	█
151	LEAGUE OF PETS STORE	5006319
152	LEISURE AND HOLIDAYS STORE	5517077
153	LEMONBEST FRANCHISED STORE	1767312
154	LEMONBEST INTELLIGENT STORE	4627028
155	LHUANG ONLINE STORE	5419212
156	LIXING RETAIL STORE	5507028
157	LOVEPETS STORE	3474026
158	LYPET STORE	4038010
159	MGKPET GLOBAL STORE	5049344
160	MT HOMEWARE STORE	5499083

161	OVERSEAS DROPSHIPPING FACTORY STORE	5419171
164	PETCLOUD STORE	5378198
165	PETS HOMES STORE	5042204
166	QLUQ GARDEN STORE	4881025
167	SAB LOVES LIFE STORE	5277021
168	SHERGUT STORE	4503097
169	SHOP BEAUTIFUL LIFE STORE	3100045
170	SHOP09201996 STORE	5017168
171	SHOP4399105 STORE	4399105
175	SHOP5316019 STORE	5316019
176	SHOP5367212 STORE	5367212
177	SHOP5568062 STORE	5568062
178	SHOP5680040 STORE	5680040
179	SHOP5700129 STORE	5700129
180	SHOP5794112 STORE	5794112
181	S-I-M-P-L-E STORE	5069022
182	SMARTPET STORE	4706019
183	STRIKATE STORE	4767032
185	TIEHO WARM HOUSE STORE	5249063
186	TOPFENG HARVEST STORE	4429180
187	ULTRASOUND PET DAVID STORE	4826012
188	ULTRASOUND PET MIMI STORE	5438156
189	ULTRASOUND PET OFFICIAL STORE	4637027
192	WEIXINBUY FRANCHISE STORE	3115085
194	XINLING STORE	5623178
195	XINLUHOME STORE	4644096
196	XINYOU STORE	4391017
197	YOCOMYLY 511511 STORE	511511
198	YU2019 STORE	5048186
199	ZHANGYI HOMEGARDEN DECORATION STORE	1271096
200	ZLOOG OFFICIAL STORE	5045006
201	AJIESHOW	5d57db89560eca4252eebc98

202	ALICEBABY678	5993eac7eea5c56ee78660d0
203	ANNIE BABY STORE	591057257e5f0b2c1732becb
206	CAIJU TEMAI LUCKY	5af6b7715ccdca7afc2e26d0
208	CHEETAHQIONG	5ab10cfda6bf7a56f1df6394
209	CHENLIPINGSTORY	5b3478dab40ac115187e8adc
210	CHUNFUWANJUDIAN	5b3f032f1c895306f19469be
211	CIELOSPORT	5dca20c4739c24024063c575
212	CLIX4129	5dc03b85df5137841cb0b673
213	COREY RAPPE	5e73964a5021d6c9903ff08d
214	CY916	5abcd55c22fad77e75eb83fd
215	FANGMINGSO	5e16dab28ea5a7048d448532
216	FASHION TOOLS	58d65c417586f72c8f9ec0f8
217	FENFENMEN	5b3b00348584ad1524d5a250
220	FUZHOUYOUKENMAOYIYOUXIANGONGSI	570b82003a698c33a07a16ff
222	GEGECOMPANY	581da4ac34afa75459f662b5
224	GLOBAL MTSHP	5cbf1ee84cd44a132973af95
225	GLORIOUSSHOW	5ad04c5b421595798d8f43e2
226	GONGJIANGYANG	5a1678f77276537ea2ea0651
227	H877XOQPU	5e7ba756865f1a94b08c4b7e
229	HH_MANGO	5d3d91b3ab0c792ec0a59d1c
232	HZSDYOUTH23	58d617d962982052aba8da51
233	IMIXEXPRESSIVE FAITH	5dff6d328a92b34c7320789d
234	J83491860	59f71424518c1c0c7512bd82
235	JOSED02	5dc21a5480c41b0395ddff52
236	LA BOLEADA	5da5e26ac095e14580b49b38
237	LOVE FOR LIFE&SELF	5dff02ef0cfa143d49e76cab
238	MAKE SHOPPING FUNNY AGAIN	5bec2cc99639b4595b027ba0
239	MILK BREAD	58c10f544aae6052172673d9
240	MING FASHION STORE	548ef2cbb9cb9261bf879445
241	MINGPINGMAIYI	5b67c4a303523d3d4887721b
243	MYDEAL365	5ac3036ba71fbf304137ae49
244	MYMIN2543	5def477670f95b0392d61767

245	MZJH33	58bd59029657445312713e83
█	█	█
247	NBOSOPPKSM	5aefbfe01c25004e5cfbf313
248	NEWFIREPINLER	58b3dcfdcb842150e9cc8b7d
249	NINGHAI SUNRAY	58a166727477cb510673faaf
250	NISHGNEKAHGD	5a9e9c7267d25c2510337f5f
251	NXHIPNNER	5b14a51b7e43f21f285ebbf6
█	█	█
253	OVERLACKCAT	5ab886b61c256d1f094e3f04
254	PAMPERS	5def4e0370f95b047ed61852
255	PANATIENDA	5de5dcc602c87406d35c9b91
256	PANDITA	5dab2f1569ce7503c0f82e16
257	PINAOZHAO70	5b4febef0fa3695898e47e0e
258	QTWKGNUI	5d4fedc47ad24274cbf71fd4
259	SAVE YOUR DOLLARS	5b4cc056d5dbc250fee33b3e
260	SDAGJK	5d4ec4911527546dc2ad52ec
261	SEA EATING	5d5a889c2736784edc1780fe
262	SEEKNFIND	5e91f67c1a25abd3afb767f9
263	SEHBESTHAIR	56a9c2423a698c52507694f6
264	SELLINGFUN	53a94b04ff4d6d61827b593b
█	█	█
266	SHENZHENMINGSHUNXIN	54215d7cf420dd08ee38cff5
267	SHIZIHUIBAO	5a0587728cf0ed27084f76d7
268	SHOPAUCTION	599e82ae2351346206c3cd71
269	SKKYY	5e61bcac2ff71a004e9c6d07
270	SMART - KIDS JUICER	595b972737635d60b412e62e
█	█	█
█	█	█
█	█	█
274	SUNEUISN2	5e0ae54a4f77a60234ce7c02
█	█	█
█	█	█
277	UVSHOPPING	58ee0d4fca1ebd5e5725f1bd
278	VENDING SHOPS	57640e526dd5a55e28205152
279	W5 FACTORY	5d5deaac560eca35ca0f187a
280	WENVHGRTE10	5e4ce21401ba9d174f318fc9
281	WWD FASHION STORE	5d85c90ea9356a4e79a74ce4
282	XD FASHION STORE	5d786b2a51da4f64ca27dcc6
█	█	█
284	YDH789	5af51bb98699ce7c14d20389
█	█	█
█	█	█

287	ZEWOO-SHOP	547884818edcfa5656ca94d5
288	ZRKKGM	5d57aeb640defd63baaca7ea
289	ZUCCYOUTH0139	59f5421be6503337d8899a16
290	ZX007	5e92c98c1a25ab2180bad479
291	ZZ YIZE	5d5cc17d40defd36e7a725a3