

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

DOGGIE DENTAL INC, *et al.*,

Plaintiffs,

v.

AVANTDIGITAL, *et al.*,

Defendants.

Civil Action No.

21-565

(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; ¹ 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

¹ Plaintiffs hereby waive attorney's fees.

this Proposed Judgment, other than Schedule A and B and the named Third Party Service Providers is identical to that of the Final Judgment entered in *Ahui* except as to Part IV of the Proposed Judgment. Instead of Amazon.com, Aliexpress.com, and wish.com, the relevant online platform is eBay.com and the Amazon Identification Numbers have been removed since they are not relevant to eBay.

Respectfully submitted,

Dated: December 10, 2021

/s/ Stanley D. Ference III

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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 With Store Name and Seller ID

Defendant No.	Defendant/Store Name	Seller ID
█	██████████	██████████
2	0731*2013	264358064699
3	2013BLINGMALL	372657554625
4	2018OUTDOOR5	113881101110
5	777MYSHOP777	312851162528
█	██████████	██████████
7	ABIGALEKIDS	163998900765
8	AIWENGOING	264570773784
9	ALMINKO_0	392620628407
█	██████████	██████████
11	ANTOP3302	223766125027
█	██████████	██████████
13	ARROWHUNT	133278654922
█	██████████	██████████
15	AVRAM-2-DEALS	114054879835
16	AWESOME.365	143468073178
17	AZBASE	352776594675
18	AZCOOL	163812406734
19	BAN6067	283731592587
20	BAYSHINECOOLER	333340822090

Defendant No.	Defendant/Store Name	Seller ID
21	BELABU0	193200279599
22	BEST_FASHIONAL	164273595246
■	██████████	██████████
■	██████████	██████████
■	██████████	██████████
26	BUYADISE	184102976494
27	BUYITNPW	133489860155
28	CCS3226	223763062302
29	CENTERSTOCK	113951084441
30	CHOLLATIS	274122803013
31	CLOUD1437	143478416113
32	COACHEER	312731674586
33	CRAFTDIYONLINE	372866370318
■	██████████	██████████
35	DAYBUYDAYFORYOU	163946768803
36	DISCOUNT-E-MALL	392534370753
37	D-MALL	163860365170
38	DOGSTAGRAMLOVE	124006622658
■	██████████	██████████
40	DOUBLAWIN	233371613174
41	E.SHOP.2019	312565371324
42	EIFACTION	293204505573
43	ENERGYSAVING-LED	163755339541
44	ESTORES G	113831782676

Defendant No.	Defendant/Store Name	Seller ID
■	■	■
46	FAAASHION_STORE	283603616551
47	FAIRYARD	293331718874
48	FASTNEWSALES	124001711587
49	FEABOA0	383071343627
50	FEIAIA0213S	153735447637
■	■	■
52	FREESTYLE_SHOPPING	352885610729
53	FUNBUYIT	233375502283
■	■	■
■	■	■
■	■	■
■	■	■
58	HAPPYLIFEDEALS	174119467409
59	HEBA_KH	401877607094
60	HOMIES_GOOD	163745449534
■	■	■
62	I-DOMESTIC	113841227571
63	ILOVETABLETPC2014	202680519565
64	IN*GOD*WE*TRUST	113901221334
65	INBARFARKASH2001	153784306800
■	■	■
67	IUCOOL	233281726583
68	JAMES2012	123429913849

Defendant No.	Defendant/Store Name	Seller ID
■	■	■
70	JULAPANYA-0	392564481520
71	JUNE_085	254070575583
72	JUSTINYRD	383137659115
73	JUVY97	183801005946
74	KINGSEA8	163828756170
75	KYUCIM	324019228431
76	LARGEWORLD3	202781277044
77	LETTERBU619	264573932362
78	LIFEFIRSTPLACE	303301960701
79	LILLYK91	332925089849
■	■	■
81	LINYAN1986_3	202859618622
82	LOVE.SUNFLOWER	202751830727
83	LPCHENMJ	264498250039
84	LUCKYAUCTION2011	143373384669
■	■	■
86	LYNWORRAL_0	143374452638
87	MAGIC.HOUSE2013	163808640129
■	■	■
89	MANFREDOG	372766306534
90	MICHAEEELIYAH_0	153624866049
91	MIGOSTORE87	202750360621
92	MSW4BABY	264414891858

Defendant No.	Defendant/Store Name	Seller ID
117	ROSY_DAYS	163660341166
118	SAFELECTRON	264428221704
119	SAMSUN16	323711282483
120	SATUKEREK	352747106774
121	SAVEONLINEDEALS	372752737702
122	SCARBOROUGH-8	123836582850
█	██████████	██████████
124	SHOP667788	273991716320
125	SHUSHHO-0	123762427055
█	██████████	██████████
█	██████████	██████████
█	██████████	██████████
129	STAYPOSITIVE_STORE	401862599047
130	STOREADIL	193102459921
131	STYLISHMOMENT	223491681303
█	██████████	██████████
133	THTA70	324032846916
█	██████████	██████████
█	██████████	██████████
136	TRANSBETTER	372851702556
137	TURTGOODS	223658138543
138	UNIVERSALSTORE2018	132876527010
139	VAKEWEAR	392544851502
█	██████████	██████████

