

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

GORGE DESIGN GROUP, LLC, *et al.*,

Plaintiffs,

v.

ACCESSMALL, *et al.*,

Defendants.

Civil Action No. 19-1454

(Judge Stickman)

**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** filed herewith as an attachment to the Proposed Default Judgment, 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 of \$2,000,000.00 against each individual Defendant, and a permanent injunction in order to prevent Defendants from infringing Plaintiffs' intellectual property rights in the future; 2) a post-judgment asset restraining order; and 3) an order authorizing the release and transfer of Defendants' frozen assets to satisfy the damages awarded to Plaintiffs. A proposed Order granting the relief sought is submitted herewith.

Respectfully submitted,

Dated: January 18, 2022

/s/ Stanley D. Ference III

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Attorneys for Plaintiff

**Schedule “A”**  
**Defendants With Store Name and Seller ID**

<b>Defendant No.</b>	<b>Defendant/Store Name</b>	<b>Seller ID</b>
█	██████████	████████████████████
2	anticipate	5911303d4cb67623d7bc4cdb
3	chanzon	594e136cabea91780b592536
█	██████████	████████████████████
5	cindydress	5922cbb7f4a3d44d77d19e18
6	corolissally	595d91c5b8bc5d54d0957d0a
█	██████████	████████████████████
█	██████████	████████████████████
█	██████████	████████████████████
█	██████████	████████████████████
11	fujaiyanli	5b066676c721a914acf89cfc
█	██████████	████████████████████
13	happydeer	592e352f6fffc76b617d55ce
14	HFDS2017	58bd18c881cd4b5269dcb22b
15	Hicherry	56f8d9fe796b2f589b96a387
16	hongmei store	58ba65193cee5052a6754733
17	HQhuangL	58be263c7089df52945ec75a
18	JOLL	5d502e7a1527547edbad504d
█	██████████	████████████████████
20	minsdeal	5a421f4c87c25b70c1122d9d
█	██████████	████████████████████

<b>Defendant No.</b>	<b>Defendant/Store Name</b>	<b>Seller ID</b>
22	MYDC	589ac0cf396f39509689b133
■	■	■
24	quemeige	5b30511d337afb6439eb5ed6
25	REDLIU	5b91d07e6c62af49fb12f823
26	renxinstore	5a5d9e017276532645020439
■	■	■
28	SHXK	57280df53a698c7be7e3d3bc
■	■	■
■	■	■
31	wonbubu	5a096b61e65033699e2c00e8
■	■	■
33	xijinjin123	58fdc94d5a2c91117d583dd
■	■	■
35	zhangyuting	58d7d0b8c430d85372ebd087
36	zhengruilan	58cfdc99225295056b23305
■	■	■
38	zhouzhongren	58e8aa549d883a158792495f
■	■	■
40	appleooqw Store	4992463
41	City spray Store	5112048
■	■	■
■	■	■
44	Eathevin Store	5046244
45	Esportes Store	4811026

<b>Defendant No.</b>	<b>Defendant/Store Name</b>	<b>Seller ID</b>
46	Extreme crossing Store	5008317
■	████████████████████	████████
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■	████████████████	████████
■	██████████████	████████
51	HandsomeBoy Store	5125103
■	██████████████	████████
53	HOMO dropship Store	5008322
■	██████████	████████
55	Lenzero Store	4808144
■	██████████	████████
57	Loveliness Jewel Store	2956076
58	Magical Life Store	3248077
59	MAGORUI AR Store	4404113
60	Nine Suns Store	5107092
61	OuRui outdoor hunting Store	5129052
■	████████████████	████████
■	████████████████	████████
64	OutDooree K Store	4420112
■	██████████████	████████
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■	██████████	████████
68	Pinellia outdoor Store	5005261
69	Respect Store	2947059

<b>Defendant No.</b>	<b>Defendant/Store Name</b>	<b>Seller ID</b>
█	████████████████████	██████████
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72	SnugLan Store	5003133
█	████████████████████	██████████
█	████████████████████	██████████
75	WENY Store	4700002
76	ZJBeauty World Store	4801023
77	ZX Qianduoduo Store	3048016
█	████████████████████	██████████
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**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