

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

TALISMAN DESIGNS, LLC,

Plaintiff,

v.

AHAPPYDAY, *et al.*,

Defendants.

Civil Action No. 20-1915

**(Judge Colville)**

**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**, 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 \$2,150,000.00 against each individual Defendant as listed on Schedule A except Defendant Nos. 1 and 124 against which Plaintiff seeks \$4,000,000.00<sup>1</sup>, 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.

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<sup>1</sup> For Defendants 1 and 124, damage awards in the amount of 4 Million Dollars because they have both unfairly competed (\$2,000,000.00 admitted damages) and also counterfeited (\$2,000,000.00 in counterfeit statutory damages) but are not accused of the additional act of copyright infringement.

Respectfully submitted,

Dated: January 14, 2022

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