

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

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

Plaintiffs,

v.

SYARME, *et al.*,

Defendants.

Civil Action No. 20-1384

(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** hereto, all of whom are in default.¹ The grounds for this Motion are set forth in the accompanying Memorandum in Support. This court has previously granted default judgment for the Plaintiff under similar facts in *Gorge Design Group, LLC v. Accessmall*, No 19-cv-1454 (W.D. Pa 2022) (Stickman, W).

Plaintiffs respectfully request the following relief against Defendants: 1) the entry of a final judgment of \$2,000,000.00 against each individual Defendant as listed on Schedule A 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

¹ On January 28, 2021, Plaintiff filed its Request for Clerk's Entry of Default against the Defendants listed in Schedule A and which has now been entered.

to Plaintiff. A proposed Order granting the relief sought is submitted herewith.

Respectfully submitted,

Dated: April 18, 2023

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