

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

PAWESOME PET PRODUCTS LLC, *et al.*,

Plaintiffs,

v.

COLORFLOWERS, *et al.*,

Defendants.

Civil Action No.

22-629

(Judge Hornak)

**MOTION FOR ENTRY OF DEFAULT JUDGMENT AND PERMANENT
INJUNCTION¹**

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;² 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

¹ This motion for default judgment does not fully dispose of all the claims against all the Defendants. Pending is a motion to set aside default filed by Defendant Kingworaus, thus Plaintiffs have not included this Defendant in the motion for default judgment. Plaintiffs acknowledge that they may be required to move separately to include Defendant Kingworaus in the event the pending motion to set aside default is denied.

² Plaintiffs hereby waive attorney's fees.

entered a Default Judgment and Permanent Injunction in the related cases of *Doggie Dental, Inc. v. CDOFFICE*, No. 22-629 (W.D. Pa., February 22, 2022(Hornak, CJ)) and *Doggie Dental, Inc. v. Avantdigital*, No. 22-1063 (W.D. Pa., February 22, 2022) (Hornak CJ), *Doggie Dental, Inc. v Ahui, et al.*, No. 19-cv-1627 (W.D. Pa., Sept. 27, 2021) (Hornak, CJ). The text of this Proposed Judgment is identical to the orders entered in those cases except Schedule A (identifying the defendants in this case) and B (identifying the accused product types) and the named Third Party Service Providers in Part IV. Also, since this motion does not dispose of all the claims against all the Defendants, the Proposed Judgment orders that the bond remain in place.

Respectfully submitted,

Dated: April 26, 2023

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

courts@ferencelaw.com

Brian Samuel Malkin

Pa. ID No. 70448

bmalkin@ferencelaw.com

FERENCE & ASSOCIATES LLC

409 Broad Street

Pittsburgh, Pennsylvania 15143

(412) 741-8400 – Telephone

(412) 741-9292 – Facsimile

Attorneys for Plaintiffs