

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

PAWESOME PET PRODUCTS LLC, *et al.*,

Plaintiffs,

v.

DREAMBLISS STORES, *et al.*,

Defendants.

Civil Action No.

22-1584

(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 cases of *Doggie*

¹ Plaintiffs hereby waive attorney's fees.

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.

Respectfully submitted,

Dated: May 2, 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