

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)

**[AMENDED] MOTION FOR ENTRY OF DEFAULT JUDGMENT AND PERMANENT  
INJUNCTION<sup>1</sup>**

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 [ECF No. 147].

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;<sup>2</sup> 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

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<sup>1</sup> This amended motion for default judgment is intended to dispose of all the claims against the remaining defaulted defendants. Previously, Plaintiffs filed an identical motion [ECF No. 145] and [ECF No. 146] and intentionally excluded Defendant Kingworaus from Schedule A of the proposed default judgment because that defendant filed to vacate the default entered against it. The Court having now denied the defendant Kingworaus' motion to vacate default [ECF No. 153], Plaintiffs now file this amended motion that includes defendant Kingworaus, and now incorporates Kingworaus in the list of Defaulted Defendants referenced in the Memorandum in Support [ECF No. 147] and the Declaration in Support [ECF No. 145-2]. An appropriate amended [proposed] default judgment if filed herewith.

<sup>2</sup> Plaintiffs hereby waive attorney's fees.

and transfer of Defendants' frozen assets to satisfy the damages awarded to Plaintiffs.

An appropriate Amended [Proposed] Judgment is filed herewith. The Court previously 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 Amended [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. Since this Amended Proposed Judgment dispenses of claims against all the remaining non-terminated defendants, the Proposed Judgment also includes an Amended Schedule A and release order for the bond in this case.

Respectfully submitted,

Dated: July 10, 2023

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