

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

MSR IMPORTS, INC.,

Plaintiff,

v.

GLOBAL GOODS, *et al.*,

Defendants.

Civil Action No. 23-2133

**(Chief Judge Hornak)**

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

In accordance Federal Rule of Civil Procedure 55(b)(2), Plaintiff respectfully submits this Motion for Default Judgment and Permanent Injunction against the defaulting Defendants set forth on Attachment “A” (hereinafter collectively referred to as “Defendants” or individually as “Defendant”)<sup>1</sup>. The grounds for this Motion are set forth in the accompanying Memorandum in Support.

Plaintiff respectfully requests the following relief from the Court: (1) a damage award of 150,000.00 against each individual Defendant, severally and individually, as listed on Schedule A for their copyright infringement (2) a post-judgment asset restraining order, and an order authorizing the release and transfer of Defendants’ assets from the Third-Party Service Provider(s) and Financial Institution(s) to satisfy the damages, in whole or in part, awarded to Plaintiff, and a (3) permanent injunction in order to prevent Defendants from infringing Plaintiff’s intellectual property rights in the future. A proposed Order granting the relief sought is submitted herewith.

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<sup>1</sup> This motion does not include all the Defendants in the case. Some of those Defendants have not been defaulted because they are either negotiating a settlement or have an extension to file an Answer. Those Defendants have been omitted from the current Schedule A.

Respectfully submitted,

Dated: March 4, 2024

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