

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

PAWESOME PET PRODUCTS LLC, *et al.*,

Plaintiffs,

v.

LV LIANG KITCHENWARE STORE, *et al.*,

Defendants.

Civil Action No.

24-cv-905

(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 default judgment does not dispose of all the claims against all of the Defendants. Several are still in negotiations or in active litigation and have not been defaulted. These Defendants are not included in the Schedule A for this motion.

² Plaintiffs hereby waive attorney's fees.

entered a Default Judgment and Permanent Injunction in the related cases of *Pawesome Pet Products, Inc. v. Dreambliss Stores, et al.*, No. 22-1584 (W.D. Pa., November 14, 2023)(Hornak, CJ)(ECF No. 96); *Pawesome Pet Products, Inc. v. Cutebear Store, et al.*, No. 22-1063 (W.D. Pa., November 14, 202)(Hornak, CJ)(ECF No. 104); *Pawesome Pet Products LLC v. Colorflowers, et al.*, No. 22-629 (Hornak, CJ)(ECF No. 180); *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. Plaintiffs are not aware of any overlap in the identity of the defendants in the prior case and the current case. Further, the sales periods for the current defendants do not overlap with the sales periods for the prior case. In short, there is not duplication of defendants or time periods based upon available information.

Respectfully submitted,

Dated: August 28, 2024

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