

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

ALLSEASON ENTERPRISES, LLC,

Plaintiff,

v.

ROUTES ENTERPRISES, *et al.*,

Defendants.

Civil Action No. 25-cv-27

(Judge Colville)

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

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”). 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, against each individual Defendant, severally and individually, as listed on Schedule A for statutory damages (of \$150,000.00 multiplied by the number of copyrighted words infringed) for their intentional copyright infringement and disgorgement of admitted profits (\$2,000,0000.00) for their unfair competition, calculated as follows:

Defendants 4 and 8 (\$2,150,000.00)(infringing one work);

Defendants 28, and 50 (\$2,300,000.00)(infringing two works);

Defendants 5, 14, 26, 29, 34, 44, 52, 53, 58, 59, 60, 64, 68, 75, 87, 98, 100, 121, 131, 136, 137, 138, and 139(\$2,450,000.00)(infringing three works);

Defendants 9, 11, 16, 20, 25, 30, 32, 36, 39, 46, 48, 57, 61, 77, 89, 104, 110, 111, 116,

¹ This motion does not dispose of all the claims in this case since some of the defendants have not yet been defaulted or are continuing to negotiate with plaintiff. These defendants are not included in the attached Schedule A for the motion. In the event a settlement is not completed, the plaintiff will file a motion to amend to dispose of the remaining claims.

129, and 144 (\$2,600,000.00)(infringing four works);

Defendants 2, 3, 12, 17, 18, 19, 24, 40, 47, 49, 65, 66, 73, 78, 80, 92, 95, 97, 101, 102, 106 and 120 (\$2,750,000.00)(infringing five works);

Defendants 15, 35, 37, 55, 67, 69, 70, 71, 79, 81, 83, 90, 91, 94, 108, 109, 114, 122, and 145 (\$2,900,000.00)(infringing six works);

Defendant 43 (\$4,600,000.00) (infringing four works) and statutory trademark counterfeiting; and

Defendants 54 and 86, (\$4,750,000.00) (infringing five works) and statutory trademark counterfeiting.

(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.

Respectfully submitted,

Dated: March 19, 2025

/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 Plaintiff