

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

JEFF BARTELS,

Plaintiff,

LIUDOUJIANGSHOP, *et al.*,

Defendants.

Civil Action No. 25-cv-934

Judge Bissoon

**MOTION FOR ENTRY OF DEFAULT JUDGMENT, PERMANENT INJUNCTION
DAMAGES AWARD, AND TRANSFER OF FROZEN ASSETS**

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 as set forth on Schedule “A” (hereinafter collectively referred to as “Defendants” or individually as “Defendant”). Some of the Defendants have settled and the claims against them will be dismissed. The grounds for this Motion are set forth in the accompanying Memorandum in Support of Default Judgment.

Plaintiff respectfully requests the following relief against Defendants: 1) the entry of a final judgment of statutory damages of one hundred-fifty thousand dollars (\$150,000) against each individual Defendant as listed on Schedule A for willful violation of the Federal Copyright Act; 2) injunctive relief prohibiting each Defendant from further infringing Plaintiff’s copyrights and ordering that each Defendant destroy all unauthorized copies; 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 Plaintiff.

A proposed Order granting the relief sought is submitted herewith.

Respectfully submitted,

Dated: November 11, 2025

/s/ Stanley D. Ference III

Stanley D. Ference III

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CERTIFICATE OF SERVICE

I hereby certify that on November 11, 2025, the foregoing document is being filed via the Case Management/Electronic Case Filing (CM/ECF) system; I also certify that on the same day, a true copy of the foregoing is being served in accordance with the Order Authorizing Alternate Service.

/s/ Stanley D. Ference III

Stanley D. Ference III