

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

EVGENY LUSHPIN,

Plaintiff,

v.

HONGSHENGGONGCHENGJIXIE, *et al.*,

Defendants.

Civil Action No.

25-cv-1015

Judge Wiegand

MOTION FOR DEFAULT JUDGEMENT

In accordance Federal Rule of Civil Procedure 55(b)(2), Plaintiff respectfully submits this Motion for Default Judgment against the defaulting Defendants set forth on Amended Schedule “A” attached hereto. 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 statutory damage award of \$150,000.00 against each individual Defendant, severally and individually, for its intentional copyright infringement; (2) an order authorizing the release and transfer of Defendants’ assets from the accounts frozen by this Court’s previous orders to satisfy the damages, in whole or in part, awarded to Plaintiff and requiring the payment of future amounts paid into each Defendant’s accounts until the judgment against that Defendant is paid in full; and a (3) permanent injunction preventing Defendants from infringing Plaintiff’s intellectual property rights in the future. A proposed Order granting the relief sought is submitted herewith.

Plaintiff does not believe it is necessary for the Court to hold a hearing on this Motion, and the Motion may be decided on the papers. Courts in our district have entered default

judgments in similar cases based upon the papers and without holding a hearing. *See Osprey, LLC v. Alfie Pet*, No. 21-cv-790 [Doc. No. 43] (W.D. Pa. July 28, 2022) (default judgment entered without a hearing); *Osprey, LLC v. Alladinbox*, No. 21-cv-1095 [Doc. No. 39] (W.D. Pa. July 21, 2022) (same); *BBC Studios Distribution Ltd. v. The Partnerships and Unincorporated Associations Identified on Schedule "A"*, No. 22-cv-1441 (N.D. Ill. July 20, 2022) (same); *Airigan Solutions, LLC v. Belvia*, No. 20-cv-284 [Doc. No. 35] (W.D. Pa. April 22, 2020) (same). Court in other districts have also entered judgment without hearings. *See, e.g., Apple Corps. Limited v. The Individuals, Partnerships and Unincorporated Associations Identified on Schedule "A"*, No. 19-cv-62853 (S.D. Fla. Feb. 13, 2020) (default judgment entered without a hearing); *Chanel, Inc. v. The Individuals, Partnerships and Unincorporated Associations Identified on Schedule "A"*, No. 19-cv-61416 (S.D. Fla. Aug. 12, 2019) (same).

Respectfully submitted,

Dated: October 31, 2025

/s/ Stanley D. Ference III

Stanley D. Ference III

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Schedule “A”
Defendants with Store Name and Seller ID

Defendant Number	Store/Seller ID	Seller ID
1	HongShengGongChengJiXie	AUISF4AII4IAG
2	tongbaixianmengyushangmaoyouxiangongsi	A1L2ZTGRLBR2B1
4	Qingdao yi mu liang cha dianzi shangwu youxian gongsi	A6SJX578DGCVI
5	HeJinHengAnGongChengJiXieYouXianGongSi	AADB04MV60BDJ
6	xianyoujingyupinmaoyiyouxiangongsi	A2XLI2W7UZJFHO
7	HUIQING1	A2XUFTR4RN8K6G
8	gaopingshishuixinshangmaoyouxiangongsi	A2374IJYTHZWQK
9	qingyong666	A2TO7CBD5RSL7C
10	xianninglanyong	A2UWJ0M9LXTI50
11	Silver_Core	A64RQ5F0PLJAY
12	xiangyueyanxuan	AY9BP6TP5DO7K
13	oPesaDirect	A17S1YNBJ2I4E4
14	ganlicheng1212	A2M8WTJAQ59DHV
15	FF Art Decor	634418219563021
16	LONGQIFEIYANG	634418218101681
17	SZ Art Deco	634418219577199
18	Dream Freedom First	634418219736797
19	YAOYAOMA	634418219037285
20	Preferred mural one	634418219848580
21	WWtemus	634418219633918
22	ArtOnCanvas	634418218762296
23	One Meter Gallery	634418220055958
25	Canvas Of Dreams	634418219333753
26	HH temus	634418219628292
27	E ART Canvas painting	634418220209573
28	FF WALL ART	634418219456080
29	Building a base period	634418219679621
30	Rcreek Decorative Art	634418219617603
31	Ornaments II	634418219259172
32	PaintedCanvases	634418218762288
33	Decorative Figure	634418218866498
35	QQ zhihzi	634418219458784
36	XX Art Decor	634418219562076
37	Pawsitive Vibes shop	634418219592485
38	Mr Li painting	634418219767106
39	U Outstanding ART	634418218753057
40	D The art of beckoning	634418218306991
42	DreamHomeB	634418219792072
43	Guoh Trading	634418219818283
44	Yihang Trading	634418219660346

45	Encourage art shop	634418213806754
46	Art Deco of Diversity	634418219237103
47	Custom Wall Artistry	634418219573771
48	AGSDX	634418218940541
49	Anan decorative painting	634418219510431
50	Snow Elf Trade	634418219715965
51	Canvas Trade	634418220055642
52	QW Art Deco	634418219577088
53	LL Art Decor	634418219560917
55	HOPE THE STARS	634418219489798
56	ZL Art Decor	634418219577525
57	PX Art Decor	634418219503088
59	ye Art	634418219315679
60	ZEKVK	634418216082208
61	Johns love shop	634418218685504
62	Gosh Shop	634418219635185
63	LOLUNSS	634418215041494
64	JX Art plate	634418219110421
65	CreativeBadges	634418220401342
66	AEGFK	634418215579697
67	CCMALL A	634418216712223
68	QIN Art Gallery	634418220520269
70	WANGSANSAN	634418218186038
71	Gooseberry Manor Art	634418218751504
72	Frame Fusion Intl	634418219145817
73	Cool self	634418218152110
74	Chromatic Creations	634418219762375
76	Sereincl ART	634418218752422
77	DEE Decorative painting	634418217807864
78	MS tipsy	634418221663947
79	Mio Decorative painting	634418216076054
80	The Pinnacle Of Art CC	634418220891480
81	Lan Yue poster	634418221487764
82	Art Works Museum AAA	634418220856574
83	FuDao Home Furnishing	634418217659510
84	Artistry Haven AA	634418221214360
85	painting by number	129454772767
86	decorative painting for home ko	634418215049521
87	YouLoveM	634418218278676
88	Paint by numbers	634418214055060
90	Dww Art Poster	634418220206474
92	diary poster	634418221323606
93	YUAN PAINTS	634418220667690
94	LYLL	4669803499141
95	FNT Decorative painting	634418218149310

96	WKHBB	634418219555747
97	The Seven Lives	634418220449605
98	Starry fantasy ART	634418218343999
99	J Pattern Painting	634418218148183
100	arrebolcl ART	634418218752860
101	J Artistic beings	634418218072867
102	C Grateful Decorative painting	634418218150225
103	Happy Decorative Painting	634418218213022
104	C Happy Decorative Painting	634418218237823
105	painting house ART	634418218541695
106	Peinture dcorative Affiche	634418219560086
107	Banana Painting Shop	634418218757973
108	Grateful Decorative painting	634418218028065
109	FJWWW	634418221097225
110	Sunbleached Palette	634418221100703
111	Love and sunshine	634418217977150
112	Ling LL	634418215124800
113	XQYNAA	634418219963114
115	Lucky MinO	634418217415431
116	PY F Canvas Shop	634418219076481
117	Xinyue Art	634418218143619
118	Modern Craftsmanship	634418216217922
119	MaxRenard Game	18596444047
120	Paint by Numbers Diamond Paint	634418214074887
121	Inspired wall art painting	634418217380751
122	ARES Decorate	634418218089267
123	Livey	634418219018877
124	Slow life painting art	634418218479517
126	Dream Edge the best canvas	634418219187600