

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

JANET BROXON,

Plaintiff,

v.

QANSI, *et al.*,

Defendants.

Civil Action No.

25-cv-924

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

Pa. ID No. 59899

courts@ferencelaw.com

FERENCE & ASSOCIATES LLC

409 Broad Street

Pittsburgh, Pennsylvania 15143

(412) 741-8400 – Telephone

(412) 741-9292 – Facsimile

Attorneys for Plaintiffs

**Schedule “A”**  
**Defendants with Store Name and Seller ID**

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
1	Qansi	A3A1QWT62AZ69J
3	DONGWIN	A2GN7GVTKQJEUC
5	chengdusenyuqishipinyouxiangongsi	A3FCS2SZSL6868
8	RXDIJNIWU	102489613
9	Uikceten	101657156
10	SUNGGOKO HOME	101609790
13	Jingzi Co., LTD	101639641
16	Zhonghui Co., LTD	101632371
17	SONGXIANG	102514463
18	yhgenq	101672376
20	XDXSSM	101584272
22	piaybook	101501112
25	Sunhillsgrace.Co. Ltd	101225422
26	Home Decoration	101649058
29	Purowzwe	101591709
35	Bathtowel boutique	634418212653139
36	Low price good products	634418217435678
37	PINK CREATIVE	634418218911493
40	FitStar	634418219908021
41	Little Tomato Household Produc	634418211099573
42	Red Cat Home Decorationn	634418218261017
43	LIUHAOWEI	634418219077074
44	LIUSHUXIA	634418218567837
45	Jenny Creative Home Furnishing	634418213008474
47	Home Furnishings CC	634418211776461
48	These feverish pleasures	634418213742649
49	sukeke	634418211973632
50	DWsixsixsix	634418220398338
52	XYulian	634418219037032
53	LONIA	5637247442904
54	Awesome Selection - li aesthetics	2159452965572
55	Ibaozhen	634418218915146
56	BVBareA	634418220219981
57	ZeroBlanket	634418219716998
58	YouKtwo	634418219920530
59	Paul li	634418214382926
61	BvfBat	634418220226047
62	CustomChic	634418217271408
63	WTY GJ	634418218461032
64	DistinctTee	634418218562507

65	kingers	634418219583677
66	Jusepan	634418218299351
67	Masonfd	634418218622089
68	Good quality clothing and good seller	634418219841823
69	Tee Workshop	634418219345462
70	A plus D clothing	634418220171855
71	Rongxi home	634418218935366
72	RetroDesign HOME	634418218854063
73	XMMAT Fation	634418218264843
74	Aurelix	634418220978447
75	Soft Cove rest X	634418221053675
76	Outdoors Goods Outlet Shop	634418211812263
77	Transcend Victory Shop	634418212016545
78	Life sticker shop	634418218939604
81	Luyuan Art	634418219038246
82	Funny Metal Sign	634418218748650
83	Matdaone	634418218281155
84	Wusunday	634418219920389
85	Love DIY Su	634418219596307
86	Xmxltwo	634418219678450
87	Wall Art Sign	634418221760060
88	YYXshioping	634418211085304