

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

NONA IONELA PUICĂ,

Plaintiff,

v.

SHANXISHASIJINKEJIYOUXIANGONGSI,
et al.,

Defendants.

Civil Action No.

25-cv-1094

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 Name	Seller ID
1	shanxishasijinkejijouxiangongsi	A2EQ3G8Z7CB53G
2	ShiChiSiWenSanaoYuXiaGongSi	AXQKA39IHXTFV
3	yiwushidiaoqidianzishangwuyouxiangongsi	AB3JM68IP557K
4	Yiwu shi fang long shangmao youxian gongsi	A1IHF03VZTUMSV
5	HaErBinHuangXiShangMaoYouXianGongSi	A1R48UOC7LZ1IR
6	guoliangsh	APRJTYNYJMMJQ
7	LianYuanShiYiTongLaoWuYouXianGongS	A12FE0A31CVF79
8	khgkuig	A1FYNGQA3KSJ6A
10	YongFuJianZhuLaoWu	A18KN812V9G82
15	Art679 Gallery	A3HCG7KQ9RX9ZX
25	poyangxianxinchenhulianwangchanyefazhandian	AR1BCB6I9643B
26	CJX Store	A1SWMZ7PHW69RV
34	LAIQNSHOPAA	A2LYRS98UHC5O7
35	hsnzbshxgdvdfs	A2VTPJWJ0T7PMS
36	KunGuN	A2X28OT01AG2FR
37	yangsenghjfgfh	A24MZAHSCEFAID
40	Wonderful Nov	A2QHJQ72DO8KOW
41	zhijiangshiwaishangshangmaoyouxiangongsi	A1NYNRMUFE8RA8
42	chengdushihuayuetengmaokejizhongxingerendu	A3NULXLHBLQF3M
44	EX ZAO	A3ENO4R7W1ZDRB
47	Meijiaduodianzishangwuyouxiangongsi	A3MWNPUKYX72YS
49	You & Me SSS	A1NPWR8TUUXNXQ
54	Cfeclog	A172869TO91R0Y
63	THE HIDANE	A1GWE31CYWDCQ
65	lfortunate	A1K7VT7MYYYCAR
75	AISENSI	A1LKC8X95Q3IVP
76	Yiizy	A1EN35SV8MNNQCF
78	YuerHealthy	A1TCNIWE7ZJGE8
80	-A&O-Projekt-GmbH-	A1DS7HVKFWEDZO
83	Fansipro Direct	A3R0ZQOZOSLXD2
94	Jusajusalo	A1QI3TLCSSNOTBD
112	LEMORRY	A24XG49AQBBDGKH
119	Xiang Ming Shang Mao	A315AYYELB2DAN
121	hua98	A3673K27RB2COF
126	License Plate Store	A2B7O3ANUI2DKA
128	dasluff	101694152
129	ZhangYouQing	102490153
130	SpreadHoldings	101586311
131	JDQZM store	101509101
132	Wang market	102630564

133	shengshengdianzi	101084173
134	Risegun	101237170
135	Jili shop	634418211252190
136	XingGangPi	634418220284289
137	YDSTP	634418220317792
138	BoKaii	634418219942289
139	one for rose local	634418219839244
140	Qing Dong	634418220330539
141	XYTP	634418219976349
142	Yao Pin Hui	634418219597620
143	JQWTP	634418220318191
144	DSTP	634418220297724
145	LYA D GETI	634418220316197
146	CMJBAOKUAN	634418220026981
147	LJXTP	634418220347834
148	ME HAO	634418218364330
149	Hey accessories	634418220204748
150	Retro Art Gallery	634418214497725
151	CLJBAOKUAN	634418220026871
152	Xiu Mu	634418219952244
153	CWJ D GETI	634418220344274
154	Soulful Frames	634418220061310
155	WMS GETI D	634418220356407
156	LXF A GTH	634418220370996
157	LYA E GETI	634418220316259
158	A Nice Pretty Shop	634418219788811
159	LXF B GTH	634418220371002
160	LXF C GTH	634418220371007
161	CWJ C GETI	634418220344124
163	YiYaYiYaYo	634418216542242
164	Nordica Art Decor	634418210991444
165	Art Master	634418218091897
167	Wall Art QQT	634418218394228
169	Blue Sky Local	634418215940516
171	Mais Bag	634418217691020
172	Shang Shen	634418217330401
173	BUCN	634418218808539
176	Product Outlet Shop Vintage	634418211968237
177	PJM JM	634418212106613
178	JoyWild	634418219025881
179	DONGTAOYYY	634418219617544
180	Yi Tao Jia Fang	634418218192391
181	HuLY	634418218341963
182	TANCASE	15127388742
183	Protective Case	634418215693995

184	SafeKeys	634418219885716
185	Lezhong Mall	634418215693816
186	CaseCraze	634418217225006