

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

EVGENY LUSHPIN,

Plaintiff,

v.

CHUZHOUQINTIANWUJINYOUXIANGONGSI,
et al.,

Defendants.

Civil Action No.

25-cv-905

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	ChuZhouQinTianWuJinYouXianGongSi	A348C1S2HA4K1Y
2	Ji xia jingying bu	A2MRBCOWOEMKU
3	xianyouyanzaichenmaoyiyouxiangongsi	A24YEIS8XU22GC
4	LINJINZHONG	A2JBIQIXN3QBXN
5	Phaeton decorative painting	A27GAT69OJEP5
6	songsongjingqi	A2R3W55S6LGYV9
8	fufu art	A3DCGIRY41CNJ3
10	Xiao Zhou Decorative paintings	A1BYV2C3PEAZZL
11	YBHUIYUAN	A1FKI32CUZ3CV
12	linyuning2024	A2FENJG6VN836D
13	fanmangengmaoyiyouxiangongsi888	A3FF6DHX370294
15	NengXiZhuangShi	A1GSU07FRREHRU
16	JOYMOE STORE	A27GTEAWQD3MW8
17	bling art	A2FC9XD04IWAHQ
18	hangzhoufuyangcaihongdayaofang	A2DGL9AIIHRRBJ
19	Luoshiqi	AZ65OBWQL0BWM
20	CARRYDONE	A1HF7QP9EN1K6L
22	xinghong QW	A1PZ3PZ4KWODWD
23	guangshuishiyunxuyanshangmaoyouxiangongsi	A123FZ19E7VF3D
24	Kungfu Alien	A12US0RS62AMUQ
26	liyuxiangdsajifajksfhnauisfnaisjfsasf	A33MDNRN4QLBJ8
27	TanHaiBo79	A2CMZ4P0HGMZ9K
28	Meishaonvzhanshi - shop	AARDPONHKUS0Q
29	GULUSHOP	A3VXG017Y03DMZ
31	jia yi Decompression poster	A1PXSKPEGQCOGG
34	zhedie art	A26K8KUFL3Y1K7
35	Hu shaohua	A1RJHK0RMAYNG6
36	Yiwu shi shou ha shangmao youxian gongsi	A32HJ7KAN7YEK4
38	VTYH Posters Store USA	A3SZ648PMM16RN
39	kunmingmohuashangmao	A1KG61OYO9CGG0
40	Ediximi	A80SJXWY8SN6B
41	shanyinxianjiafenshangmaozhongxin	A1AMI9GU3S53VJ
42	xiang art shop	A3AIZSHNIZDNBF
43	ZHIMIN Art	AXY9TX5Z65DJG
44	ZHENGDEBIN ART	A8JRRFAHDOQN8
45	xianyouxianyuexiugemaoyiyouxiangongsi	AMSGGZEM8MV12
46	kaiyuniubi	A2S3CUIXR58EEU
47	li jian Link poster	A1DGJKPFN3Z5PA
49	Liqingshuang	ATQVC9YSD5D86
50	sale RuHuiShiJia	A352M50A8G3G0K

52	YIGIT DOGUKAN ABUT	A2VNYLSB3X5RBS
53	zhen ying Causal poster	A2KQ24K21PGJQQ
55	Qi hao maoyi	A32TAD5G4TY8GG
56	huangfoping	A3C1ZXBA10UNMW
57	chenguo hong668	A9AL79SW82UT7
58	linxiuminghaibao	AKK0MUHKPX61M
59	sudihong2024	A2SFC4YVQ36PTZ
60	weijia2024	A1YEFO9JEUK5VL
61	jianfenposter	AOL5BSSOWZ3NA
62	lianyuanping	A15Y1TOABVZTAV
63	jishanxianjinglingmaoyiyouxiangongsi	A251JTMIH6ATUO
64	xianyouchenghuiyuemaoyiyouxiangongsi	AS78V3T7LQHS4
65	wangshiyel12233	AHK75BGDXBGT7
66	cqian753	A18KRGBLZBB0NA
68	AE6TP8D1R	A323S2O89TB7EB
69	AEB0U3M3F	A1DQHVTVYRPODJ
70	ZJIANZHONG	A1DT0ITD4OGP1X
71	gongxiami	AMLUARSGI16CI
72	LIZUOLIN	A237518R4N2YG7
74	XinYiHaoAA	634418220403773
75	Urban Metal Decor	634418219005037
77	Art Deco sign I	634418218352266
80	ycanvas	634418216640987
81	IronWhisper Gallery A	634418220288472
82	MetallicMuse Artworks B	634418220290643
84	baobao poster	634418217281973
85	HD ART SHOP	634418219081116
87	David wangg poster	634418216379476
88	SuSu Art Shop	634418218263026
90	AUYOYO	634418219748787
91	CanvasCraft	634418218762262
93	Feel Cool Poster	634418219330140
94	Festive decorations A	634418219418888
95	GING WALL ART	634418215424132
96	Sky Art Decor Prints	634418218590480
97	Lucky HomeB	634418219961259
98	Sea Crafts	634418215270644
99	A High decorative painting	634418218332270
100	Hanging print KA	634418217781663
101	K Sincere Decorative painting	634418218141004
103	Baby Poster	634418217281823
104	WY Crafts	634418214483358
105	XCGONGYI	634418212234629
107	MYsee	634418217685848
108	starry sky painting	634418212241665

110	Prevent Special	634418214106731
111	G High decorative painting	634418218332407
112	H Sincere Decorative painting	634418218137106
113	painting by number H	634418211156037
114	Youmi Diamond Painting	634418215670905
115	N Fast decorative painting	634418218243264
116	C Aio decorative painting	634418218076243
117	Youjing Art	634418219356149
118	SHY ART	634418218210083
119	Lucky HomeO	634418219620070
121	YOUBIN ART	634418220797552
122	CTY Decorative painting	634418218149065
123	Want poster	634418220816302
124	CRT Decorative painting	634418217976381
125	MMPainting SHOP	634418220227945
126	KTYC Painting SHOP	634418220227610
127	E Loi decorative painting	634418218076344
128	snake scorpion	634418215991537
129	Kelly Home Art Decor Room	298007712227
130	Brother Bathmate	5462285884145
132	Foya Decorative painting	634418216076175
133	MOILY Decorative painting	634418216124433
134	BZDW	634418214299315
135	Decorative art posters	634418214202581
136	Silver Stream Wall Art	634418219038314
137	WY SI Hd Photo Shop	634418219113177
138	YUG Decorative painting	634418217976635
139	CTY Painting SHOP	634418220227243
140	B High decorative painting	634418218332288
141	EOC shop	634418212804729
143	Xinchen Crafts	634418221426396
144	R Art Garden	634418218125148
145	AugustinesPR	2488314016002
147	Shine Hanging Painting	634418216330758
149	HRposter	634418219164582
150	Dolphin bayh	634418219762805
151	poster lqr	634418220380125
152	KK decorations	634418220321403
153	grades	634418219658185
155	Li canvas painting	634418219512558
156	JINRL	634418219247849
157	De Quan Art poster	634418220706518
158	PTONPR PRINTS	634418219463081
159	Art Oil Painting Gallery	634418219233969
160	CHXIC	634418219477072

161	Cathy decoration	634418211361405
162	AArt Gallery	634418219836850
163	PICTUREBB	634418219692724
165	Youjing Trading	634418219356222
166	SailCanvas	634418218392789
168	delicate gift one	634418219849898
169	LI Painter Poster	634418219219347
170	Ronghuaguan	634418219762330
171	Fengshangxuan Crafts	634418217738493
172	HomeDecorativeZSB	634418219689065
173	CanvasMuse	634418219029565
174	CanvasVoyage Gallery	634418219493680
175	Picturesque ART	634418218099589
176	AI ART DECOR	634418218356515
177	WWMMLL beautifully decorated rooms	634418222278887
179	Jane Artistry Haven	634418219953311
180	yanhouse	634418217842426
181	rulerrunner	634418217949240
182	Decorative Painting Shopping	634418217927234
183	Black Hole Sign	634418216822890
184	Artful Spaces Zone	634418220061413
185	mountainhill	634418217882357
186	YUAN ARTS	634418220666661
188	YES PAINT	634418220567491
189	YES ARTS	634418220687459
190	Here Decor	634418217805353
193	Dark Arts	634418219771319
194	ArtWallFusion	634418219425049
199	Pillow Decoration guo	634418211456568