

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

BARTLEY FORBES,

Plaintiff,

v.

JINGJINGWANG, *et al.*,

Defendants.

Civil Action No. 25-cv-1494

Judge Bissoon

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: January 27, 2026

/s/ Stanley D. Ference III

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