



designation of origin (15 U.S.C. § 1125(a)), [*Id.* at ¶¶ 63-66], violation of the Illinois Uniform Deceptive Trade Practices Act. (815 ILCS § 510, et. seq.) [*Id.* at ¶¶ 67-70] and copyright infringement (17 U.S.C. §101 et seq.) [*Id.* at ¶¶ 71-85]. [D.E. 1].

7. On March 8, 2024, in order to facilitate the investigation of its claims and the identity and location of Defendants, Plaintiff moved for alternate service [D.E. 11]. The motion was granted by the Court on March 14, 2024 [D.E. 17, 18], permitting Plaintiff to serve the Summonses, Complaint, and filings in this matter upon Defendants via electronic mail (“e-mail”) and via Plaintiff’s designated serving notice website by posting copies of the same on an Internet website.

8. On March 8, 2024, Plaintiff moved for an amended motion for entry of an ex parte temporary restraining order, including a temporary injunction, a temporary asset restraint and expedited discovery. [D.E. 13]. March 14, 2024, the motion was granted by the Court by sealed order. [D.E. 17, 18]. On April 2, 2024, Plaintiff filed its *Ex Parte* Application to Extend Temporary Restraining Order. [D.E. 22]. On April 3, 2024, this Court granted Plaintiff’s motion for extension of a temporary restraining order. [D.E. 23].

9. On April 15, 2024, Plaintiff filed its Motion for Preliminary Injunction. (D.E. 27). On April 17, 2024, this Court granted Plaintiff’s Motion for Preliminary Injunction [D.E. 29].

10. The Temporary Restraining Order and Preliminary Injunction required, inter alia, third-party payment processors including, but not limited to PayPal and Amazon Pay, and their related companies and affiliates, to identify and restrain all funds in Defaulting Defendants’ associated payment accounts, including all related financial accounts tied to, used by, or that transmit funds into, the respective Defaulting Defendants’ financial accounts, and divert those

funds to a holding account for the trust of the Court. Subsequently, my firm received notice from the third-party processors that it complied with the requirements of the Court's Orders.

11. Defaulting Defendants were properly served with the Summons and Complaint on April 9 and on April 10, April 17, or April 24, 2024. [Doc. 24-26, 30, 31, 33].

12. The time allowed for Defendants to respond to the Complaint has expired.

13. To date, Defaulting Defendants have not filed any responsive pleadings to the Complaint, have not requested an enlargement of time to respond to the Complaint, nor have Defaulting Defendants entered a formal appearance pro se or by counsel on their behalf.

14. I am informed and believe that none of the Defaulting Defendants are infants or incompetent persons, and, upon information and belief, the Servicemembers Civil Relief Act does not apply.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief at the time of presentation.

Executed on this 21st day of May, 2024 at Fort Pierce, Florida.

/s/ Lydia Pittaway  
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