

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WEIFANG TENGYI JEWELRY TRADING CO., LTD)	
)	
Plaintiff,)	Case No. 1:23-cv-16785
)	
v.)	Judge Mary M. Rowland
)	
THE PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A",)	Magistrate Judge Jeffrey T. Gilbert
)	
Defendant.)	
)	
)	
_____)	

**DECLARATION OF LYDIA PITTAWAY IN SUPPORT OF PLAINTIFF'S MOTION
FOR ENTRY OF DEFAULT JUDGMENT**

I, Lydia Pittaway, declare and state as follows:

1. I am over 18 years of age.
2. I have personal knowledge of the facts set forth herein.
3. I make this declaration in support of Plaintiff Weifang Tengyi Jewelry Trading Co. Ltd's Motion for Default Judgment against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on Amended Schedule "A" (collectively "Defaulting Defendants").
4. If called upon to do so, I could and would competently testify to the following facts set forth below.
5. I am a licensed attorney and admitted to practice before the Northern District of Illinois.

6. Plaintiff filed its Amended Complaint in the instant civil action on December 18, 2023 alleging trademark infringement and counterfeiting (15 U.S.C. § 1114), [Doc. 6 at ¶¶ 44-50] false designation of origin (15 U.S.C. § 1125(a)), [*Id.* at ¶¶ 51-54], violation of the Illinois Uniform Deceptive Trade Practices Act. (815 ILCS § 510, et. seq.) [*Id.* at ¶¶ 55-58] and copyright infringement (17 U.S.C. §101 et seq.) [*Id.* at ¶¶ 59-73].

7. On January 18, 2023, in order to facilitate the investigation of its claims and the identity and location of Defendants, Plaintiff moved for alternate service [D.E. 21]. On January 19, 2024, the motion was granted by the Court on [D.E. 22, 23], 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 April 9, 2024, pursuant to the Court’s Order, Plaintiff served Defendants with their respective Summons and a copy of the Complaint by email service and website posting. [D.E. 34-40].

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

10. 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.

11. 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 31st day of May, 2024 at Fort Pierce, Florida.

/s/ Lydia Pittaway
Bar No. 0044790
Ford Banister LLC
305 Broadway - Floor 7
New York, NY 10007
Telephone: 212-500-3268
Email: lpittaway@fordbanister.com
Attorney for Plaintiff