

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 Defendant was properly served with the Summons and Complaint on April 9. [Doc. 24].

12. On May 21, 2024, Defaulting Defendant filed its *pro se* Motion for Extension of Time of fourteen days to respond to the Complaint. [Doc. 38].

13. On May 23, 2024, this Court granted the extension until June 4, 2024. [Doc. 39].

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

15. I am informed and believe that none of the Defaulting Defendant is an infant or incompetent person, 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 28th day of June, 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