

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

LEI TANG)	
)	
Plaintiff,)	Case No. 1:23-cv-16489
)	
v.)	Judge Sunil R. Harjani
)	
THE INDIVIDUALS, PARTNERSHIPS,)	
AND UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE "A")	
)	
Defendants.)	

**DECLARATION OF LYDIA PITTAWAY IN SUPPORT OF PLAINTIFF’S MOTION
FOR ENTRY OF DEFAULT AND 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 Lei Tang’s (“Plaintiff” or “Tang” hereinafter) Motion for Entry of Default and Default Judgment against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on the 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 his Complaint in the instant civil action on December 5, 2023 alleging copyright infringement (17 U.S.C. §101 et seq.) [*Id.* at ¶¶ 35-49]. [D.E.. 1].

7. On December 14, 2023, in order to facilitate the investigation of his claims and the identity and location of Defendants, Plaintiff moved for expedited third-party discovery [D.E. 7] and for alternate service [D.E. 8]. The motions were granted by the Court on December 18, 2023. [D.E. 12], 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 the Internet website appearing at the URL <https://fordbanister.com/lei-tang-23-cv-16489-ndil/>

8. On December 14, 2023, Plaintiff moved for entry of a temporary restraining order, including a temporary injunction, a temporary asset restraint, and expedited discovery [D.E. 9]. On January 12, 2024, this Court granted the motion for a temporary restraining order by sealed order. (D.E. 17). On January 22, 2024, Plaintiff filed his *Ex Parte* Application to Extend Temporary Restraining Order. (D.E. 18). On January 29, 2024, this Court granted Plaintiff’s motion for extension of a temporary restraining order. (D.E. 22).

9. On February 7, 2024, Plaintiff filed his Motion for Preliminary Injunction. (D.E. 23). On the same day, Plaintiff served Defendants with the Motion for Entry of Preliminary Injunction, the proposed order and the corresponding notice of hearing. (D.E. 23). On February 16, 2023, this Court granted Plaintiff’s Motion for Preliminary Injunction. (D.E. 37).

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. February 7 and 19, 2024, pursuant to the Court's Order, Plaintiff served Defendants with their respective Summons and a copy of the Complaint via email service and website posting. (D.E. 32, 39).

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, and the time extended by the Court has expired. (D.E. 61).

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 29th day of May, 2024 at Fort Pierce, Florida.

/s/ Lydia Pittaway
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