

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

Collectanea J. Limited,)	
)	Case: 1:24-cv-03821
)	
Plaintiff,)	Judge: Sara L. Ellis
)	
v.)	Mag. Judge: M. David Weisman
)	
The Partnerships And)	
Unincorporated Associations)	
Identified On Schedule "A")	
)	
Defendants.)	
)	

**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 Yiwu Baimei Electronic Commerce Co., Ltd.'s Motion for Default Judgment against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on 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 Complaint in the instant civil action on May 10, 2024 alleging trademark infringement and counterfeiting (15 U.S.C. § 1114), [*Id.* at ¶¶ 53-62] false 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 May 16, 2024, in order to facilitate the investigation of its claims and the identity and location of Defendants, Plaintiff moved for alternate service [D.E. 13]. The motion was granted and an Order entered on May 24, 2024 [D.E. 17], 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 May 16, 2024, Plaintiff filed its motion for entry of an *ex parte* temporary restraining order, including a temporary injunction, a temporary asset restraint and a motion for expedited discovery. [D.E. 14, 12]. The motion was granted by the Court on May 24, 2024 and an Order entered on May 24, 2024 [D.E. 17] On June 5, 2024, Plaintiff filed its *Ex Parte* Application to Extend Temporary Restraining Order. [D.E. 19]. On June 6, 2024, this Court granted Plaintiff’s motion for extension of a temporary restraining order. [D.E. 21].

9. On June 17, 2024, Plaintiff filed its Motion for Preliminary Injunction. (D.E. 22). On June 20, 2024, this Court granted Plaintiff’s Motion for Preliminary Injunction [D.E. 33].

10. The Temporary Restraining Order and Preliminary Injunction required, *inter alia*, third-party payment processors including, but not limited to PayPal , 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 June 17 and July 2, 2024. [Doc. 26-30, 35].

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

13. To date, Defaulting Defendants have not filed any responsive pleadings to the Complaint, have not filed a motion requesting 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 2nd of August, 2024 at Fort Pierce, Florida.

/s/ Lydia Pittaway
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