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

Yiwu Baimei Electronic Commerce Co., Ltd., a Chinese Limited Corporation	)	Case: 24-cv-02743
Plaintiff,	)	Judge: Sharon Johnson Coleman
v.	)	Mag. Judge: Jeffrey T. Gilbert
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 April 5, 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 April 11, 2024, in order to facilitate the investigation of its claims and the identity and location of Defendants, Plaintiff moved for a temporary restraining order [D.E. 16], alternate service [D.E. 15], expedited third party discovery [D.E. 14]. The motions were granted by the Court on May 14, 2024 [D.E. 19], 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 28, 2024, this Court granted Plaintiff's motion for extension of a temporary restraining order. [D.E. 22]. On June 11, 2024, this Court granted a second extension of a temporary restraining order. [D.E. 25]

9. On June 21, 2024, Plaintiff filed its Motion for Preliminary Injunction. [D.E. 26]. On June 25, 2024, this Court granted Plaintiff's Motion for Preliminary Injunction [D.E. 32].

10. The Temporary Restraining Order and Preliminary Injunction required, inter alia, third-party payment processors including, but not limited to Alibaba, Aliexpress, AliPay, 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 24 and July 10, 2024. [Doc. 28, 29, 33].

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 extension 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 day of August 2024 at Fort Pierce, Florida.

/s/ Lydia Pittaway
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