

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

Shenzhen Dejiayun Network Technology Co., Ltd., a)	
Chinese Corporation)	
)	Case No. 24-cv-23127
Plaintiff,)	
)	Judge K. Michael Moore
v.)	
)	Mag. Judge Marty Fulgueira
Chenxi Li d/b/a/ Spring Ocean Inc.)	Elfenbein
)	
Defendant.)	
_____)	

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

I, Lydia Pittaway, declare and state as follows:

1. I am an attorney duly authorized and licensed to practice before all courts in the State of Florida and the Southern District of Florida. I am counsel of record for Plaintiff, Shenzhen Dejiayun Network Technology Co., Ltd. (“Plaintiff”), in the above captioned action. I submit this Declaration, which is filed in support of Plaintiff’s Motion for Entry of Final Default Judgment against the Defendant. I am personally knowledgeable of the matters set forth in this Declaration and, if called upon to do so, I could and would competently testify to the following facts set forth below.

2. Plaintiff filed its Complaint on August 15, 2024 in order to combat the willful and intentional trademark infringement by the Defendant marketing, offering for sale, and advertising with Plaintiff’s federally registered BAGILAANOE trademark. (D.E. 1 at 3).

3. On November 16, 2024, Plaintiff moved for electronic service, which this Court granted on November 17, 2024. (D.E. 17), permitting Plaintiff to serve the Summons, 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.

4. On December 11, 2024, pursuant to the Court’s Order, Plaintiff served Defendant with the Summons and a copy of the Complaint via email service and website posting. (D.E. 23).

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

6. 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.

Executed the 28th of January 2025, at Fort Pierce, Florida.

Signature: Lydia Pittaway

Affiant: Lydia Pittaway