

**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-02319
)	
Plaintiff,)	Judge: Franklin U. Valderrama
)	
v.)	Mag. Judge: Sunil R. Harjani
)	
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's Motion for Default Judgment against Defendants, the Individuals, Business Entities, and Unincorporated Associations identified on the Second Amended Schedule "A" as Def. No. 183 MEDDATA GROUP ("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. On March 21, 2024, Plaintiff filed its Complaint to combat the willful and intentional counterfeiting and infringement of its federally registered trademark, which is covered by U.S. Trademark Registration No. 5,805,891 (“the Mark” hereinafter”) and its federally registered copyright, which is covered by U.S. Copyright Registration No. VA 2-330-282 (“the Long Tail Cat Image”) [Doc. 1 at ¶¶ 5-8].

7. On March 25, 2024, Plaintiff contemporaneously filed a Motion for Expedited Third Party Discovery, Motion for Electronic Service of Process, and a temporary restraining order [D.E. 11, 12, and 13 respectively]. The motions were granted and the Court entered a Temporary Restraining Order [D.E. 16], 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.

8. Defaulting Defendant was properly served with the Summons and Complaint on April 30, 2024. [Doc. 26].

9. The time allowed for Defaulting Defendant to respond to the Complaint has expired.

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

11. I am informed and believe that none of the Defaulting Defendant is not 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 11th of March, 2024 at Chicago, Illinois.

/s/ Lydia Pittaway
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