

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

AIRIGAN SOLUTIONS, LLC,

Plaintiff,

v.

BABYMOVE, *et al.*,

Defendants.

Civil Action No. 19-166

(Judge Fischer)

MOTION FOR ENTRY OF DEFAULT JUDGMENT AND PERMANENT INJUNCTION

In accordance Federal Rule of Civil Procedure 55(b)(2), Plaintiff respectfully submits this Motion for Default Judgment and Permanent Injunction against the defaulting Defendants set forth on Attachment “A” (hereinafter collectively referred to as “Defendants” or individually as “Defendant”).¹ The grounds for this Motion are set forth in the accompanying Memorandum in Support.

Plaintiff respectfully requests the following relief against Defendants: 1) the entry of a final judgment and permanent injunction by default in order to prevent Defendants from infringing Plaintiffs’ intellectual property rights in the future; 2) individual statutory damages awards pursuant to 15 U.S.C. § 1117(c) of \$2,000,000.00 against each individual Defendant, plus post-judgment interest; 3) a post-judgment asset restraining order and 4) an order authorizing the release and transfer of Defendants’ frozen assets to satisfy the damages awarded to Plaintiff.

¹ On May 2, 2019, Plaintiff filed a Request for Entry of Default against all the Defendants except Koofar. [DE 28]. On May 3, 2019, the Clerk’s Entry of Default was entered. [DE 29].

Plaintiff also requests, if deemed necessary, the Court set the matter down for hearing for determination of damages.

Respectfully submitted,

Dated: May 24, 2019

/s/ Stanley D. Ference III

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SCHEDULE "A"
DEFENDANTS BY STORENAME AND MERCHANT ID

Def No.	Store Name	Merchant ID
1	Babymove	5a0053d9448a525e05f95b61
2	BinggoHO	59b780a8776ab911b97fe10e
3	BOUCHlet	59f292f19fbc517588f33c9d
4	Clynch	59f2e8540a332a6c1cd3c84f
5	Cobre Guisante E Co Ltd	5a65563187c25b41a3b940d9
6	Drakales	5a02c731471c1473154520dd
7	Fashionw	53abb83fd91139358bc33000
8	Flyingdreamss	5a0053d9448a525e05f95b61
10	Leapon	5a04103c37f9f833f59737a4
11	Linenstoreonline889	59dde1b6dbd28202fc4a0336
12	Loverver	58aae9777584195057a197cb
13	Maternitybargains4less	582c7b5f728de64721487e86
14	PENNYMAI	5a3f4e80da6ce64e16594439
15	Poley	5a050b4437f9f81e6b0dd89d
16	Sharongoogloe9	59b8e806eea5c553061c50c9
17	Ticloy	59e9558cdc7a91139c84a7b4
18	VOTRON ONLINE, LLC	566194f756521824069d571c
19	WhileHot	5a0ffbc4149ff83ea610805d
20	Yingweiyang	5ab9fe801b98df7014c70343

CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2019, the foregoing document is being filed via the Case Management/Electronic Case Filing (CM/ECF) system; I also certify that on the same day, a true copy of the foregoing is being served via email to the e-mail addresses at which Defendants were served or via publication by posting a true and correct copy on the website www.ferencelaw.com in accordance with the February 14, 2019 Order Authorizing Alternate Service.

/s/ Stanley D. Ference III