

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

RAPID SLICER, LLC,

Plaintiff,

v.

ART-HOUSE, *et al.*,

Defendants.

Civil Action No. 19-411

(Judge Horan)

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 November 25, 2019, Plaintiff filed a Request for Entry of Default against the Defaulting Defendants [DE 30]. On the same day, the Clerk’s Entry of Default was entered. [DE 32].

All evidence supporting damages having now been filed with the Court, Plaintiff respectfully requests judgment as proposed be entered against Defaulting Defendants.

Respectfully submitted,

Dated: November 26, 2019

/s/ Stanley D. Ference III

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Attorneys for Plaintiff

ATTACHMENT “A”
DEFAULTING DEFENDANTS BY STORENAME AND MERCHANT ID

Def No.	Defendant / AliExpress Store Name	AliExpress Store Number
1	Art-House Store	2341184
2	Culcu of Store	3661109
3	EnjoyMy Life Store	4422024
4	FREEDLY Life Store	2901108
6	Innovation Painting Store	3113008
7	KingPet Market Store	2881374
8	Lauraayerre Store	4035037
9	Magical House Store	3077002
10	Manbo life Store	3190036
11	Sweet Treats	1813314
12	Sweettreats Official Store	1182793
13	TinGrace’s Garret House Store	2797002
14	Xeon Life Trading Store	2947066
15	Zone Gathering Store	3414006

Def No.	Defendant / Amazon Store Name	Amazon ASIN Number	Amazon Seller ID
16	Big-Time	B07L885G61	A3CHZUFMWYW6A1
17	Gold Happy	B07KW7XQYG	A2GPYXZWFHL3C6

Def No.	Defendant / eBay Seller Name	eBay Item No.	PayPal E-mail
21	Kanzezolstore	113419574318	tnedirect@gmail.com
22	Magnetic-a	302953543850	javicasanovaduval@gmail.com

CERTIFICATE OF SERVICE

I hereby certify that on November 26, 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 in accordance with the Order Authorizing Alternate Service.

/s/ Brian Samuel Malkin
Brian Samuel Malkin