

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

RAPID SLICER, LLC,

Plaintiff,

v.

BUYSPRY, *et al.*,

Defendants.

Civil Action No. 19-249

(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”).<sup>1</sup> 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.

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<sup>1</sup> On June 20, 2019, Plaintiff filed a Request for Entry of Default against the Defaulting Defendants [DE 32]. On June 24, 2019, the Clerk’s Entry of Default was entered. [DE 33].

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.	Store Name	Merchant ID
1	buyspry	597aaf37c7f5057fd5582f62
4	chanzon	594e136cabea91780b592536
5	daisyshop	58dba57e3af68752ad25314b
8	Honey Home	561cc46937552b5abcf896ee
9	Incoherent	5aaa9a2cccf0c86989644c3f
13	R-fer3C	58da10e43743c352cdfaf55c
14	ringsmart	54ad1facd630ed1ad698d029
15	sijifuzhuangku	5af0f49849727961ba55e10a
17	woyaobangbangde	5ac4fc66a71fbf76e68c25cb

**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