

Jason M. Drangel (JD 7204)
jdrangel@ipcounselors.com
Ashly E. Sands (AS 7715)
asands@ipcounselors.com
Brienne Scully (BS 3711)
bscully@ipcounselors.com
EPSTEIN DRANGEL LLP
60 East 42nd Street, Suite 2520
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
Attorneys for Plaintiff
Mattel, Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MATTEL, INC.

Plaintiff

v.

1622758984,1922529011, 3237063196, 3ADIANPU,
AISAITE, AJKKXIAO, ALINA_ZLL,
AMAKEUPSTORE, AMAPO, ANDREA-
LOVEKOBÉ, AT THE BEGINNING OF
LANGUAGE, BABY HI, BANGXING, BEAUTY,
OUTDOOR AND ELECTRONIC, BEBEST,
BENGBU TRADE LIMITED BY SHARE LTD,
BEST HOPE, BLUESKY588, BURNING FIRE,
BUYINFUN, C-BEAR, CECILIASTYLE,
CHERRYSTORE6, CHINA SOUL,
COCOMENGXIANGJIA, DE YANG, DIDIAO,
DREAMTOP, ELYSIAN FIELDS, FANCYBABY
JEWELRY, FANTASTIC5, FASHION MEMORIES,
FASHIONGOGOGO, FASHIONISTAS, FATE
STAY NIGHT, FATIONSHOP,
FENGJIANYU45033, FESENZ, FFBFDNDFNDRF,
FIRMTOWN94, FFPF, GEORGE ELLIOT, GN
SERVICE CO.LTD., GODEAL2017, GRACEQQ,
GUANGZHOUFENGSEWANGJUYINGHUAMA
O YIYOUXIANGONGSI, GUOJUN1991@163.COM,
HANGZHOUJINGPINBAOBAO,
HAPPYDREAM2016, HEADACHES, HELLO
BODY, HOME GOODS, HONG KONG QI SHENG,

CIVIL ACTION No.
18-cv-8821 (AJN)

HONGXIN TRADING COMPANY, HYLL2016, IFOUND, JJACKON, JOHNY PAPI, JTD, JTWAREHOUSE, JUSTICE, KÉ, KISS YOUR LIFE, LINDAF JEWELRY, LINJUBUY, LINZHIHEN, LIPENG TRADING CO., LIMITED, LITTLLOVE, LONELY PLANET, LUCK2017, LUCKY DOG8, LUCKY-1, LUSYS, LY2016, MATCHBESTCT, MEIRENYUHA, MICROHAPPYWISE, MRROBINSON, MW1023214, MY TREASURE, NANJING MH COMPANY, NEWBEAR, NEWIN, NIUQI DIGITAL FRANCHISE, ORIENT INTERNATIONAL TRADING CO., LTD., PEACH PARTY, PEGGY, PERFECT ELECTRONIC TECHNOLOGY CO., LTD, QINGDAOTIANCHANGZHENGQUANSHIYEYO UXIANGONGSI, QIPILANGZHENPISHOUBAO, RFHBTGNDERFGESDR, SAML, SAMLIR, SANDI MARKET, SHANGHAI YEE TONG TRADING CO., LTD., SHANGHAIBINJIAWANGLUOGONGCHENGYO UXIANGONGSI, SHANGHAIYEJIAJINCHUKOUYOUXIAN GONG SI, SHENZHEN NATURE MAKER, SHENZHEN SAFE TECHNOLOGY CO., LTD, SHENZHENSHIXINGJIEXUNDIANZIYOUXIAN GONGSI, SMALL HOUSEHOLD APPLIANCES CONCENTRATION CAMP, SSSDD, SUNSHINE DAY, TAMIIX, TAOLIHUA, TAOZI123, THBFDHFG, THE COSMETICS, TOP FASHION CLUB, TOP MVP, TOPFASHIONTOWN, TOXIC PERFUME, TUKIISS, UNIQUE CREATE, VSHINE, WAGPUAL TACTICAL AIRSOFT WHOLESALE HOME, WANG'S, WANGPAI, WCLOUDS, WEIWEIT, WEIWO999, WENMY, WHENEVER INTEREST, WX123456, XI LIAN, XIAOHHH, XIAOYANGO, XIAOYUPPP, XIEFANG625, XINXIANGSHICHENG6698, YANGFANSHANGMAO, YANGKAIJIE, YEHAOJJSTORE, YEMINQING, YIDAS, YIWU CITY HAOZHUO CRAFTS LIMITED COMPANY, YIWU XIANGPEI INTERNATIONAL TRADE COMPANY, YIWUSHIGUIKANGDIANZISHANGWUSHANG XING, YIWUYINHAI DIANZISHANGWUYOUXIANGONGSI, YONGYANONLINE, ZHOU DU STORES,

ZIWEIXING ANGEL AGEL ECOMMERCE LTD
and ZSDDP,

Defendants

**NOTICE OF MOTION FOR DEFAULT JUDGMENT AND
A PERMANENT INJUNCTION**

NOTICE IS HEREBY GIVEN that pursuant to the Court’s February 7, 2019 Order and in accordance with Your Honor’s Individual Rules of Practice, the Court’s Individual Local Rule 55.2(b) and Federal Rules of Civil Procedure 55(b)(2), Plaintiff Mattel, Inc. by and through its undersigned counsel, move for default judgment and a permanent injunction (“Motion for Default Judgment”) against the following Defendants: 1622758984,1922529011, 3237063196, 3Adianpu, Aisaite, ajKKxiao, Alina_zll, Amakeupstore, Andrea-LoveKobe, baby hi, bangxing, Beauty, outdoor and electronic, Bebest, Bengbu trade Limited by Share Ltd, Burning Fire, c-bear, ceciliastyle, China Soul, CoComengxiangjia, De yang, Elysian Fields, Fancybaby Jewelry, Fantastic5, Fashion memories, FashionGOGOGO, Fashionistas, Fate Stay Night, Fationshop, fengjianyu45033, fesenz, ffbfdndfndrf, Firmtown94, FPPF, George Elliot, GN Service Co.Ltd., Godeal2017, Graceqq, guangzhoufengsewangjuyinghuamaoyiyouxiangongsi, guojun1991@163.com, hangzhoujingpinbaobao, headaches, hello body, Hong kong Qi Sheng, Hongxin Trading Company, hyll2016, ifound, jjackon, Johny Papi, JTD, Ké, Kiss Your Life, linjubuy, LiPeng Trading Co., Limited, Littlove, luck2017, Lucky dog8, LUCKY-1, lusys, LY2016, meirenyuha, microhappywise, mw1023214, nanjing MH company, newbear, Newin, Niuqi digital franchise, Orient International Trading Co., Ltd., Peach Party, qingdaotianchangzhengquanshiyeyouxiangongsi, qipilangzhenpishoubao, rfhbtgnderfgbesdr, saml, samlir, Sandi Market, Shanghai Yee Tong Trading Co., Ltd., shenzhen nature maker, Shenzhen safe technology co., LTD, Small household appliances concentration camp, sssdd, Sunshine Day, taolihua, taozi123, The cosmetics, top fashion club, TOP_MVP, TopFashionTown, toxic perfume, tukiiss, UNIQUE CREATE, Vshine, wagpual tactical airsoft wholesale home, wangpai, Wclouds, WEIWEIT, weiwo999, wenmy, Whenever interest, WX123456, xiaoHHH,

xiaoyuPPP, Xiefang625, xinxiangshicheng6698, yangkaijie, yehaoJJstore, yeminqing, yiwu city haozhuo crafts limited company, yiwuyinhaidianzishangwuyouxiangongsi, Zhou Du Stores, ZIWEIXING angel Agel Ecommerce Ltd and ZSDDP (“Defaulting Defendants”).

The Motion for Default Judgment is based upon the Affidavit of Brienne Scully in support of Plaintiff’s Motion for Default Judgment, the Certificate of Service of the Summons and Complaint, the Certificate of the Clerk of the Court stating that no answer has been filed in this action by Defaulting Defendants and upon all prior pleadings and proceedings herein.

Dated: May 1, 2019

Respectfully submitted,

EPSTEIN DRANGEL LLP

BY: /s/ Brienne Scully
Brienne Scully (BS 3711)
bscully@ipcounselors.com
60 East 42nd Street, Suite 2520
New York, NY 10165
Telephone: (212) 292-5390
Facsimile: (212) 292-5391
*Attorneys for Plaintiff
Mattel, Inc.*