

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MERCH TRAFFIC, LLC,

PLAINTIFF,

V.

THE PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED ON SCHEDULE A,

DEFENDANTS.

CASE No.: 24-cv-01269

JUDGE JOHN F. KNESS

MAGISTRATE JUDGE JEFFREY COLE

**MOTION FOR ENTRY OF DEFAULT AND DEFAULT JUDGMENT  
AGAINST THE DEFENDANTS IDENTIFIED ON SCHEDULE A**

Plaintiff, Merch Traffic, LLC, (“Merch Traffic” or “Plaintiff”) hereby moves this Honorable Court for entry of Default and Default Judgment against the Defendants identified on Amended Schedule A, attached hereto. Plaintiff files herewith a Memorandum of Law in support.

Dated: April 15, 2025

Respectfully submitted,

/s/ Gouthami V. Tufts

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**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on April 15, 2025, a true and correct copy of the above and foregoing document was: electronically filed, with the Clerk of the Court using the CM/ECF system; electronically published on a website to which the Defendants have been directed pursuant to the Service of Process; and emailed to all email addresses identified or provided for Defendants by the Defendants or third-parties, which includes a link to said website.

/s/ Gouthami V. Tufts  
Gouthami V. Tufts