

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

XiaoQian Zhao,

Plaintiff,

v.

THE PARTNERSHIPS, AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE "A",

Defendants.

Case No.: 1:23-cv-04507

Hon. Judge Matthew F. Kennelly

**ANSWER**

Defendants, BABIQIU, CCElegant, EasyFunny, Shanglan, NewO2, and SW-WORLDER (hereinafter, collectively as "Defendants" and separately as "Defendant"), by and through their attorneys, J. Zhang and Associates, P.C., as and for its Answer to the Complaint filed in the above-captioned action, state as follows:

**Introduction**

1. Neither admit or deny the allegations set forth in Paragraph 1 of the Complaint and leave Plaintiff to prove.
2. Denies each and every allegation in paragraph 2 of the Complaint.
3. Denies each and every allegation in paragraph 3 of the Complaint.
4. Denies each and every allegation in paragraph 4 of the Complaint.
5. Denies each and every allegation in paragraph 5 of the Complaint.
6. Neither admit or deny the allegations set forth in Paragraph 6 of the Complaint and leave Plaintiff to prove.

**Jurisdiction and Venue**

7. Lack sufficient knowledge and information to admit or deny the allegations set forth in paragraph 7 of the Complaint and thereby deny the same.
8. Lack sufficient knowledge and information to admit or deny the allegations set forth in paragraph 8 of the Complaint and thereby deny the same.

**Parties**

9. Neither admit or deny the allegations set forth in Paragraph 9 of the Complaint and leave Plaintiff to prove.
10. Neither admit or deny the allegations set forth in Paragraph 10 of the Complaint and leave Plaintiff to prove.
11. Neither admit or deny the allegations set forth in Paragraph 11 of the Complaint and leave Plaintiff to prove.
12. Neither admit or deny the allegations set forth in Paragraph 12 of the Complaint and leave Plaintiff to prove.
13. Neither admit or deny the allegations set forth in Paragraph 13 of the Complaint and leave Plaintiff to prove.
14. Neither admit or deny the allegations set forth in Paragraph 14 of the Complaint and leave Plaintiff to prove.
15. Neither admit or deny the allegations set forth in Paragraph 15 of the Complaint and leave Plaintiff to prove.
16. Neither admit or deny the allegations set forth in Paragraph 16 of the Complaint and leave Plaintiff to prove.
17. Neither admit or deny the allegations set forth in Paragraph 17 of the Complaint and leave Plaintiff to prove.

18. Neither admit or deny the allegations set forth in Paragraph 18 of the Complaint and leave Plaintiff to prove.
19. Neither admit or deny the allegations set forth in Paragraph 19 of the Complaint and leave Plaintiff to prove.
20. Neither admit or deny the allegations set forth in Paragraph 20 of the Complaint and leave Plaintiff to prove.
21. Admit that Answering Defendants reside in the People's Republic of China that has sold goods, in ecommerce, into Illinois. Defendants deny any remaining allegations in Paragraph 21.
22. Denies each and every allegation in paragraph 22 of the Complaint.

**Defendant's Unlawful Conduct**

23. Neither admit or deny the allegations set forth in Paragraph 23 of the Complaint and leave Plaintiff to prove.
24. Neither admit or deny the allegations set forth in Paragraph 24 of the Complaint and leave Plaintiff to prove.
25. Neither admit or deny the allegations set forth in Paragraph 25 of the Complaint and leave Plaintiff to prove.
26. Neither admit or deny the allegations set forth in Paragraph 26 of the Complaint and leave Plaintiff to prove.
27. Neither admit or deny the allegations set forth in Paragraph 27 of the Complaint and leave Plaintiff to prove.
28. Neither admit or deny the allegations set forth in Paragraph 28 of the Complaint and leave Plaintiff to prove.

29. Neither admit or deny the allegations set forth in Paragraph 29 of the Complaint and leave Plaintiff to prove.

30. Neither admit or deny the allegations set forth in Paragraph 30 of the Complaint and leave Plaintiff to prove.

31. Neither admit or deny the allegations set forth in Paragraph 31 of the Complaint and leave Plaintiff to prove.

32. Neither admit or deny the allegations set forth in Paragraph 32 of the Complaint and leave Plaintiff to prove.

33. Denies each and every allegation in paragraph 33 of the Complaint.

34. Denies each and every allegation in paragraph 34 of the Complaint.

35. Denies each and every allegation in paragraph 35 of the Complaint.

36. Denies each and every allegation in paragraph 36 of the Complaint.

37. Denies each and every allegation in paragraph 37 of the Complaint.

38. Denies each and every allegation in paragraph 38 of the Complaint.

39. Denies each and every allegation in paragraph 39 of the Complaint.

40. Denies each and every allegation in paragraph 40 of the Complaint.

**As to Count I**  
**Copyright Infringement (17 U.S.C. § 501)**

41. The answering Defendants repeat and reallege each and every response set forth in paragraphs 1 through 40 herein-above in response to the allegations set forth in paragraph 41 of the Complaint.

42. Neither admit or deny the allegations set forth in Paragraph 42 of the Complaint and leave Plaintiff to prove.

43. Neither admit or deny the allegations set forth in Paragraph 43 of the Complaint and leave Plaintiff to prove.

44. Neither admit or deny the allegations set forth in Paragraph 44 of the Complaint and leave Plaintiff to prove.

45. Denies each and every allegation in paragraph 45 of the Complaint.

46. Denies each and every allegation in paragraph 46 of the Complaint.

47. Denies each and every allegation in paragraph 47 of the Complaint.

48. Denies each and every allegation in paragraph 48 of the Complaint.

49. Denies each and every allegation in paragraph 49 of the Complaint.

50. Neither admit or deny the allegations set forth in Paragraph 50 of the Complaint and leave Plaintiff to prove.

51. Neither admit or deny the allegations set forth in Paragraph 51 of the Complaint and leave Plaintiff to prove.

**FIRST AFFIRMATIVE DEFENSE**

52. Plaintiff fails to state a claim against Defendants on which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE**

53. One or more third parties are liable for the conduct alleged and will be required to answer and indemnify.

**THIRD AFFIRMATIVE DEFENSE**

54. Defendants have one or more license(s).

**FOURTH AFFIRMATIVE DEFENSE**

55. Plaintiff has granted authorization and consent to the usage of the copyright-in-suit.

**FIFTH AFFIRMATIVE DEFENSE**

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