

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 26-23683-CV-WILLIAMS

Putian Baiyite Trading Co., Ltd.

Plaintiff

vs.

The Partnerships and Unincorporated
Associations Identified on Schedule “A”,

Defendant.

**PLAINTIFF’S VERIFIED RESPONSE TO THE COURT’S OMNIBUS ORDER
REGARDING SCHEDULE “A” CAUSES OF ACTION**

Plaintiff, Putian Baiyite Trading Co., Ltd. (“Plaintiff”), by and through the undersigned counsel, hereby submits this verified response to the Court’s Order Regarding Schedule “A” Causes of Action (“Order”), dated May 29, 2026. [Dkt 4].

1. On May 25, 2026, Plaintiff initiated this action against the Partnerships and Unincorporated Associations Identified on Schedule “A” (“Defendants”) for infringement of Plaintiff’s federally registered trademarks (the “Trademarks”). [Dkt 1].

2. Counsel for Plaintiff performed a search on the Public Access to Court Electronic Records (“PACER”) of case filings in relation to Trademarks through the case index search, in compliance with the Order. In addition to this case, no cases were found. A true and correct copy of the search result is attached hereto as **Exhibit A**.

3. There are no Defendants as to infringement of Trademarks in the instant case that have been sued by Plaintiff before. *See* Zhilian Chen’s Declaration at ¶ 5.

4. No other cases were filed on behalf of Plaintiff against the Defendants concerning

the Trademarks. *See* Zhilian Chen's Declaration at ¶ 6.

5. Accordingly, Plaintiff respectfully submits this Verified Response in compliance with the Court's Order.

Dated: June 9, 2026

Respectfully submitted,

/s/Ni Xue

Ni Xue, Esq.

Florida Bar Number: 1026130

Email: ni@kemetlawgroup.com

Kemet Law Group, LLC

1825 NW Corporate Blvd., Ste 110

Boca Raton, FL 33431

Telephone: (561) 870-0605

Facsimile: (561) 870-0606

*Attorney for Plaintiff Putian Baiyite Trading
Co., Ltd.*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Verified Response was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on June 9, 2026.

/s/ Ni Xue
Ni Xue, Esq.