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**UNITED STATES DISTRICT COURT**  
**CENTRAL DISTRICT OF CALIFORNIA**

AKRURA PTE. LTD, a Singapore  
company,

Case No.: 2:23-cv-000102

Plaintiff,

vs.

APERO TECHNOLOGIES GROUP, a  
Vietnam company, BEGAMOB  
GLOBAL, and TRUSTED TOOLS &  
UTILITIES APPS,

**PLAINTIFF'S NOTICE OF RULE  
55(b) MOTION FOR DEFAULT  
JUDGMENT**

Judge: Hon. Josephine L. Staton

Magistrate Judge: Hon Karen L.  
Stevenson

Defendants.

1                   **TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF**  
2                   **RECORD:**

3                   NOTICE IS HEREBY GIVEN that on September 29, 2023, at 10:30 a.m.,  
4 before the Honorable Josephine L. Staton, in Courtroom 8A of the United States  
5 Courthouse for the Central District of California, 350 West 1st St., Los Angeles,  
6 CA 90012, Plaintiff Akrura PTE LTD (“Plaintiff”), by and through its attorneys of  
7 record, will and hereby does move the Court to enter an order of default judgment  
8 against Defendants Apero Technologies Group, Begamob Global, and Trusted  
9 Tools & Utilities Apps (collectively, “Defendants”).

10                  As set forth in the accompanying Motion and Memorandum of Points and  
11 Authorities, there is good cause for the relief requested.

12                  Plaintiff’s Motion is based on this Notice of Motion, the accompanying  
13 Memorandum of Points and Authorities, the Declaration of Shelley Ivan and  
14 supporting exhibits, and such further arguments and matters as may be offered at  
15 the time of hearing of this Motion.

16                  Dated: September 1, 2023

**RIMON, P.C.**

17                  By: /s/ Mark Lee  
18                          Mark S. Lee (SBN: 94103)  
19                          Zheng Liu (SBN: 229311)  
20                          Shelley Ivan (*pro hac vice*)

21                          *Attorneys for Plaintiff*  
22                          AKRURA PTE. LTD.

**CERTIFICATE OF SERVICE**

I, Shelley Ivan, hereby certify that on September 1, 2023, a true correct copy of the foregoing **PLAINTIFF'S NOTICE OF RULE 55(b) MOTION FOR DEFAULT JUDGMENT** was served upon Defendants, pursuant to the Court's April 7, 2023 Order Granting Plaintiff's Ex Parte Motion for Alternative (Dkt. No. 24) as follows:

(1) Defendant Apero Technologies Group – by emailing the Service Papers to [trustedapp.help@gmail.com](mailto:trustedapp.help@gmail.com), [haudt@apero.vn](mailto:haudt@apero.vn) and [admin@apero.vn](mailto:admin@apero.vn), and mailing the Service Papers via FedEx to 2 Le Van Thiem, Thanh Xuan, Hanoi, Vietnam;

(2) Defendant Begamob Global – by emailing the Service Papers to info@begamob.com and mailing the Service Papers to (i) 11 Beach Rd., #03-01, Crasco Building, Singapore, and (ii) 34 Hoang Cau, Dong Da, Hanoi, Vietnam, via FedEx; and

(3) Defendant Trusted Tools & Utilities Apps – by emailing the Service Papers to liveroyalstudio.inc@gmail.com and electronically publishing a link to the Service Papers.

By: /s/ Shelley Ivan  
Shelley Ivan