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12 Email: zheng.liu@rimonlaw.com

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18 Email: shelly.ivan@rimonlaw.com
19 *Attorneys for Plaintiff* AKRURA PTE. LTD

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

22 AKRURA PTE. LTD, a Singapore
23 company,

24 Plaintiff,

25 vs.

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

Defendants.

Case No.: 2:23-cv-000102

**DECLARATION OF SHELLEY
IVAN IN SUPPORT OF
PLAINTIFF'S RULE 55(b)
MOTION FOR DEFAULT
JUDGMENT**

Judge: Hon. Josephine L. Staton

Magistrate Judge: Hon Karen L.
Stevenson

I

1 1. I am an attorney licensed to practice law in the state of New York. I
2 am also admitted to practice *pro hac vice* before this Court. Dkt. 18.

3 2. I am a partner at the law firm of Rimón, P.C., where I practice
4 primarily intellectual property law and commercial litigation.

5 3. I represent Plaintiff Akrura PTE. LTD (“Plaintiff”) against
6 Defendants Apero Technologies Group (“Apero”), Begamob Global (“Begamob”)
7 and Trusted Tools & Utilities Apps (“Tools”) in the above-captioned case for
8 copyright infringement, whereby Defendants improperly copied Plaintiff’s blood
9 pressure mobile application and offered infringing versions on Google Play.
10 Compl., Dkt. 1.

11 4. I submit this Declaration in support of Plaintiff’s Rule 55(b)
12 Motion for Default Judgment.

13 5. Attached hereto as Exhibit A is a true and correct copy of Plaintiff’s
14 DMCA Takedown Request to Google, dated August 17, 2022.

15 6. Attached hereto as Exhibit B is a true and correct copy of Plaintiff’s
16 email to Defendant Apero, dated August 30, 2022.

17 7. Attached hereto as Exhibit C is a true and correct copy of Plaintiff’s
18 Takedown request to Google, dated October 18, 2022.

19 8. Attached hereto as Exhibit D is a true and correct copy of Google’s
20 email to Plaintiff, dated December 23, 2022.

21 9. Attached hereto as Exhibit E is a true and correct copy of Plaintiff’s
22 Takedown Request to Google, dated October 25, 2022.

23 10. Attached hereto as Exhibit F is a true and correct copy of Plaintiff’s
24 Takedown Request to Google, dated December 13, 2022.

25 11. Attached hereto as Exhibit G is a true and correct copy of an email
26 from Defendant Begamob to Plaintiff, dated March 22, 2023.

27 12. Attached hereto as Exhibit H is a true and correct copy of a set of
28 service emails to Defendants, dated August 14, 2023.

13. Attached hereto as Exhibit I is a true and correct copy of an email from Google to Plaintiff, dated August 22, 2023.

Executed this 1st day of September, 2023, at Santa Barbara, California.

/s/ Shelley Ivan
Shelley Ivan

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(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.

3

**DECLARATION OF SHELLEY IVAN IN SUPPORT OF PLAINTIFF’S RULE 55(b)
MOTION FOR DEFAULT JUDGMENT**

EXHIBIT A

From: removals@google.com <removals@google.com>
Sent: Wednesday, August 17, 2022 2:28 PM
To: David Silver <david@bayramoglu-legal.com>
Subject: Re: Your Request to Google [1-5031000033050]

Hello,

Thanks for reaching out to us.

Regarding the following URLs:

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker&gl=us>

We note that the developer in question has provided contact information in their application listing. Please confirm that you have first attempted to resolve this issue with the developer of the application in question by contacting them at Trustedapp.help@gmail.com.

Regards,

The Google Team

For more information about our content removal process access g.co/legal.

Report alleged copyright infringement

Country of residence
United States

Full legal name
David Silver

Company name
Bayramoglu Law Offices LLC

Full legal name of the copyright holder you represent

JIAO MINGYANG

Contact email address

david@bayramoglu-legal.com

Identify and describe the copyrighted work

The text within our client's blood pressure mobile application has been copied word for word, as can be seen in the highlighted portion of the attachment being filed herewith.

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker&hl=en&gl=us>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker&gl=us>

Attach a screenshot of the allegedly infringing material

Comparison Material 0812.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

Please check to confirm

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Please check to confirm

I understand that a copy of the notice may be sent to the developer of the affected content.

Please check to confirm

Signature

David Silver

Supplementary Materials of Complaint

Our Original App: <https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker>

Blood Pressure App

QR Code Scanner.

Contains ads

4.6★

151K reviews

10M+

Downloads

E

Everyone



Infringing App: <https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker>

Blood Pressure Tracker

Apero Technologies Group - TrustedApp

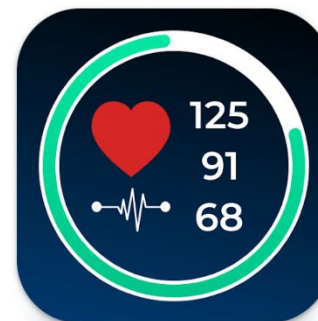
Contains ads

1K+

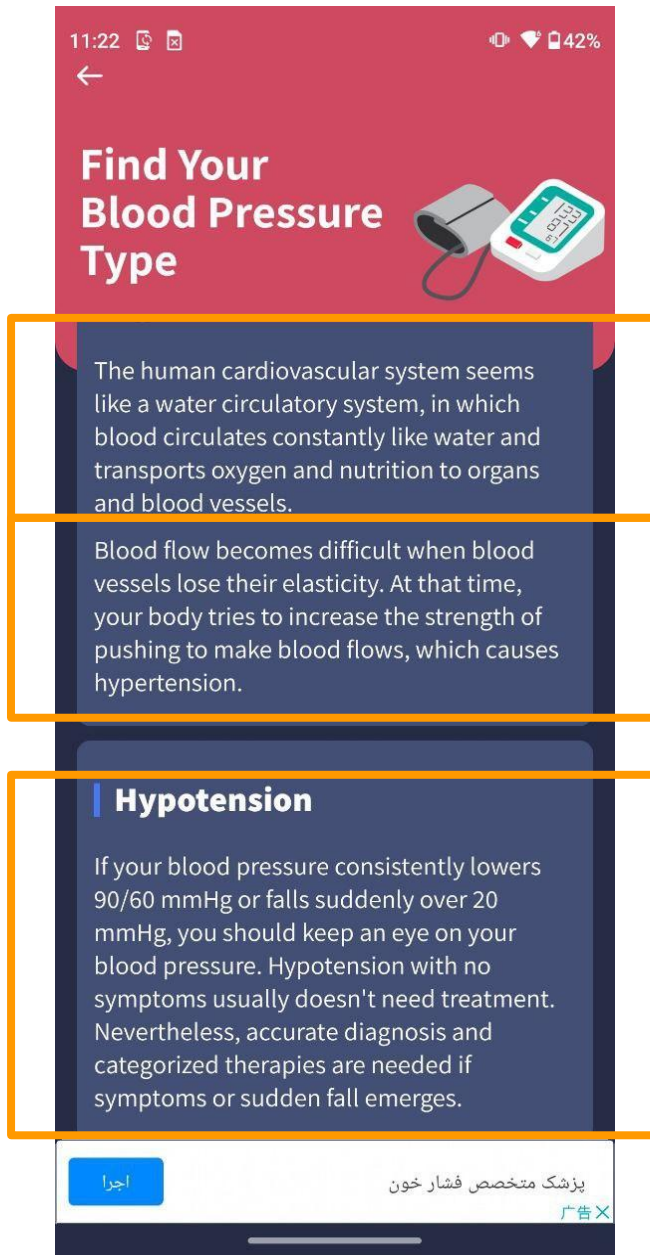
Downloads

E

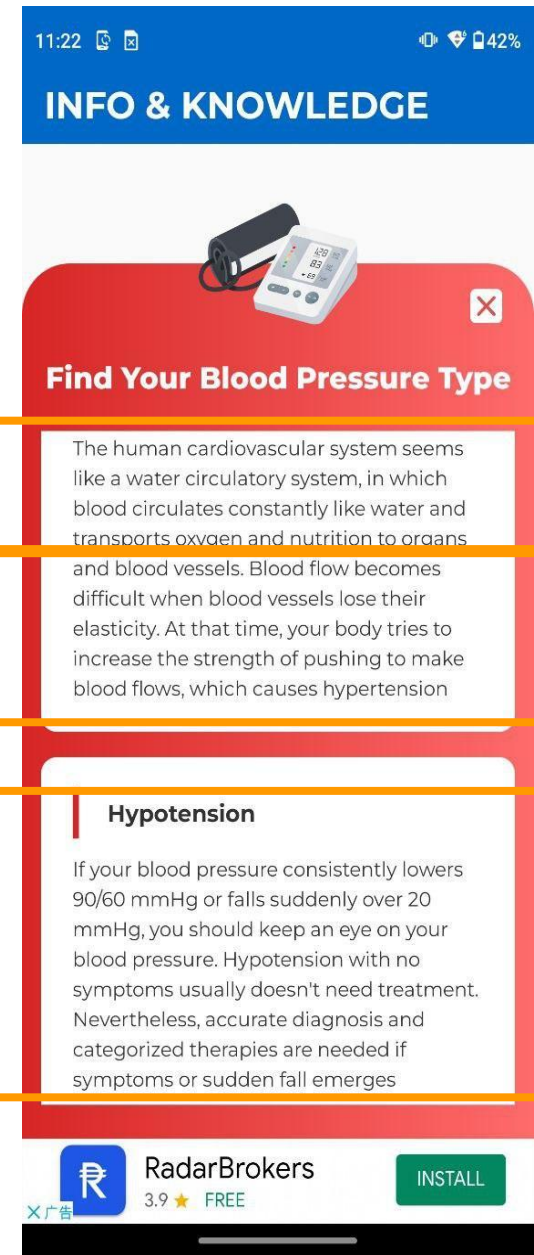
Everyone



100% Copied our Inapp Text

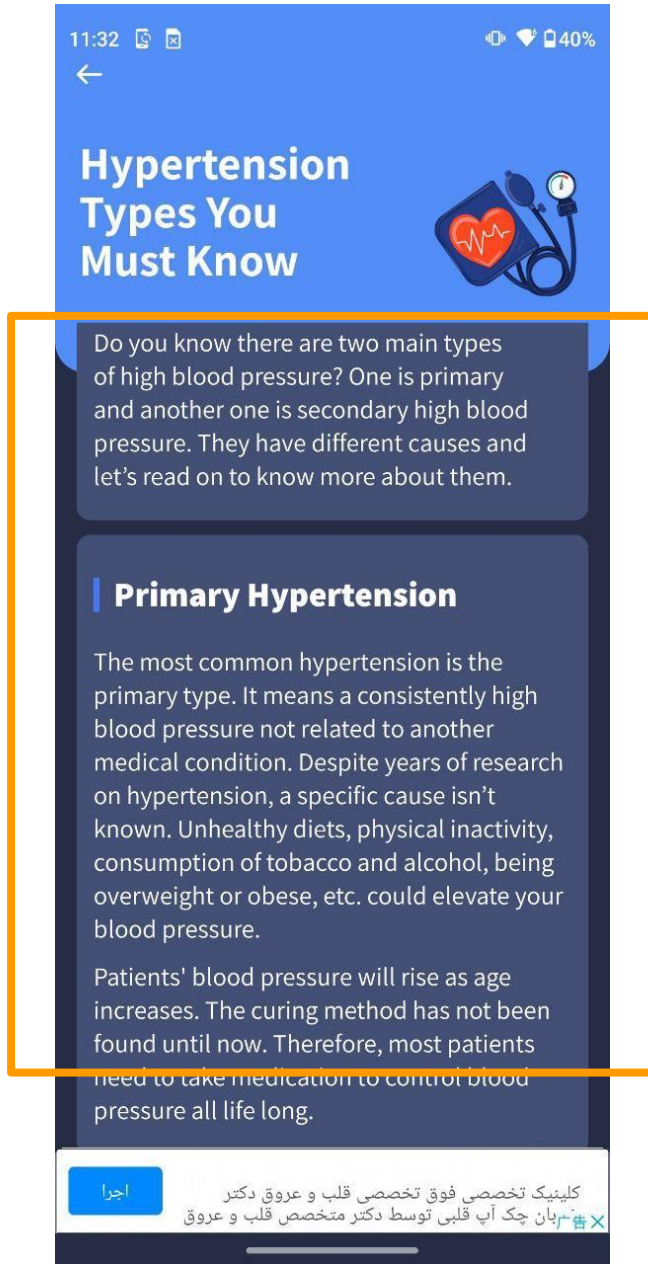


Our Copyrighted App



Allegedly Infringing App

100% Copied our Inapp Text

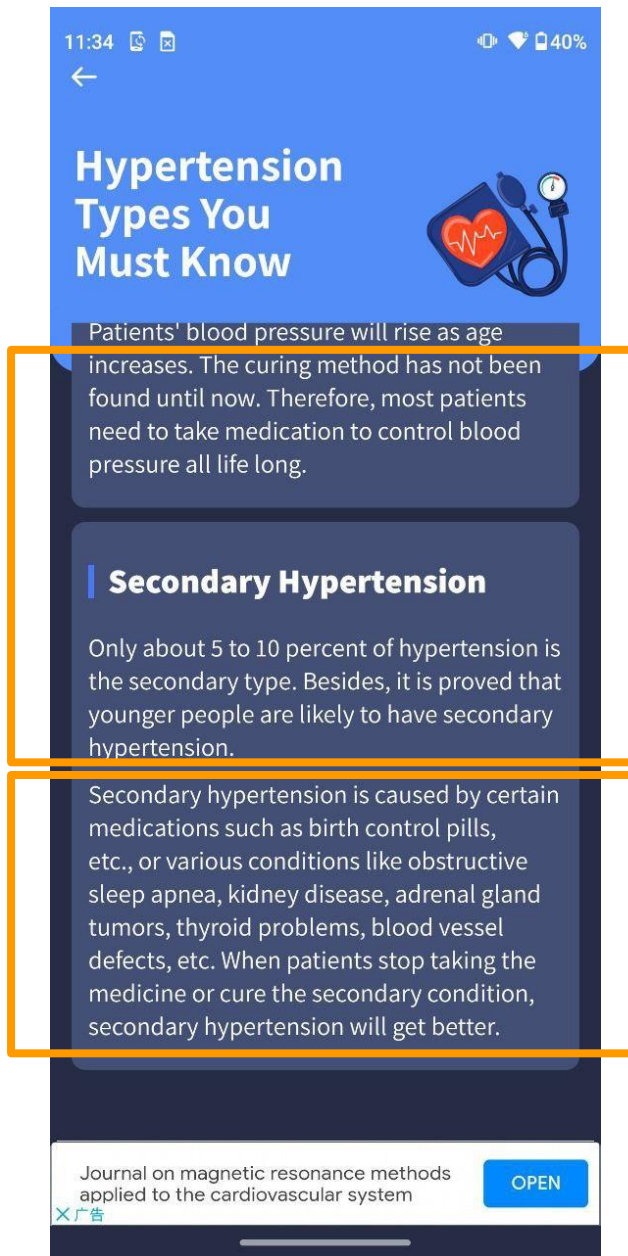


Our Copyrighted App

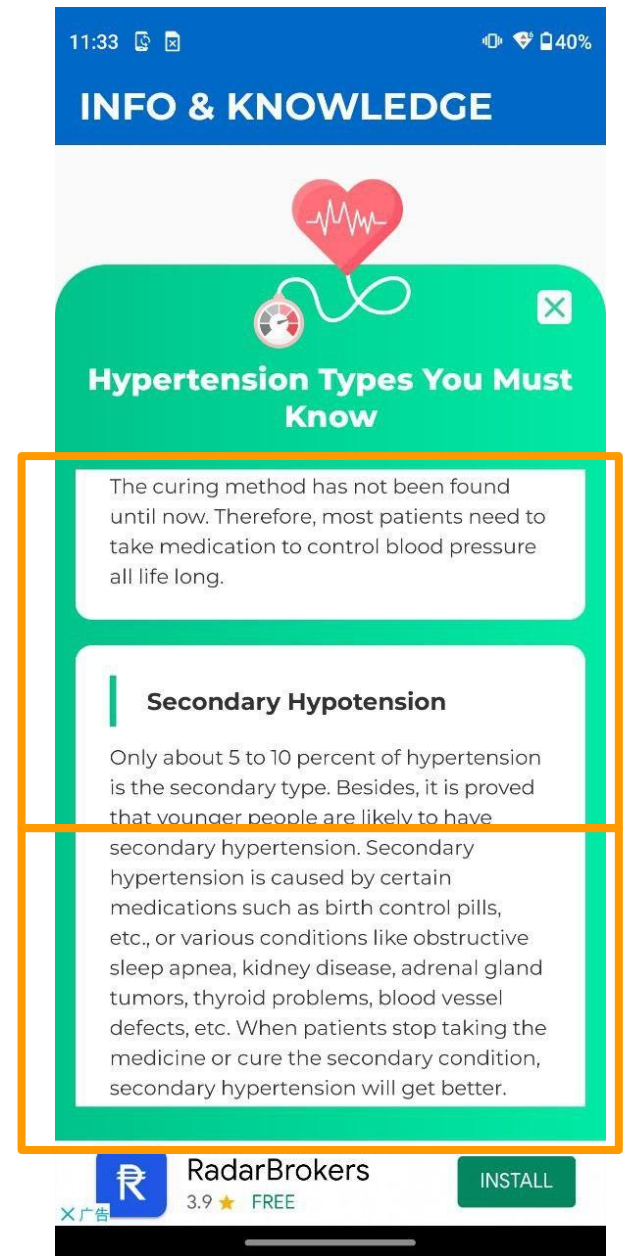


Allegedly Infringing App

100% Copied our Inapp Text

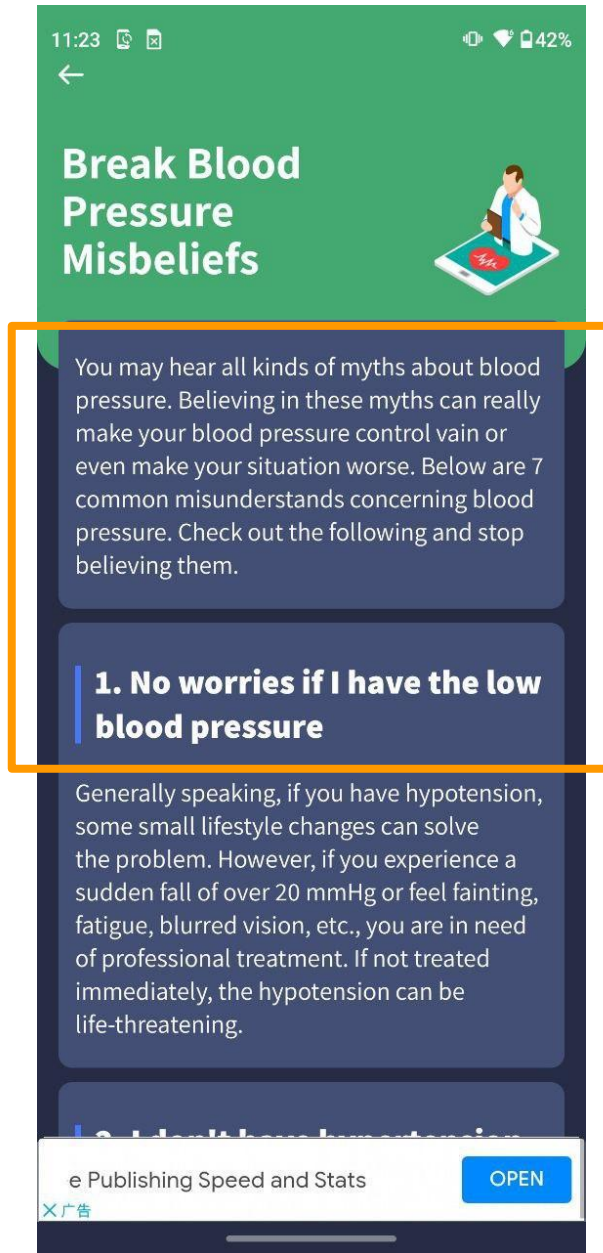


Our Copyrighted App



Allegedly Infringing App

100% Copied our Inapp Text

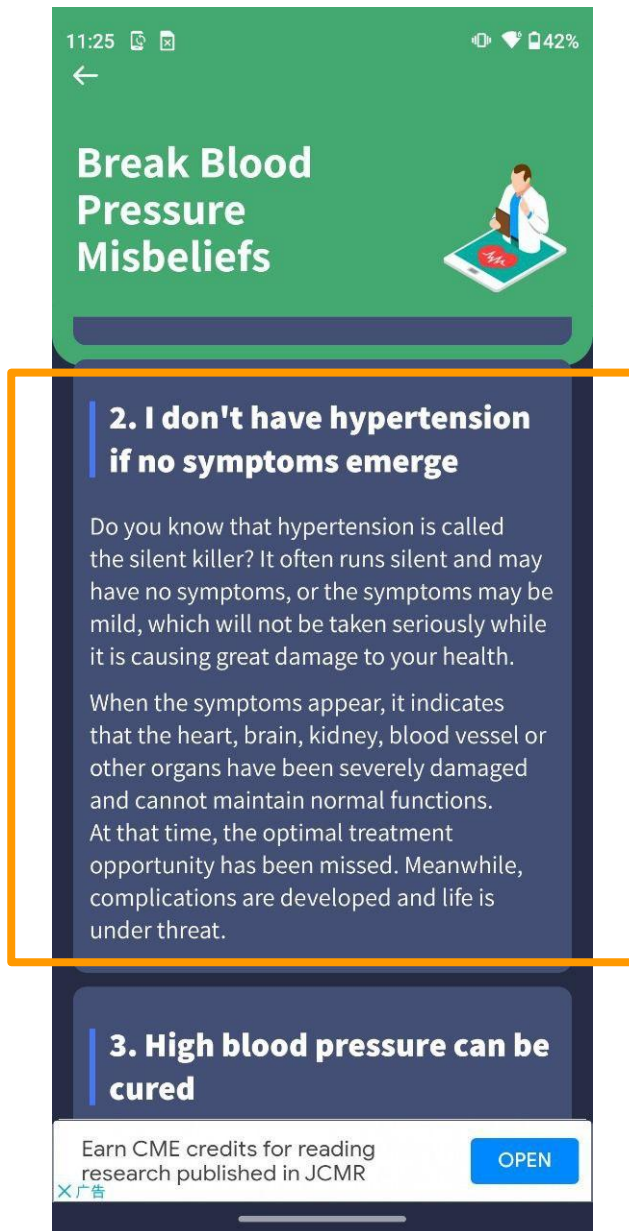


Our Copyrighted App

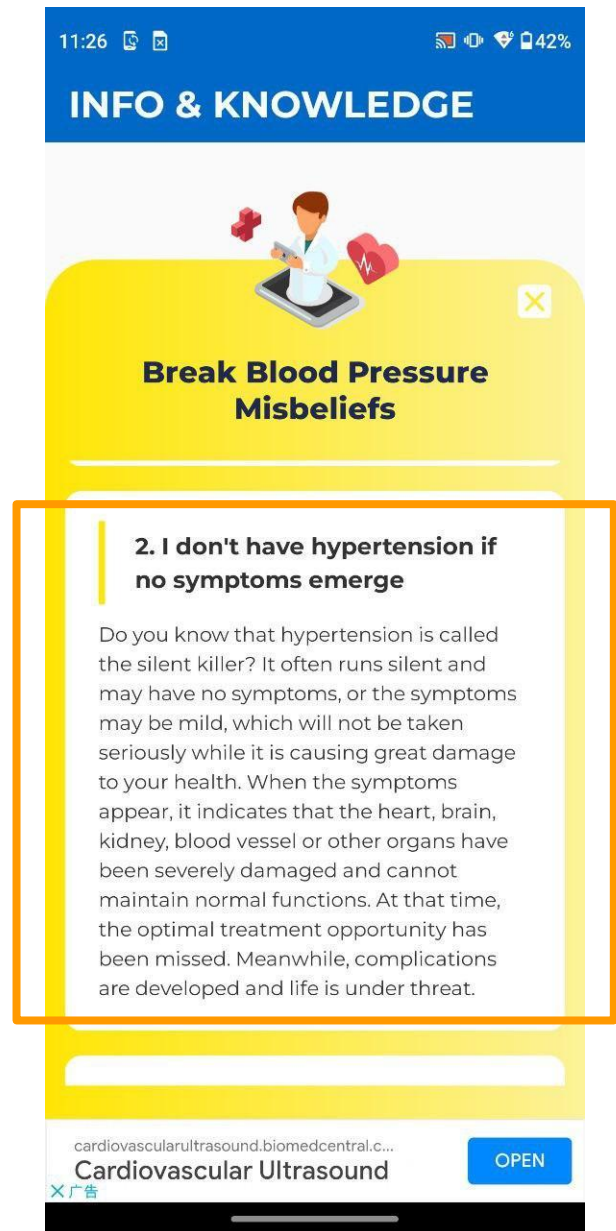


Allegedly Infringing App

100% Copied our Inapp Text

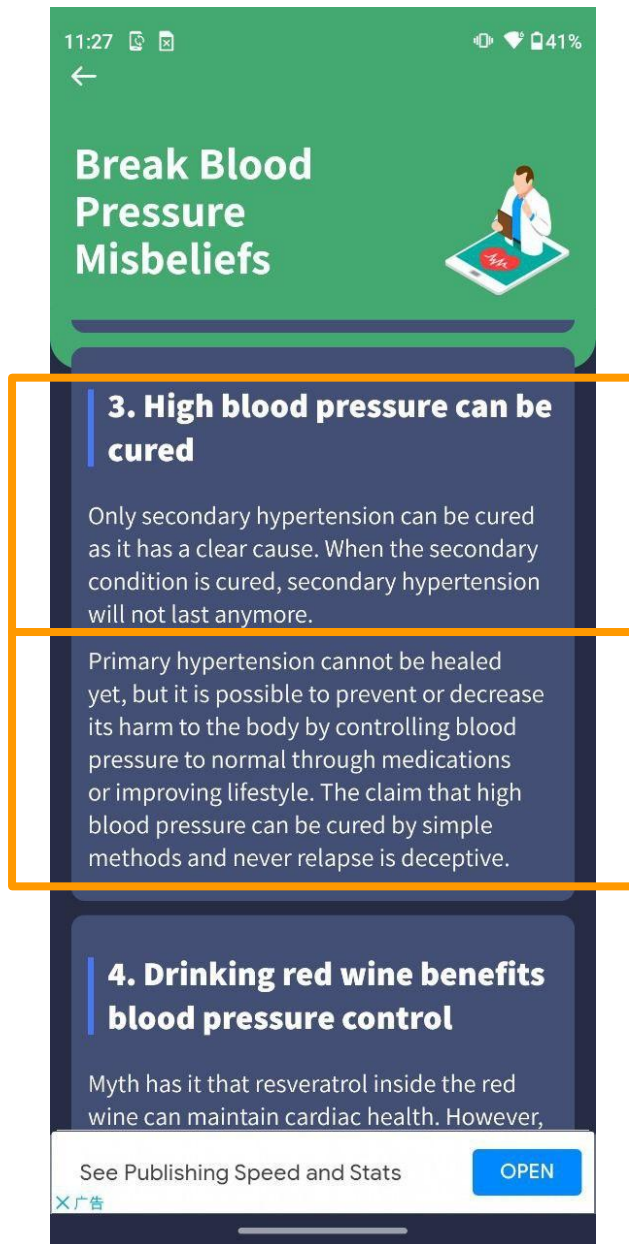


Our Copyrighted App

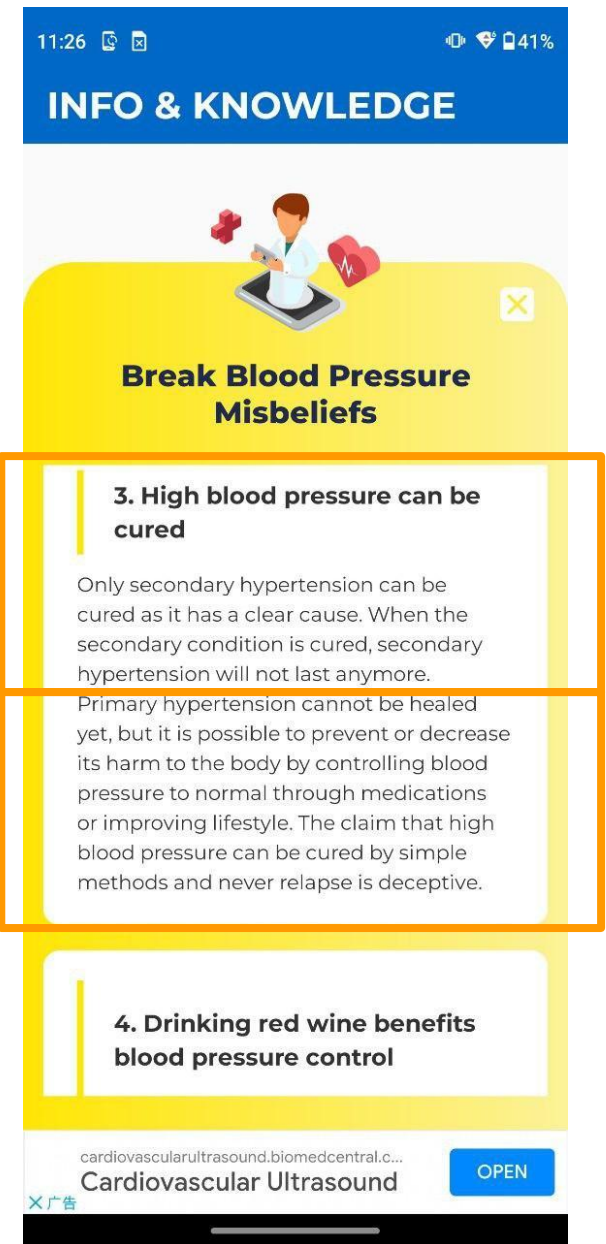


Allegedly Infringing App

100% Copied our Inapp Text

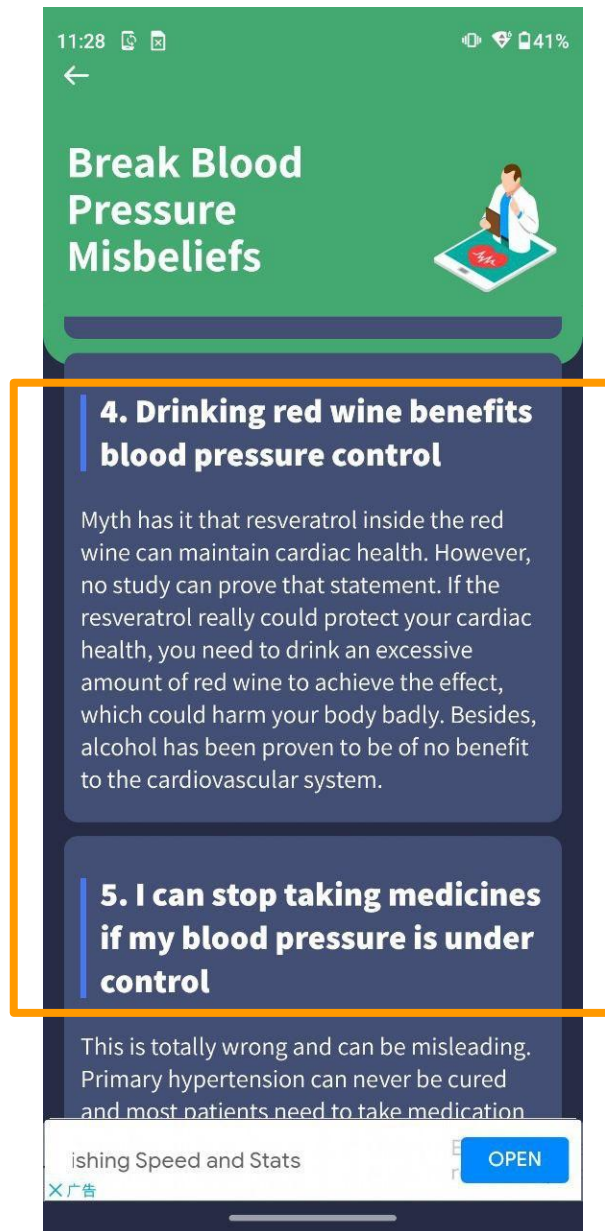


Our Copyrighted App

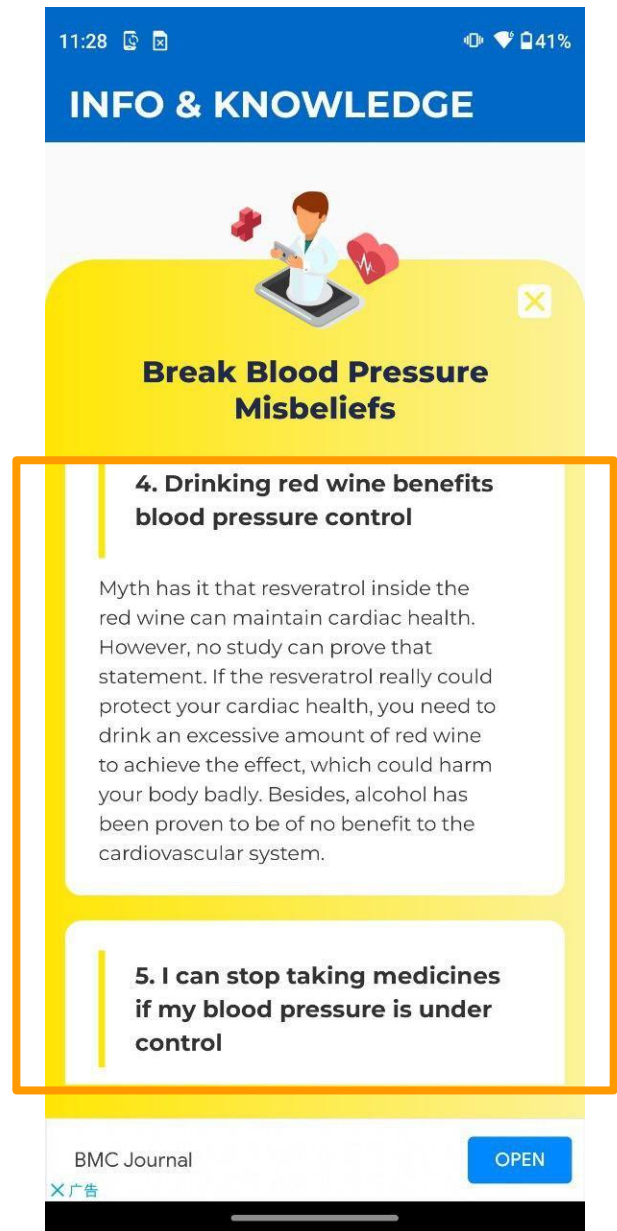


Allegedly Infringing App

100% Copied our Inapp Text



Our Copyrighted App

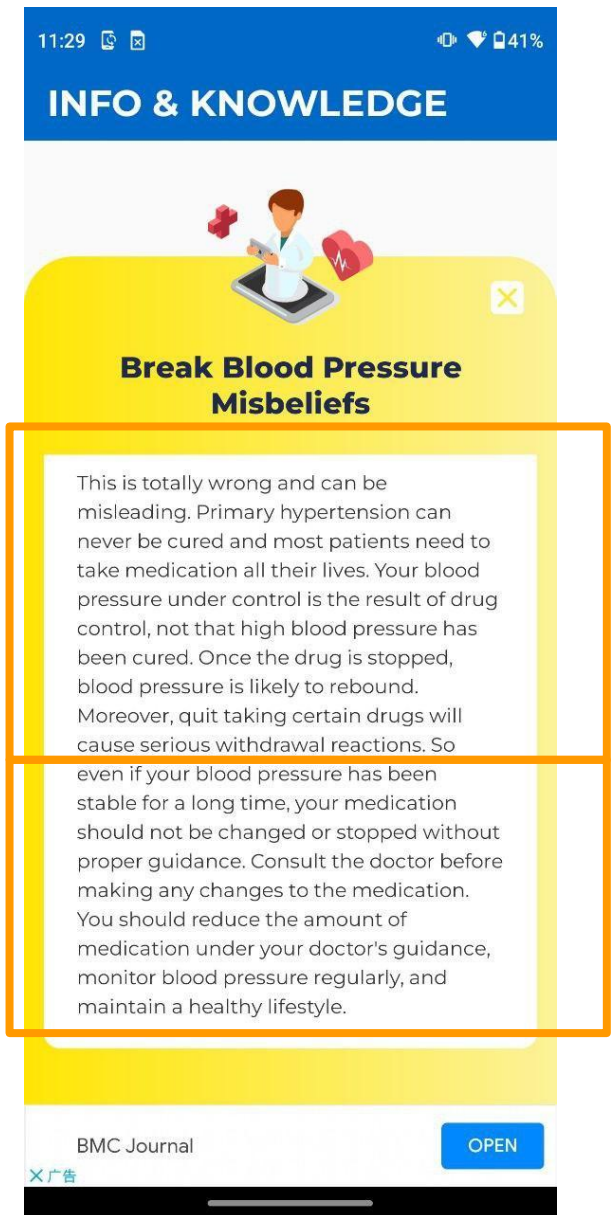


Allegedly Infringing App

100% Copied our Inapp Text

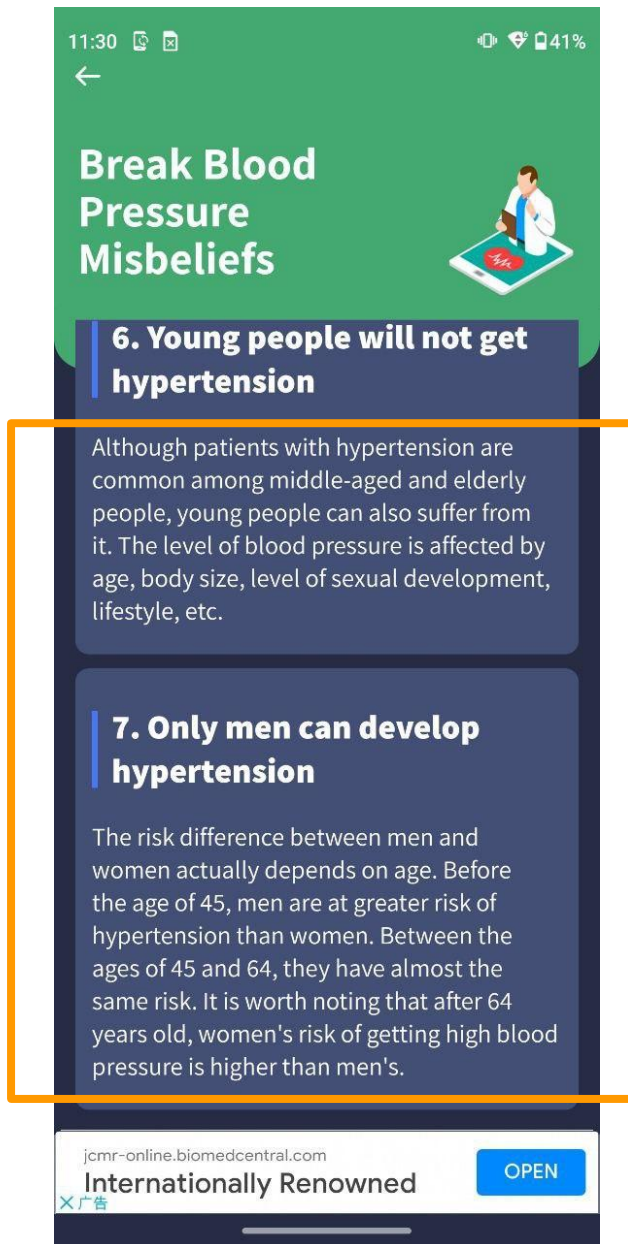


Our Copyrighted App

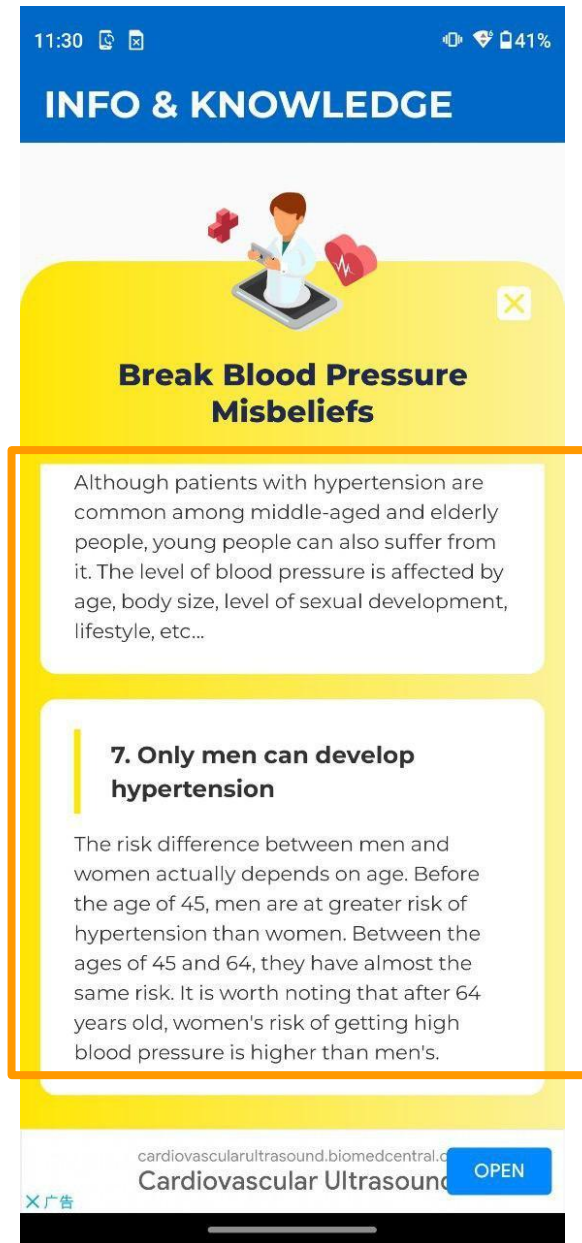


Allegedly Infringing App

100% Copied our Inapp Text

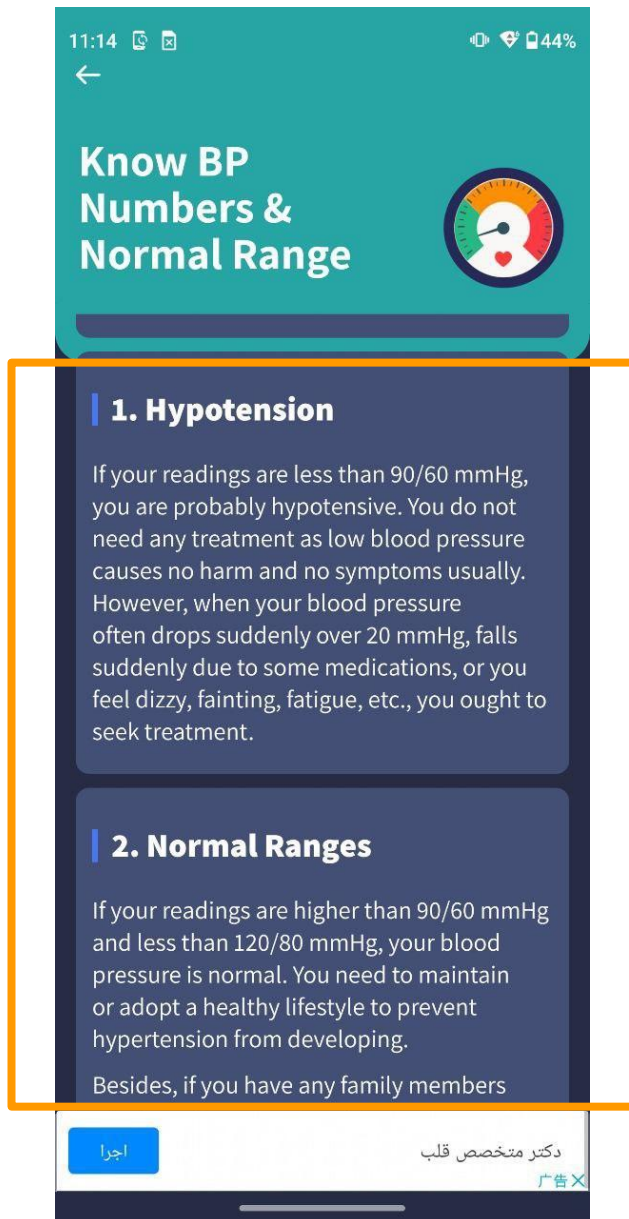


Our Copyrighted App

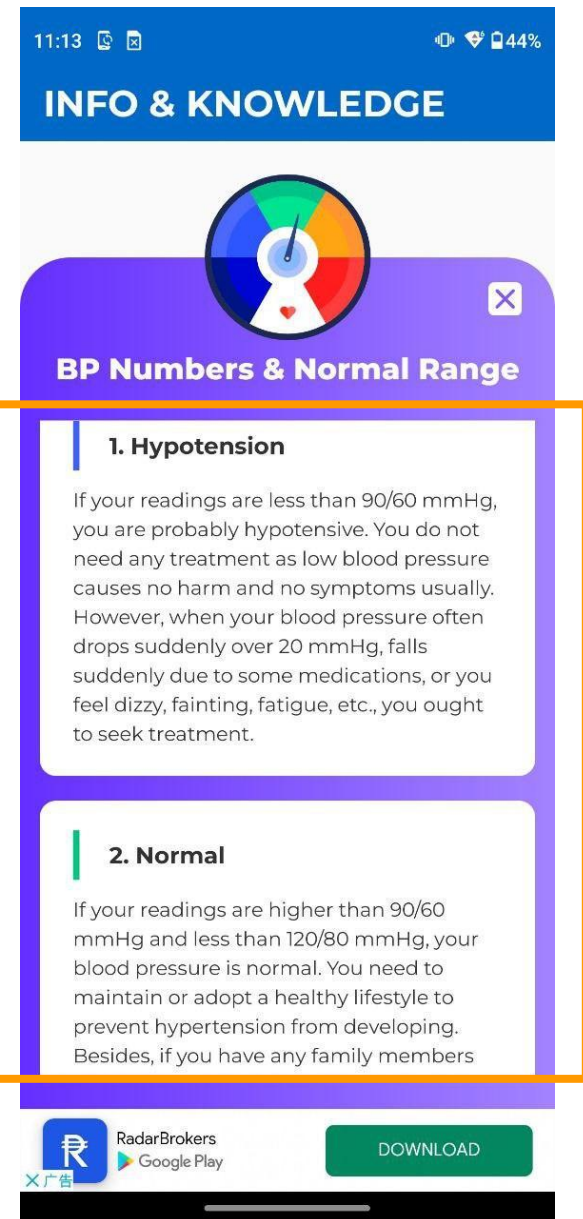


Allegedly Infringing App

100% Copied our Inapp Text

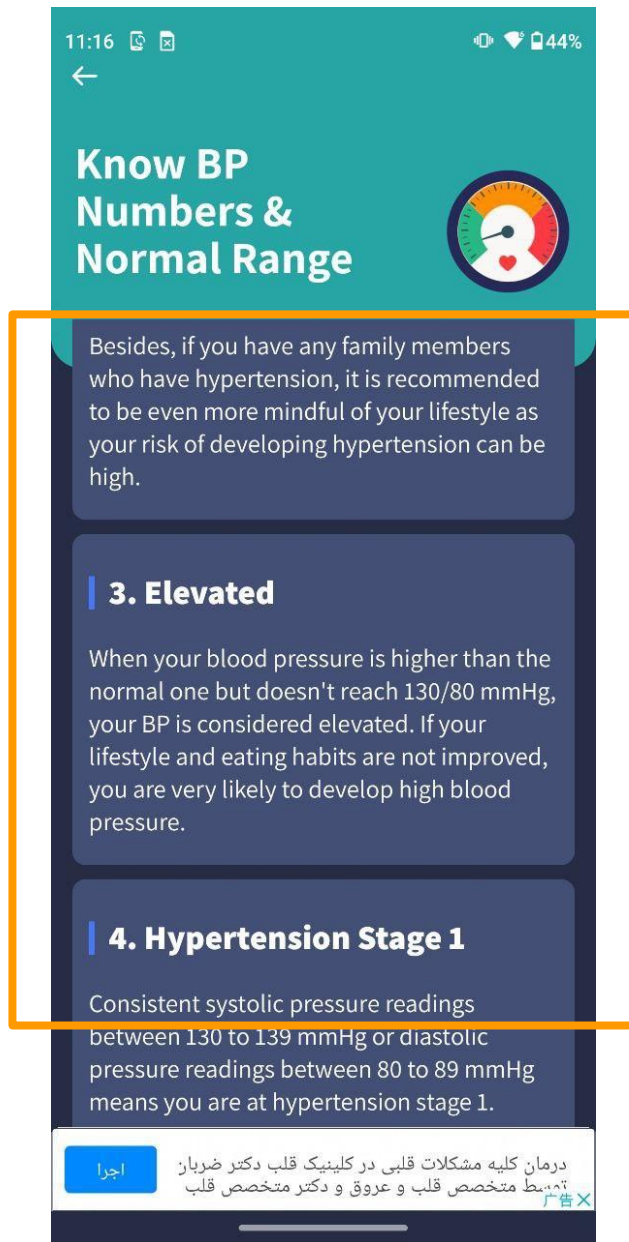


Our Copyrighted App

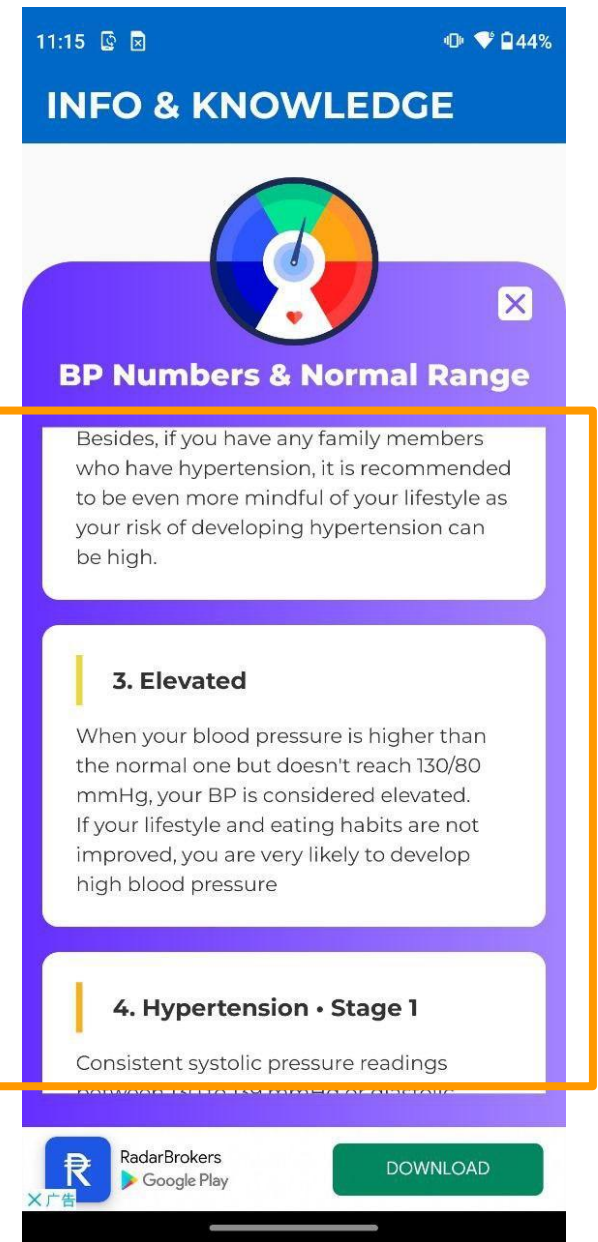


Allegedly Infringing App

100% Copied our Inapp Text

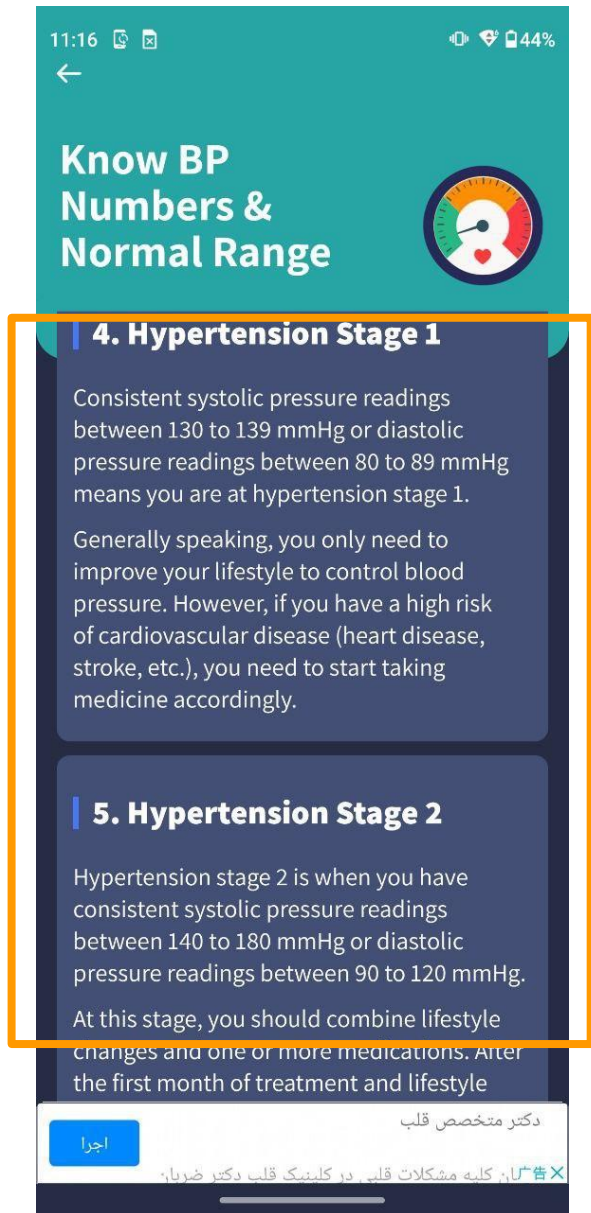


Our Copyrighted App

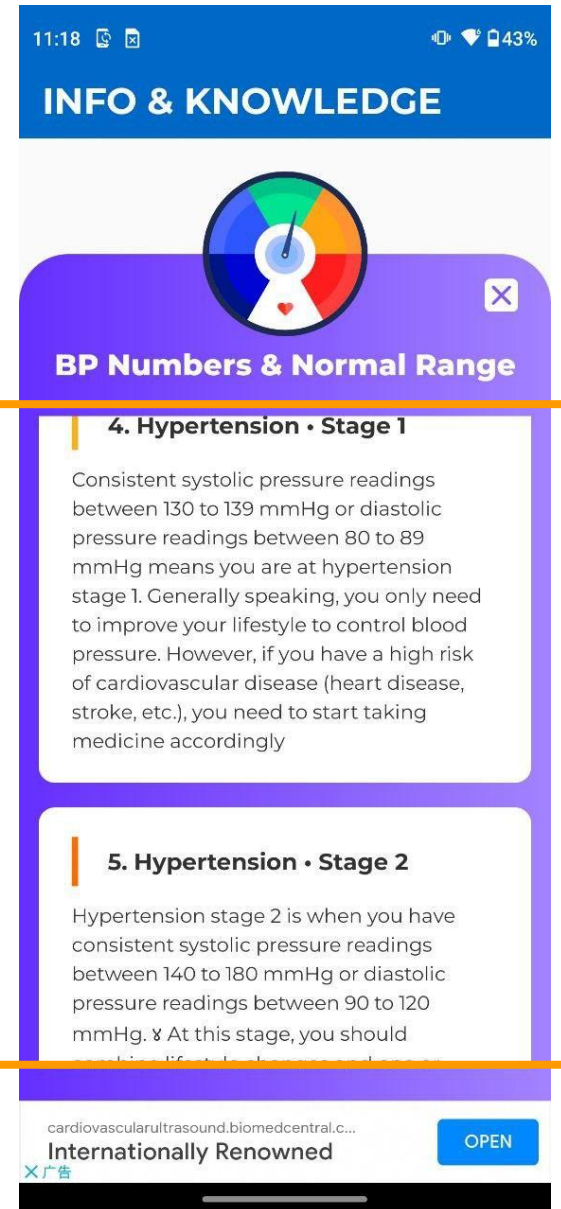


Allegedly Infringing App

100% Copied our Inapp Text

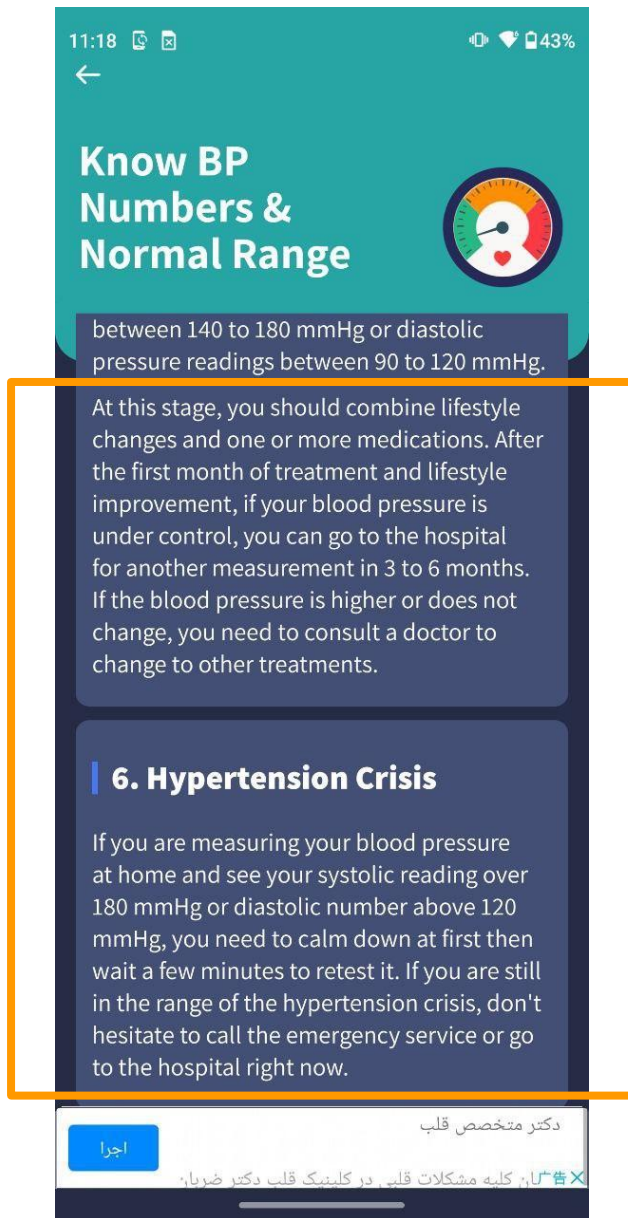


Our Copyrighted App

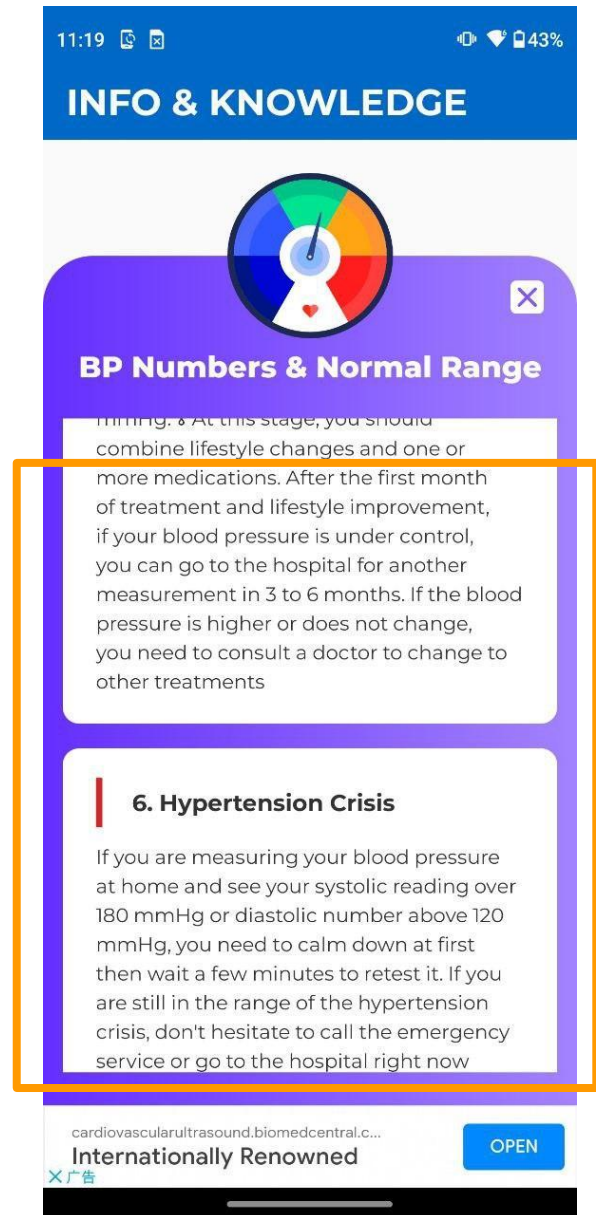


Allegedly Infringing App

100% Copied our Inapp Text

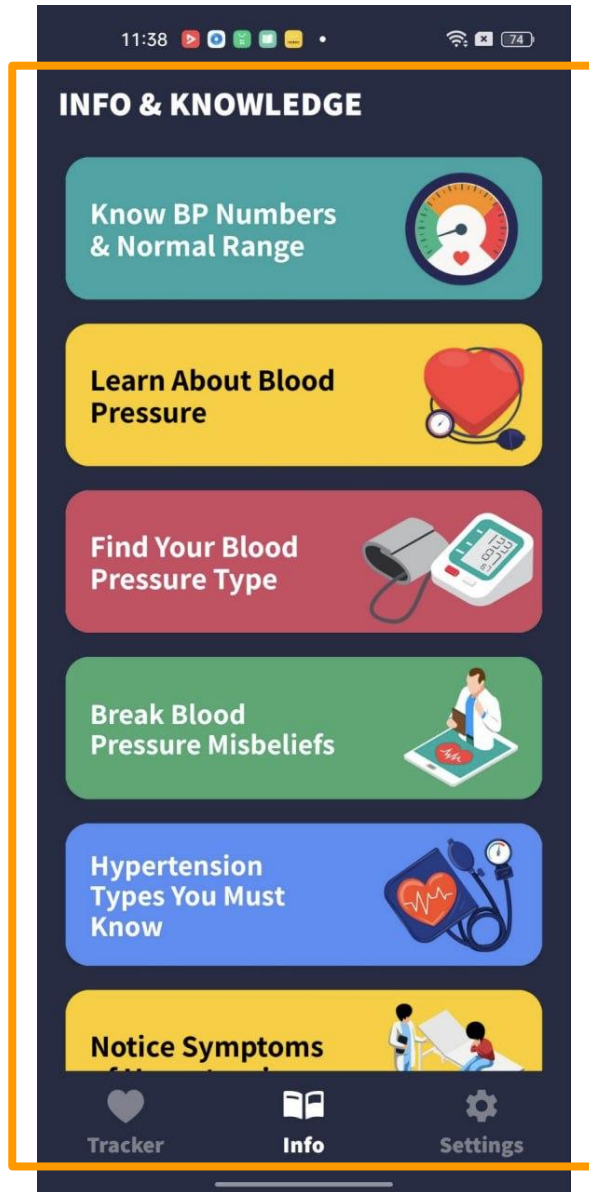


Our Copyrighted App

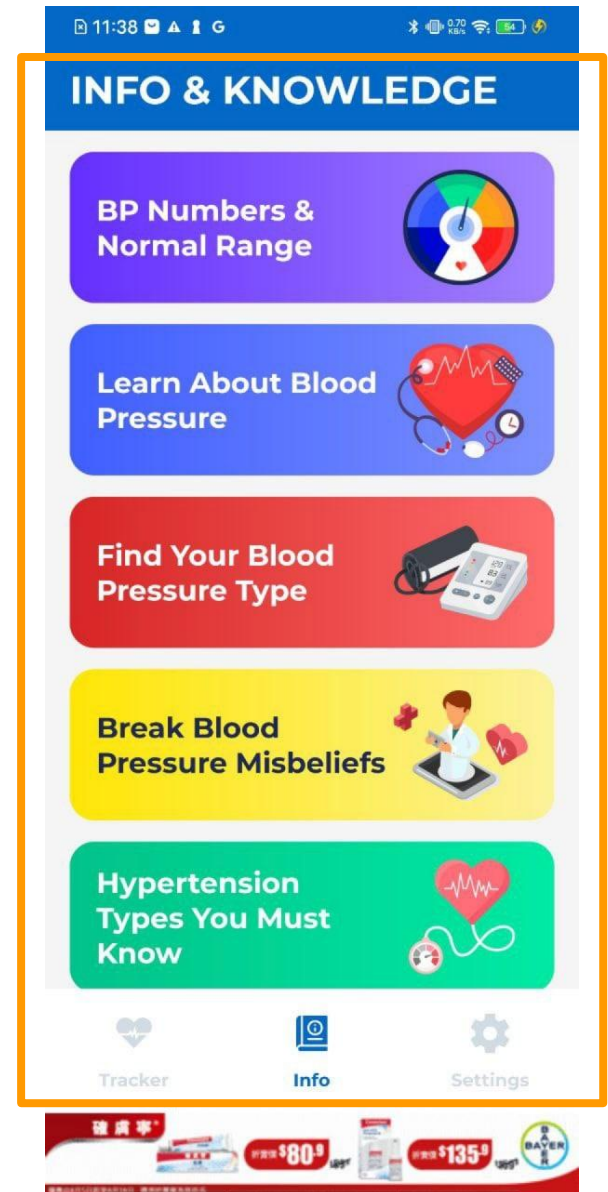


Allegedly Infringing App

Copied our Inapp Text & UI Design



Our Copyrighted App



Allegedly Infringing App

Our app was released **much earlier** than the infringing app



Blood Pressure App

About this app

We promise that you will find it fast and easy to pay close attention to your blood pressure and to detect small changes brought by your lifestyle improvements.

Using the Blood Pressure App, you can grasp your BP condition fully under different states (lying, sitting, before/after meal, etc.). There is no doubt that your health will be taken care of to yield twice the result with half the effort.

You can export your BP trends to maximize your medical appointment. Our app also introduces tips and methods for your health improvements in the long term.

What's more, when you wish to know more about blood pressure, feel free to contact us and we are here by your side and ready to help.

Version	Updated on
1.2.2	Jun 22, 2022
Requires Android	Downloads
5.0 and up	10,000,000+ downloads
Content rating	Permissions
Everyone Learn more	View details
Released on	Offered by
Nov 17, 2021	QR Code Scanner.



Blood Pressure Tracker

Health & Fitness (Applications) | [Open in Google Play](#)

conclusions about the user's blood pressure zone. The blood pressure journal in the diary is very flexible in terms of time, depending on the needs of the user.

MAIN FUNCTIONS OF BLOOD PRESSURE TRACKER APP

Record blood pressure status daily

- The application allows users to fill in blood pressure information according to 3 values: Systolic (systolic blood pressure readings), Diastolic (diastolic blood pressure readings) and Pulse (bp heart rate measurements) with just 1 touch. In a few seconds, the indicators will be automatically updated on the blood pressure app, after calculating and analyzing, the app will give the last result.

- After filling in, data for each day will be shown by a column with a color corresponding to the blood pressure zone it belongs to. You can completely edit or update the entered indicators in the blood pressure diary.

Determine blood pressure zones

The bp zone includes 6 zones, after collecting numbers from the blood pressure tracker you can know whether you have a normal blood pressure level or an unsafe level (high blood pressure/ low blood pressure).

Track BP, edit data in blood pressure journal

Screenshots



Versions

2022.07.24 Current release Jul 24,

[See M...](#)

About

Category: Health & Fitness

Initial Release Date: Jul 24, 2022

Last Updated Time: Aug 10, 2022

Version: 2022.07.24

Content Rating: Rated for 3+

[Data Resource URL](#)

Our Copyrighted App

Allegedly Infringing App

EXHIBIT B

发件人: David Silver <david@bayramoglu-legal.com>

发送时间: 2022 年 8 月 30 日 2:35

收件人: Trustedapp.help@gmail.com <Trustedapp.help@gmail.com>

抄送: TM@bayramoglu-legal.com <tm@bayramoglu-legal.com>; candy@bayramoglu-legal.com <candy@bayramoglu-legal.com>

主题: Re: Copyright Infringement by Apero Technologies Group - TrustedApp (Blood Pressure Tracker)

Dear Apero Technologies Group,

As I received a notification that your hr@apero.vn email obtained from your website is invalid, I am sending the email again solely to the email provided on your developer page. I have also edited the time to respond due to remedy a clerical error.

I am reaching out to you on behalf of our client, JIAO MINGYANG, who is the owner of a mobile application for tracking blood pressure. Your mobile application "Blood Pressure Tracker" explicitly and directly copies the exact text from our client's mobile application, clearly infringing on our client's copyright. Please see the attached examples of the directly copies text.

Our client's mobile application has priority as it was developed and released prior to your mobile application. You had full access to our client's mobile application and it is clear that you went through and copied the internal text for your own financial benefit.

Therefore, we must request that the text be changed so as to not infringe on our client's copyright. Please confirm that the changes will be made no later than **September 2, 2022**.

Please note that silence will be viewed as a refusal to cooperate and a willful infringement of our client's intellectual property rights.

Sincerely,
David Silver

From: David Silver

Sent: Monday, August 29, 2022 11:30 AM

To: Trustedapp.help@gmail.com <Trustedapp.help@gmail.com>; hr@apero.vn <hr@apero.vn>

Cc: TM@bayramoglu-legal.com <tm@bayramoglu-legal.com>; candy@bayramoglu-legal.com <candy@bayramoglu-legal.com>

Subject: Copyright Infringement by Apero Technologies Group - TrustedApp (Blood Pressure Tracker)

Dear Apero Technologies Group,

I am reaching out to you on behalf of our client, JIAO MINGYANG, who is the owner of a mobile application for tracking blood pressure. Your mobile application "Blood Pressure Tracker" explicitly and directly copies the exact text from our client's mobile application, clearly infringing on our client's copyright. Please see the attached examples of the directly copies text.

Our client's mobile application has priority as it was developed and released prior to your mobile application. You had full access to our client's mobile application and it is clear that you went through and copied the internal text for your own financial benefit.

Therefore, we must request that the text be changed so as to not infringe on our client's copyright. Please confirm that the changes will be made no later than **September 2, 2022**.

Please note that silence will be viewed as a refusal to cooperate and a willful infringement of our client's intellectual property rights.

Sincerely,
David Silver

EXHIBIT C

----- Forwarded message -----

From: removals@google.com <removals@google.com>

Sent: Tuesday, October 18, 2022 11:13 AM

To: David Silver <david@bayramoglu-legal.com>

Subject: Your Request to Google [9-1815000033310]

Hi,

Thanks for reaching out to us.

We have received your legal request. Please note that Google will only email you about this notice if we need additional clarification. If we process and remove all of the identified content from the URLs you provided and do not receive a counternotice, you will not receive any further e-mails about it from Google.

Regards,

The Google Team

Due to the impact of COVID-19, it may take us longer than usual respond to your request. Our apologies for the inconvenience.

Report alleged copyright infringement

Country of residence

United States

Full legal name

David Silver

Company name

Bayramoglu Law Offices LLC

Full legal name of the copyright holder you represent

JIAO MINGYANG

Contact email address

david@bayramoglu-legal.com

Identify and describe the copyrighted work

We had filed a previous DMCA Takedown Request for this application, and Google claimed it could not find the infringing material and requested additional evidence. When we provided the additional evidence, Google said it

would not consider additional evidence and required us to submit a new DMCA Takedown Request. Google then proceeded to ignore all of our later [correspondence](#). So here we are filing a second DMCA Takedown Request as there are still multiple text and user interface layout that infringes on our client's copyrights, which can be seen in the supplemental material attached. Please take the appropriate action in accordance with the DMCA.

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker>

Attach a screenshot of the allegedly infringing material

Supplementary Material.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

Please check to confirm

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Please check to confirm

I understand that a copy of the notice may be sent to the developer of the affected content.

Please check to confirm

Signature

David Silver

Supplementary Materials of Complaint

Our Product: <https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker&gl=us>

Blood Pressure App

QR Code Scanner.

Contains ads

4.6★
149K reviews

10M+
Downloads

E
Everyone ⓘ

Install

Add to wishlist



Infringing App: <https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker&gl=us>

Blood Pressure Tracker

Apero Technologies Group - TrustedApp

Contains ads

1K+
Downloads

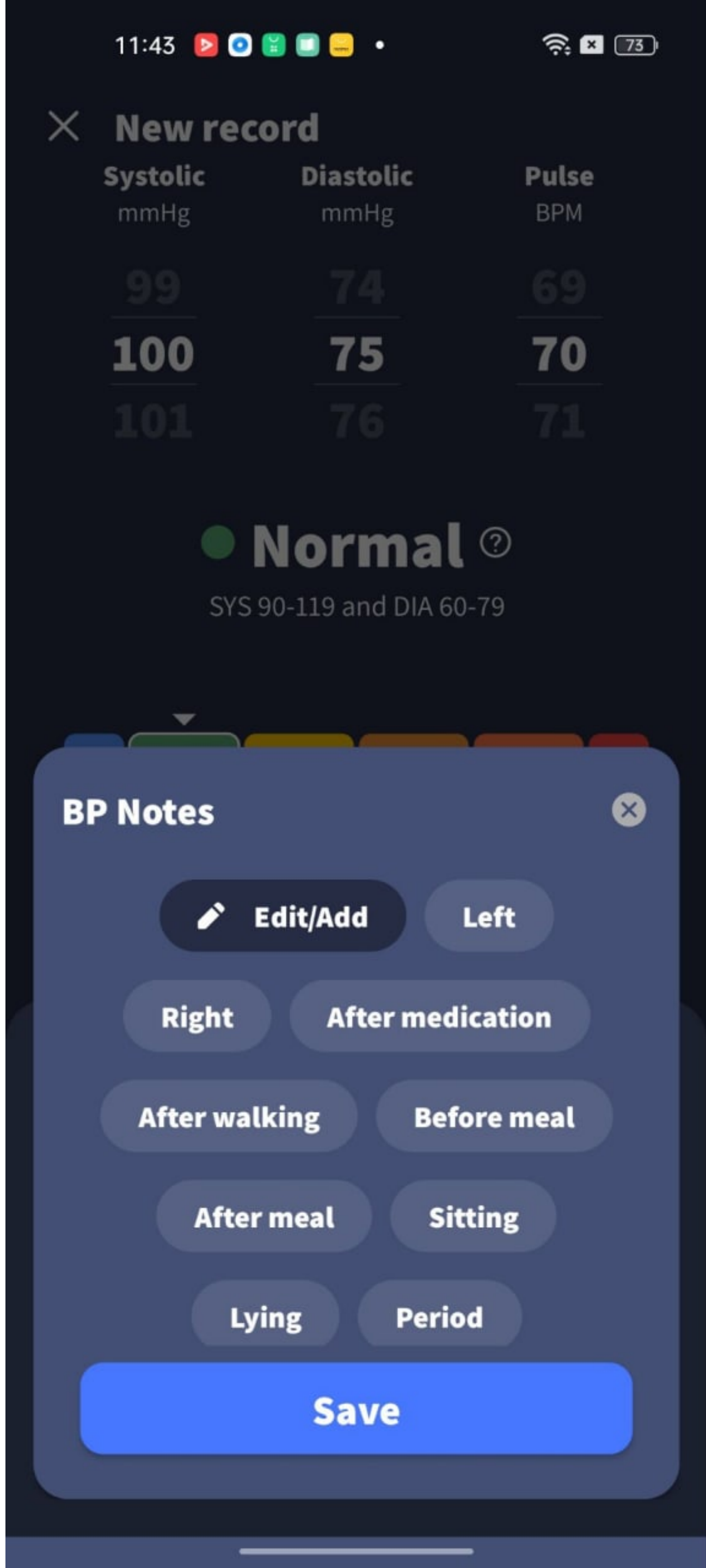
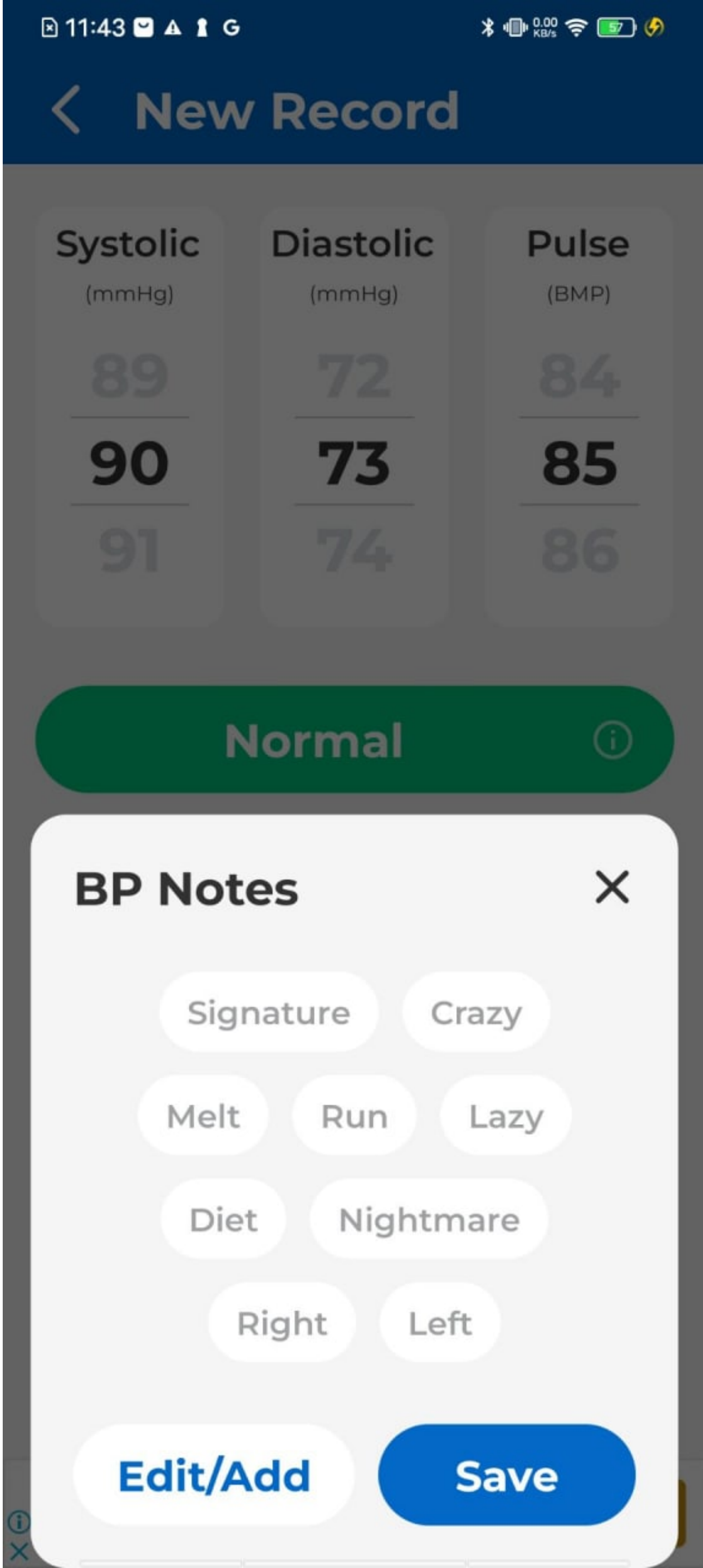
E
Everyone ⓘ

Install

Add to wishlist

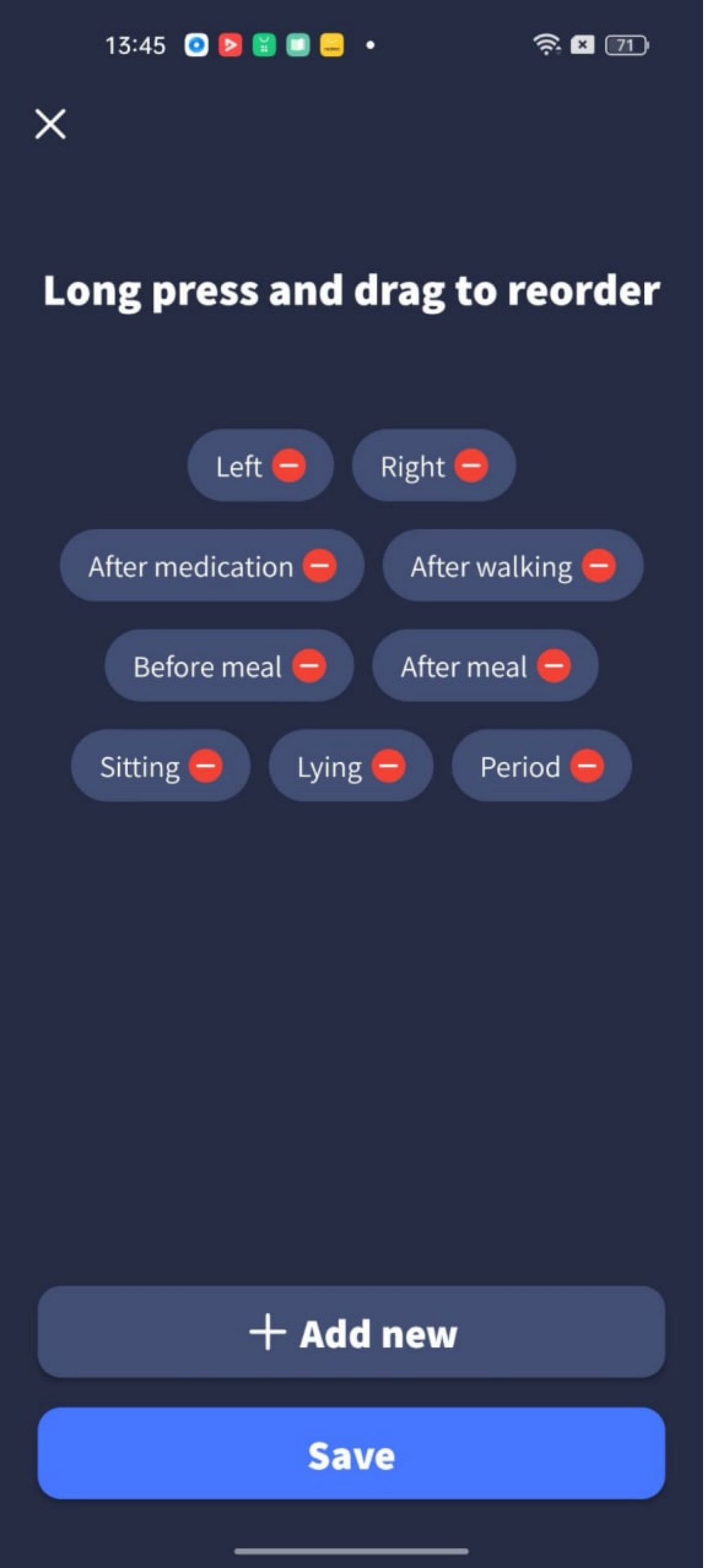
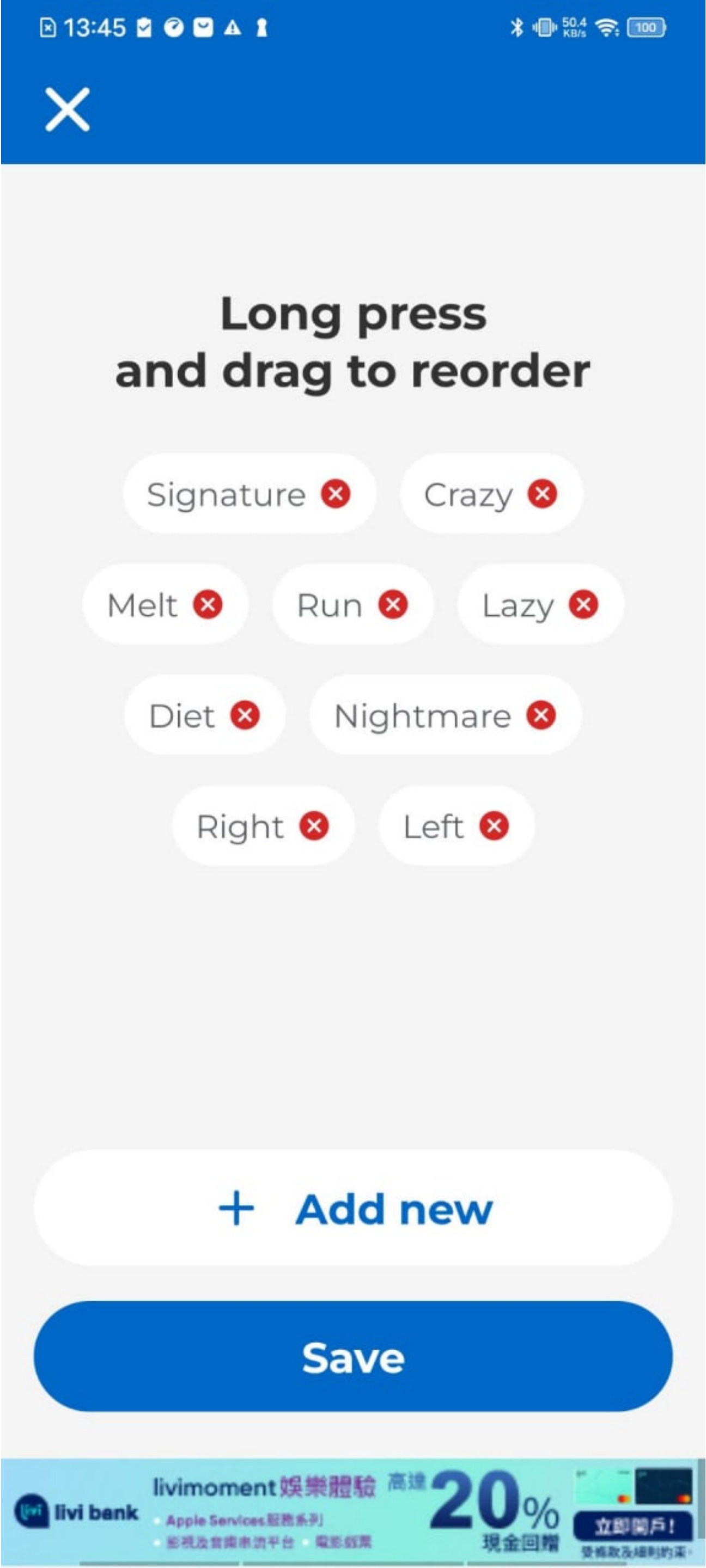


Note页面
弹窗的卡片排版居中效果一致



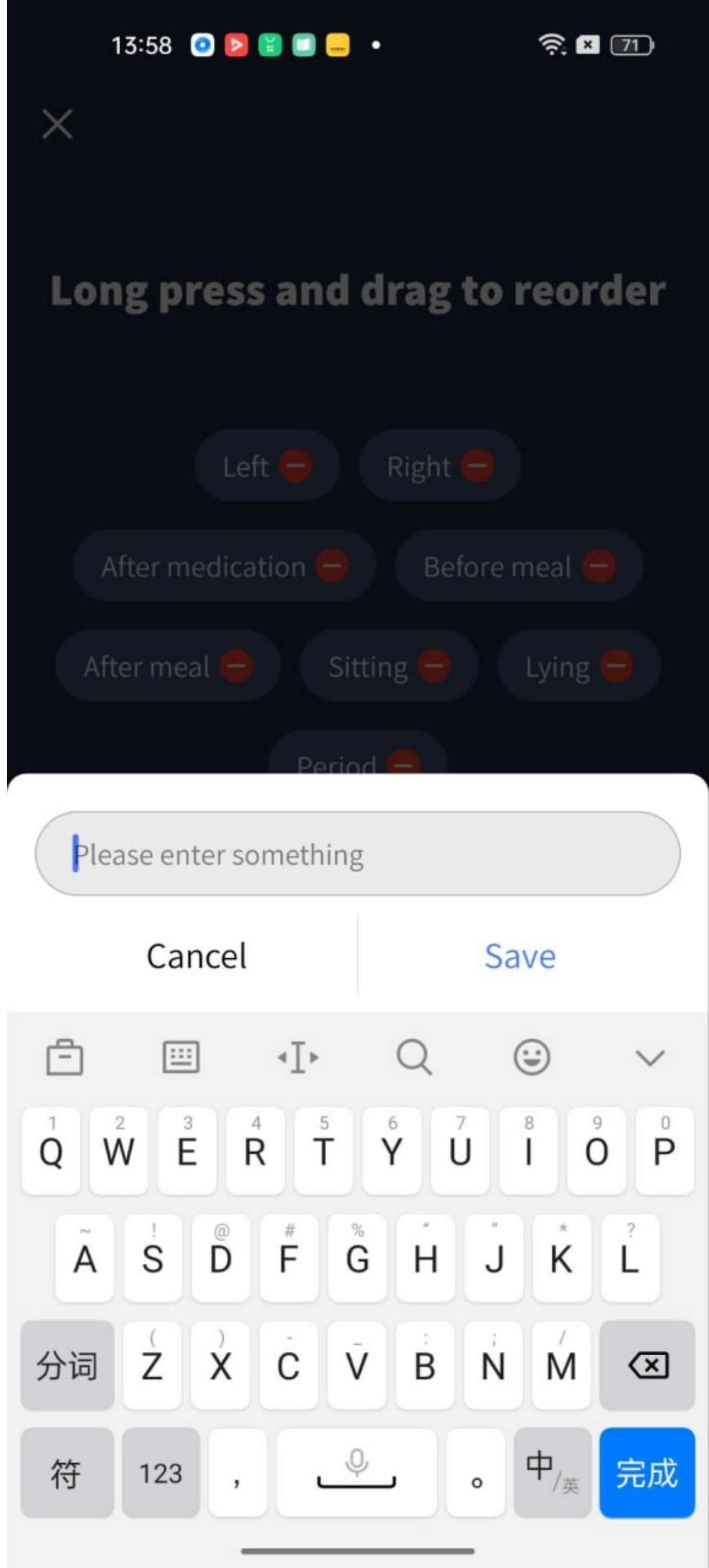
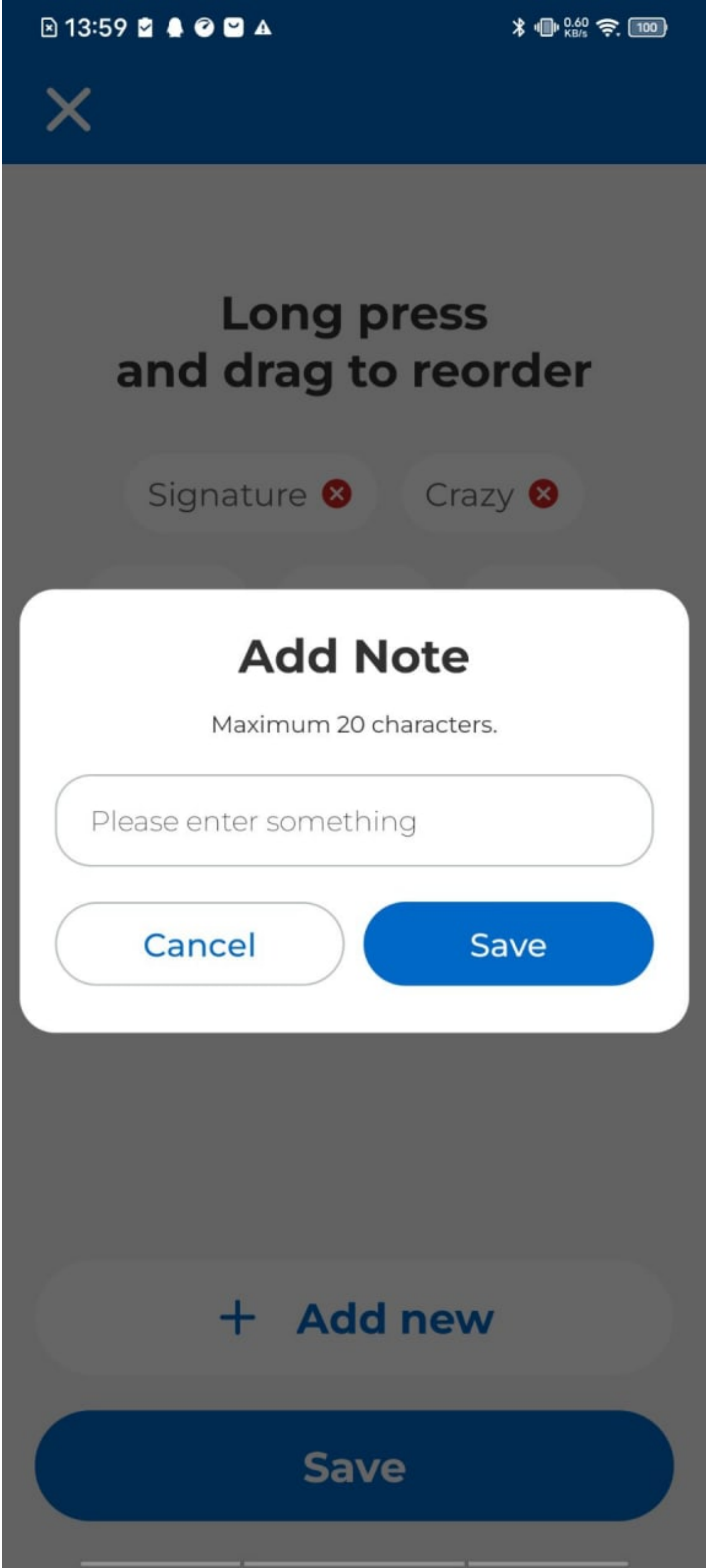
左抄袭右我们

Edit note页面
排版一致



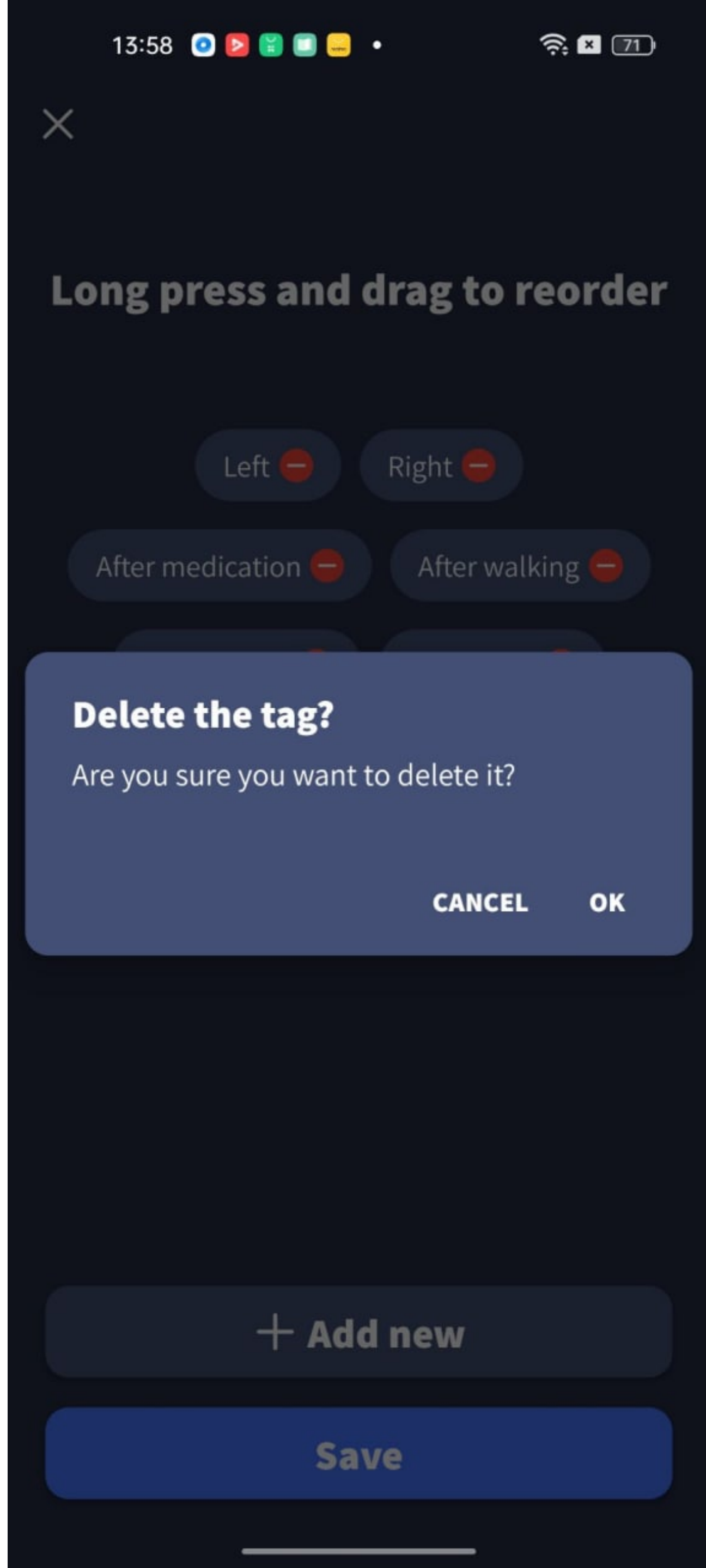
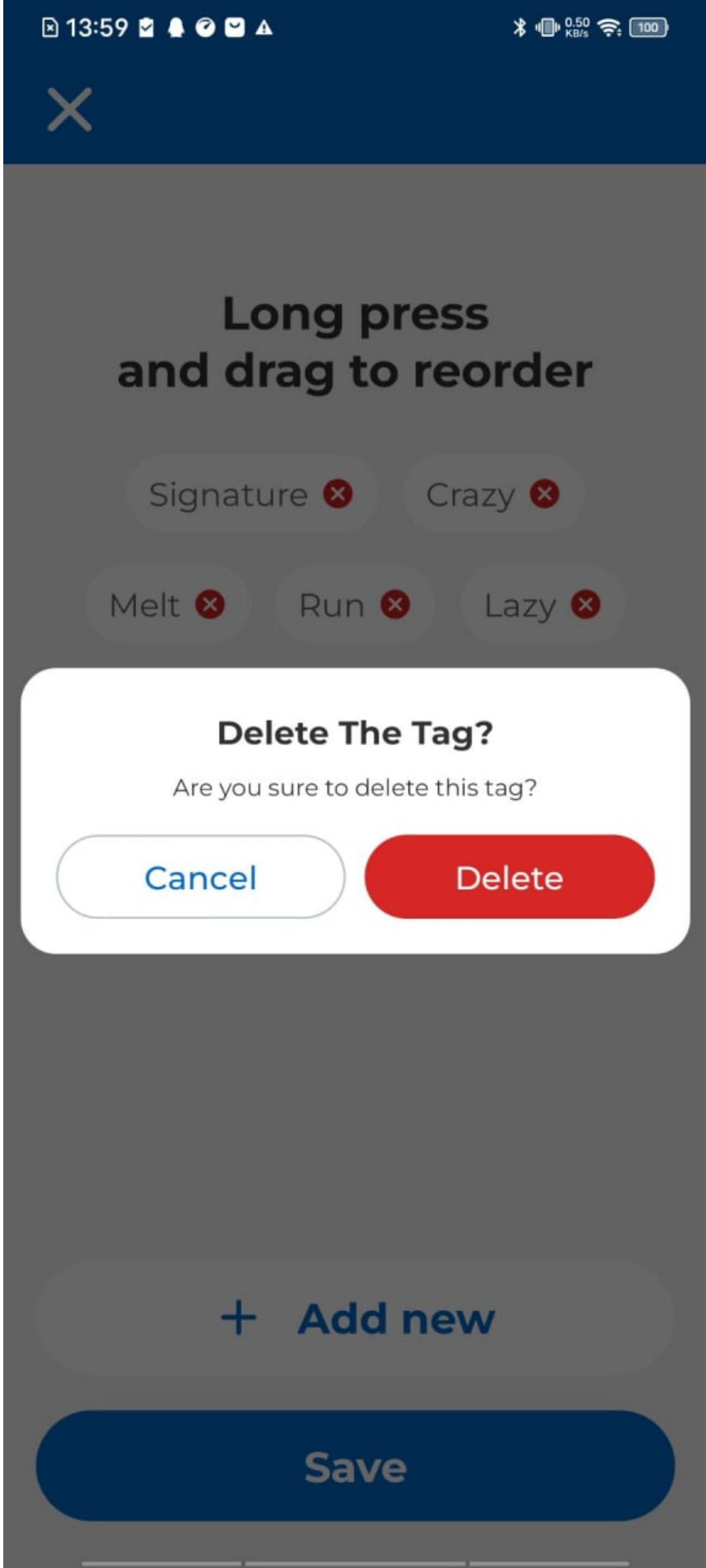
左抄袭右我们

输入内容文案一致



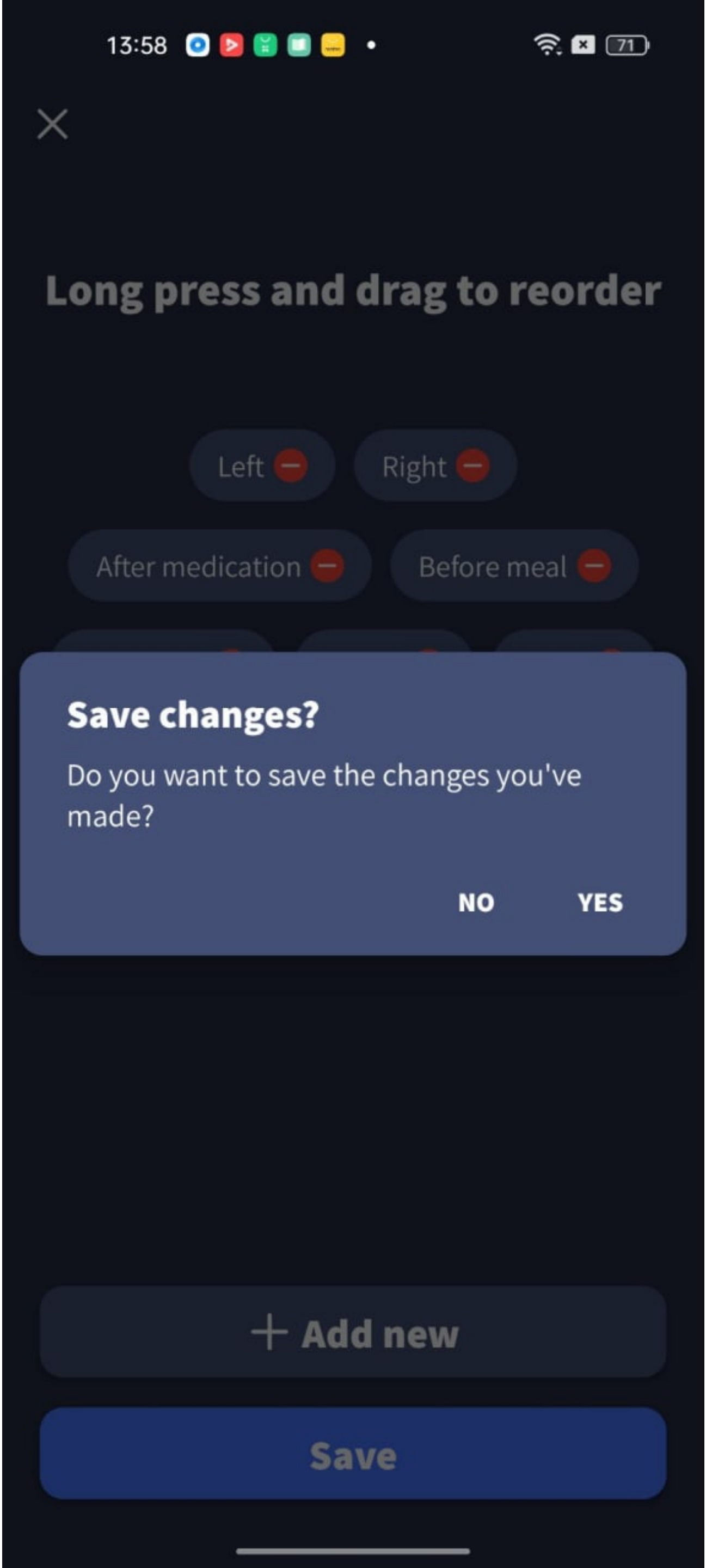
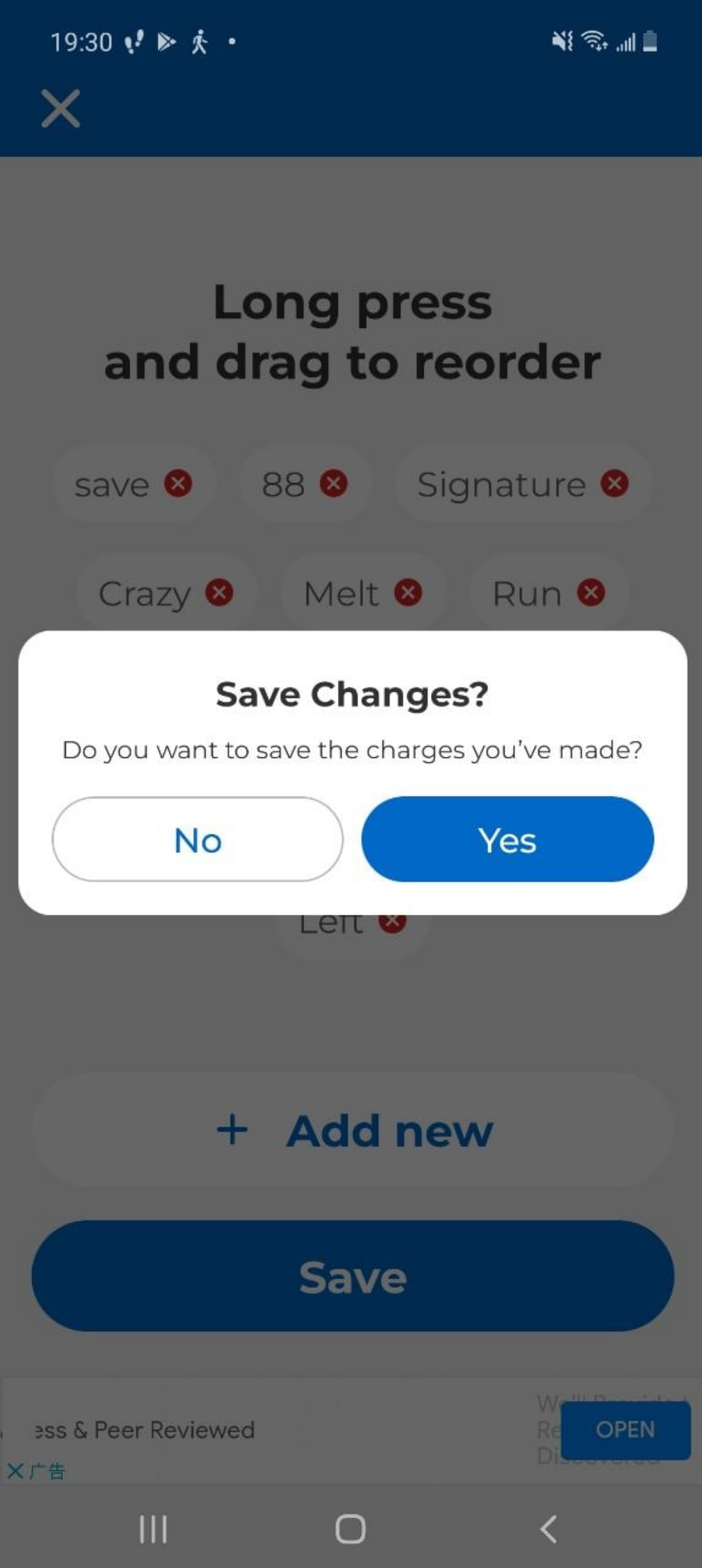
左抄袭右我们

删除标签弹窗文案相似



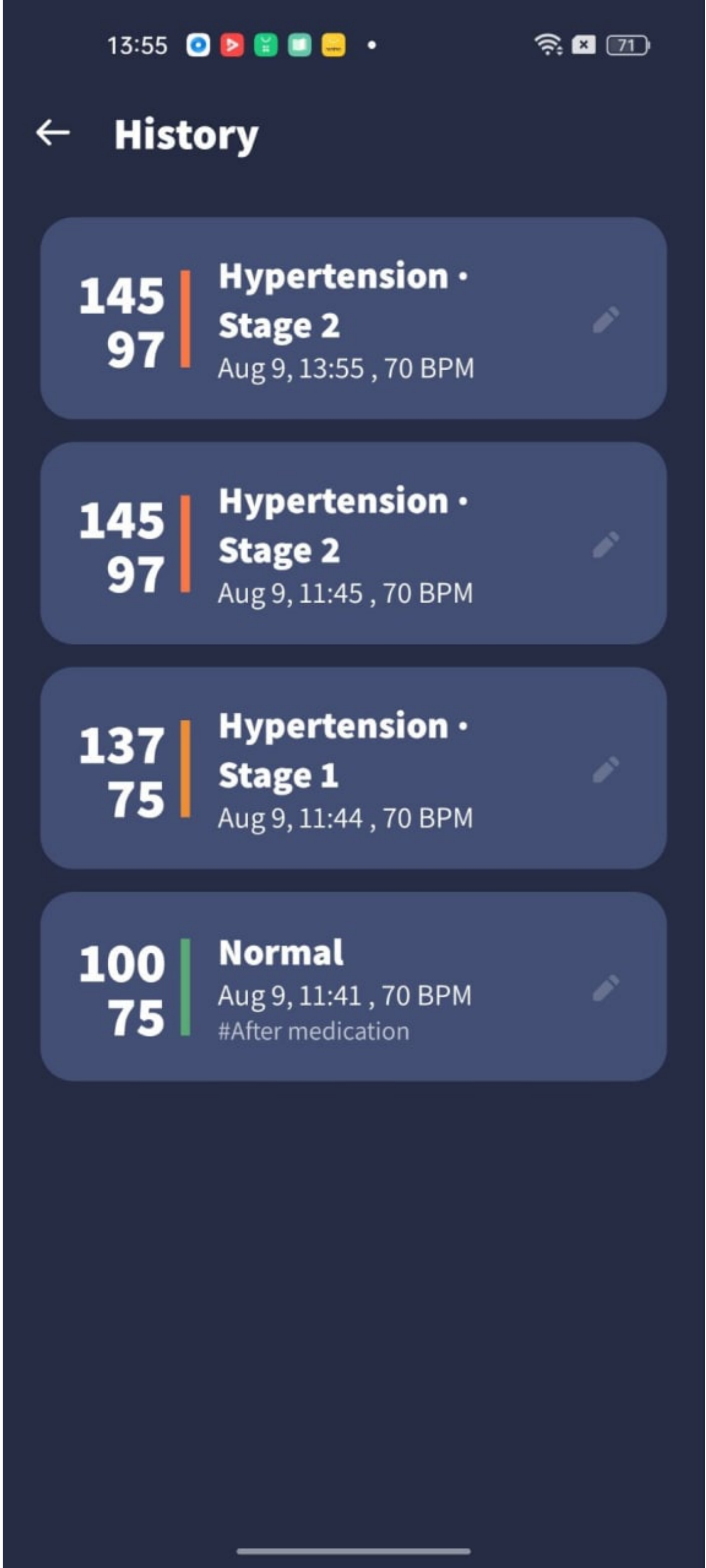
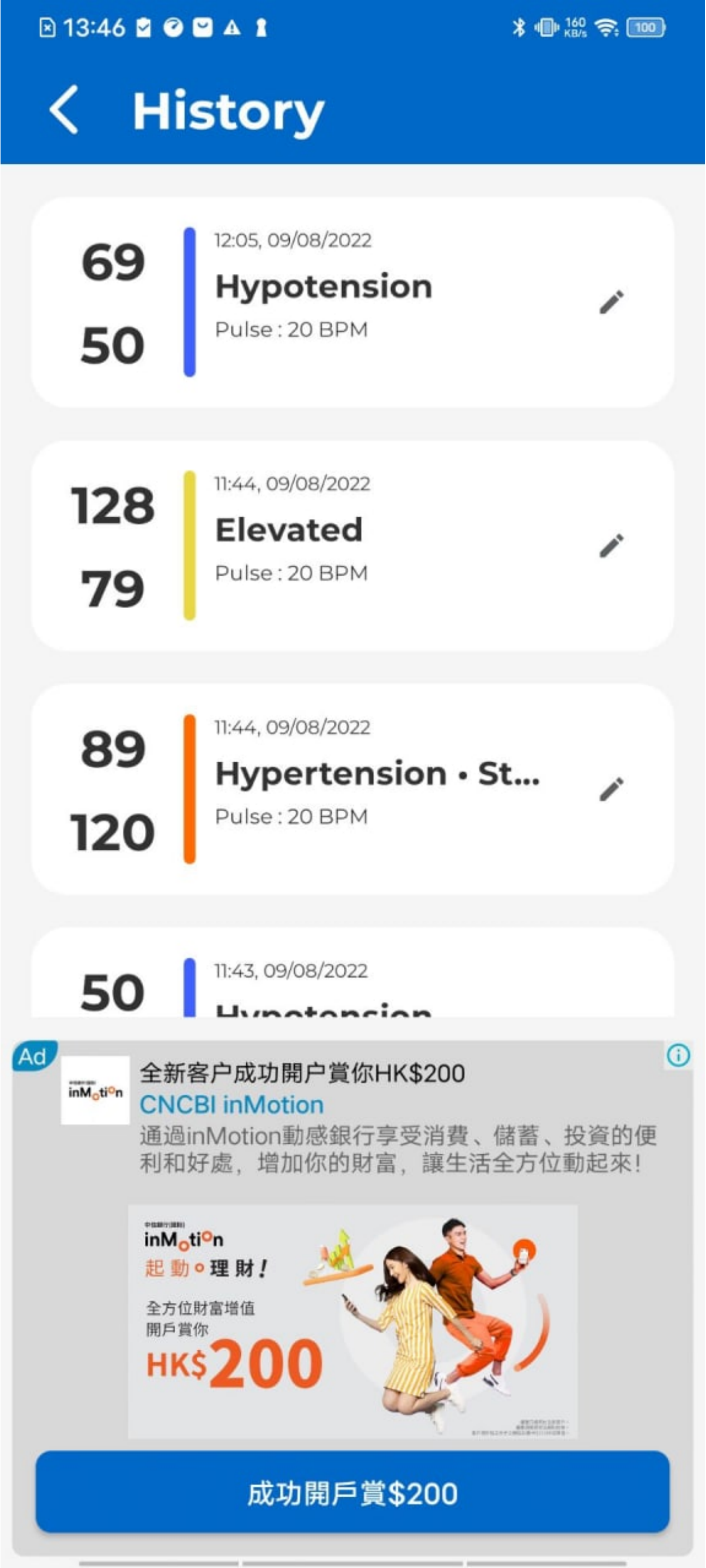
左抄袭右我们

保存更改弹窗文案一致



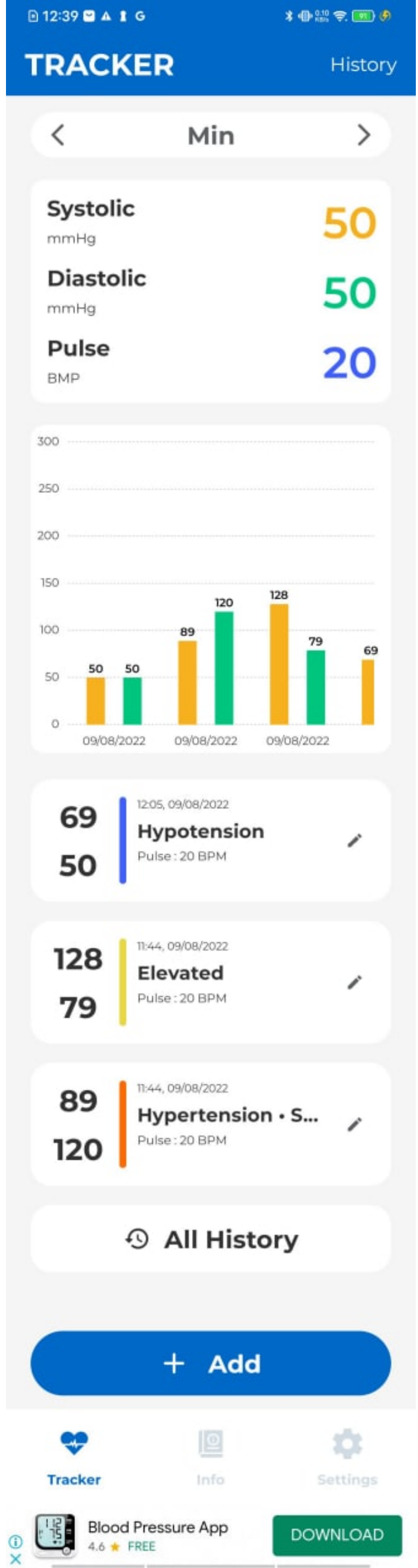
左抄袭右我们

历史列表的排版一致 卡片排版一致



左抄袭右我们

Tacker页面
结构一致 历史卡片内容排版一致



左抄袭右我们

EXHIBIT D

From: removals@google.com <removals@google.com>
Sent: Friday, December 23, 2022 12:33 PM
To: David Silver <david@bayramoglu-legal.com>
Subject: Re: Your Request to Google [9-1815000033310]

Hello,

We received a counter notification, as described in 17 U.S.C. § 512(g), in response to your Digital Millennium Copyright Act (DMCA) notice. Below is a text copy of the counter notification. We await your notice within 10 business days that you have filed either an action that seeks a court order to restrain the counter notifier's allegedly infringing activity or a claim of infringement against the counter notifier with the US Copyright Office Copyright Claims Board (CCB). To process your complaint, we need a copy of one of the following:

- Action filed
- CCB claim filed
- Applicable court order
- Applicable determination of infringement from the CCB

If we don't receive such notice from you, we'll reinstate the material in question.

For more information about the DMCA and the requirements of a counter notice, review [DMCA policy and law](#). If you have legal questions about this, consult your own legal counsel.

=====

Quốc gia cư trú

Vietnam

Họ và tên hợp pháp

Hau Duong

Danh xưng của bạn

Hau Duong

Tên công ty

Apero

Địa chỉ email liên hệ

haudt@apero.vn

Địa chỉ

Hanoi, Vietnam

Số điện thoại

+84397554828

URL của nội dung đang được đề cập đến

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker>

Nhà phát triển

Apero Technologies Group - TrustedApp

Tên ứng dụng

Blood Pressure Tracker

Tại sao bạn lại yêu cầu khôi phục?

Chọn một trong các lựa chọn bên dưới.

Tôi là chủ sở hữu nội dung

Vui lòng cung cấp thêm chi tiết để xác minh yêu cầu của bạn

After carefully checking, I am SURE 100% that my app has NOT violated this law. The suspend action taken is too severe with my app, because of reasons below:

Fist: Their app has not yet provided proof of owning the copyright. They have NO intellectual property registration for this property

Second: My app is NOT the same in terms of UI and content in the app compared to their app, including from color, text to design and content. This is an application my team research and develop. We do everything ourselves including: code, ui/ux, graphics, content.. We can provide our own UIUX designs at figma link:

<https://www.figma.com/file/AxZbdf6uhx6tMD2QuKAVFK/Blood-Pressure>

And this is my app developed in android studio:

https://drive.google.com/drive/folders/1dKv3LbKrUBgBlrUz_9z0zRxRxOQmPJJs

So I think the DMCA notice is a not fair with me.

I hope the Google Play team will double check this issue, and RESTORE my app on Google Play Store. Thank you!

Tôi đồng ý với quyền tài phán của Tòa án liên bang đối với khu vực pháp lý nơi tôi sinh sống (hoặc Quận Bắc California nếu địa chỉ của tôi ở ngoài Hoa Kỳ) và tôi sẽ chấp nhận tổng đạt trát tòa từ cá nhân cung cấp thông báo theo tiểu mục (c)(1)(C) hoặc người đại diện cho cá nhân đó.

Đánh dấu để xác nhận

Tôi xin thề, chấp nhận bị trừng phạt nếu khai man, rằng tôi thực sự tin là nội dung được xác định ở trên đã bị xóa hoặc vô hiệu hóa do nhầm lẫn hoặc xác định sai tài liệu cần bị xóa hoặc vô hiệu hóa.

Đánh dấu để xác nhận

Chữ ký

Hau Duong

=====

Regards,

The Google Team

Report alleged copyright infringement

Country of residence

United States

Full legal name

David Silver

Company name

Bayramoglu Law Offices LLC

Full legal name of the copyright holder you represent

JIAO MINGYANG

Contact email address

david@bayramoglu-legal.com

Identify and describe the copyrighted work

We had filed a previous DMCA Takedown Request for this application, and Google claimed it could not find the infringing material and requested additional evidence. When we provided the additional evidence, Google said it would not consider additional evidence and required us to submit a new DMCA Takedown Request. Google then proceeded to ignore all of our later [correspondence](#). So here we are filing a second DMCA Takedown Request as there are still multiple text and user interface layout that infringes on our client's copyrights, which can be seen in the supplemental material attached. Please take the appropriate action in accordance with the DMCA.

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker>

Attach a screenshot of the allegedly infringing material

Supplementary Material.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

Please check to confirm

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Please check to confirm

I understand that a copy of the notice may be sent to the developer of the affected content.

Please check to confirm

Signature

David Silver

EXHIBIT E

----- Forwarded message -----

From: <removals@google.com>

Date: Tue, Oct 25, 2022 at 12:23 AM

Subject: Re: Your Request to Google [5-3967000033498]

To: <deepthought7.5m@gmail.com>

Hello,

Thanks for reaching out to us.

We've decided not to take action on this content. You could send your request straight to the individual who posted the content.

If you need more information about the individual who posted the content, you'll need to serve us with valid legal process. For more information about this, contact us at google-legal-support@google.com from the U.S., or internationalcivil@google.com from outside the U.S.

If you pursue legal action and the content is found to be illegal or ordered to be removed, you can send us the court order seeking removal using [this form](#).

Regards,

The Google Team

For more information about our content removal process access q.co/legal.

Report alleged copyright infringement

Country of residence

Singapore

Full legal name

Sherry Smith

Full legal name of the copyright holder you represent

QR Code Scanner.

Contact email address

deepthought7.5m@gmail.com

Identify and describe the copyrighted work

Dear Team,

I'm writing to report that an infringing app badly 100% Copied our original In-app Texts and UI Design WITHOUT any change. This high degree of coincidence is by no means an accident. We created all In-app Text by ourselves, we can provide all source evidence if needed.

Pursuant to Section 512(c) of the Digital Millennium Copyright Act("DMCA"), we would like to request immediate removal of this infringing app from the Google Play platform.

Many thanks in advance.

Regards,

Sherry

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker&hl=en&gl=us>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=bloodpressureapp.bloodpressuremonitor.bloodpressuretracker>

Attach a screenshot of the allegedly infringing material

Violation Material.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

Please check to confirm

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Please check to confirm

I understand that a copy of the notice may be sent to the developer of the affected content.

Please check to confirm

Signature

Sherry Smith


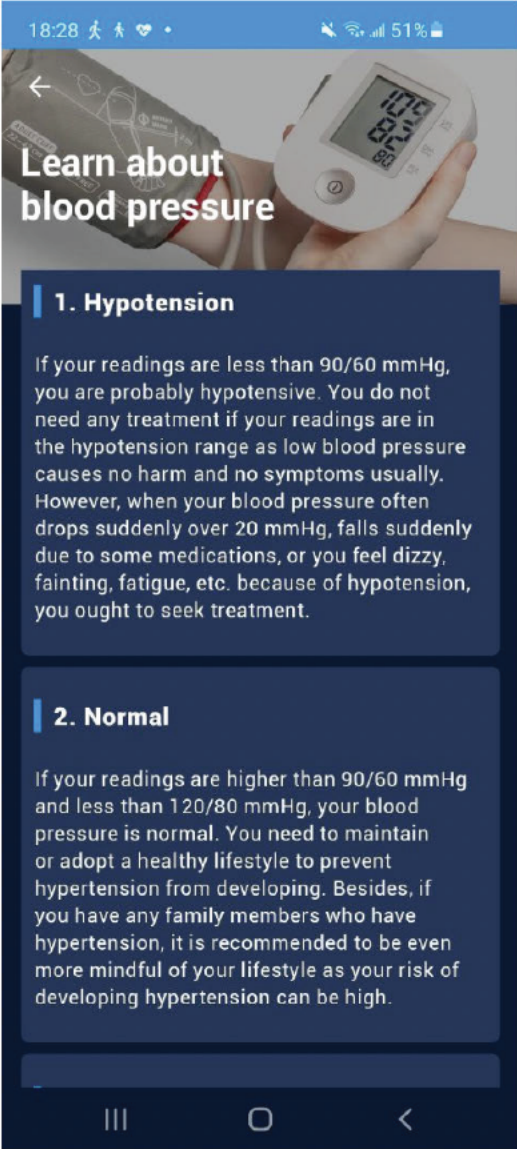
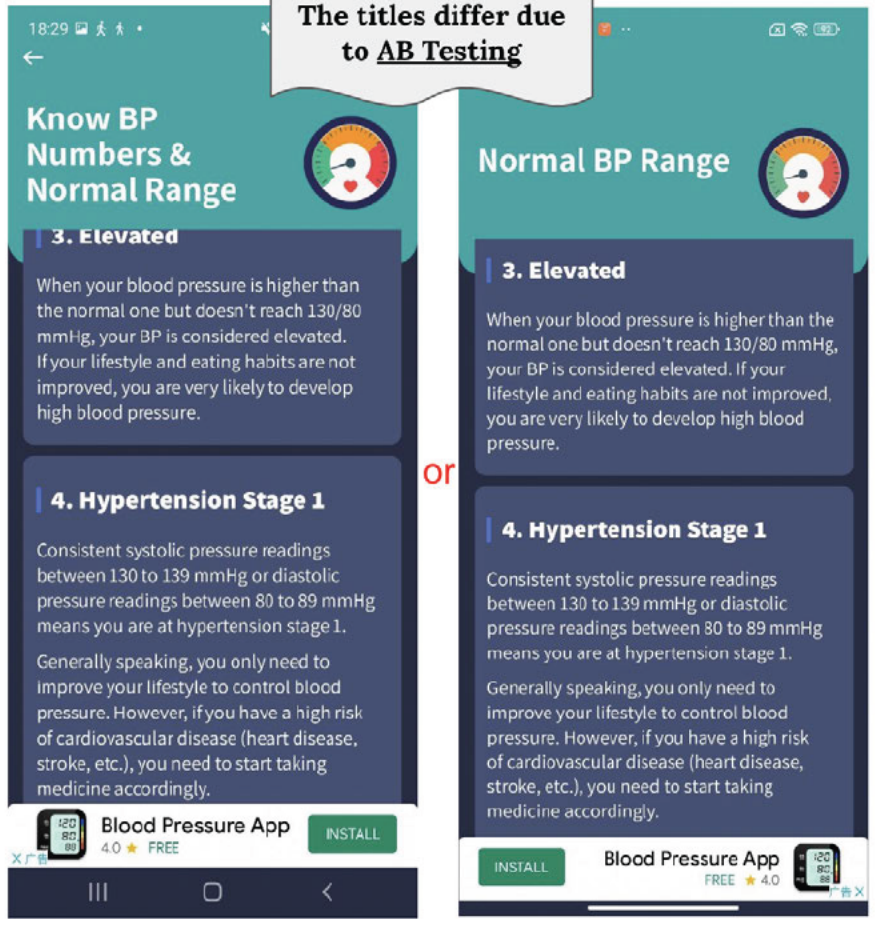
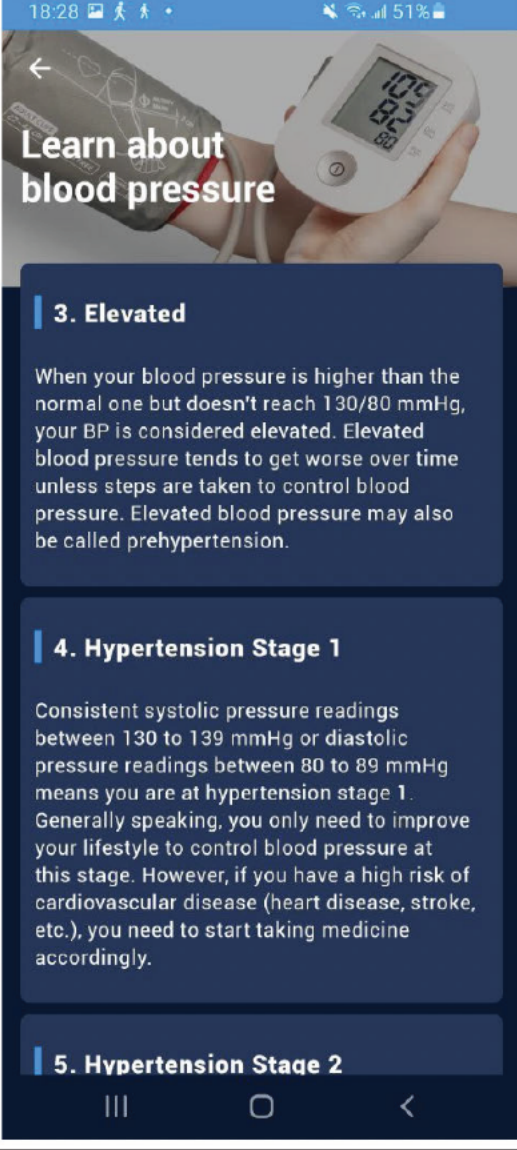
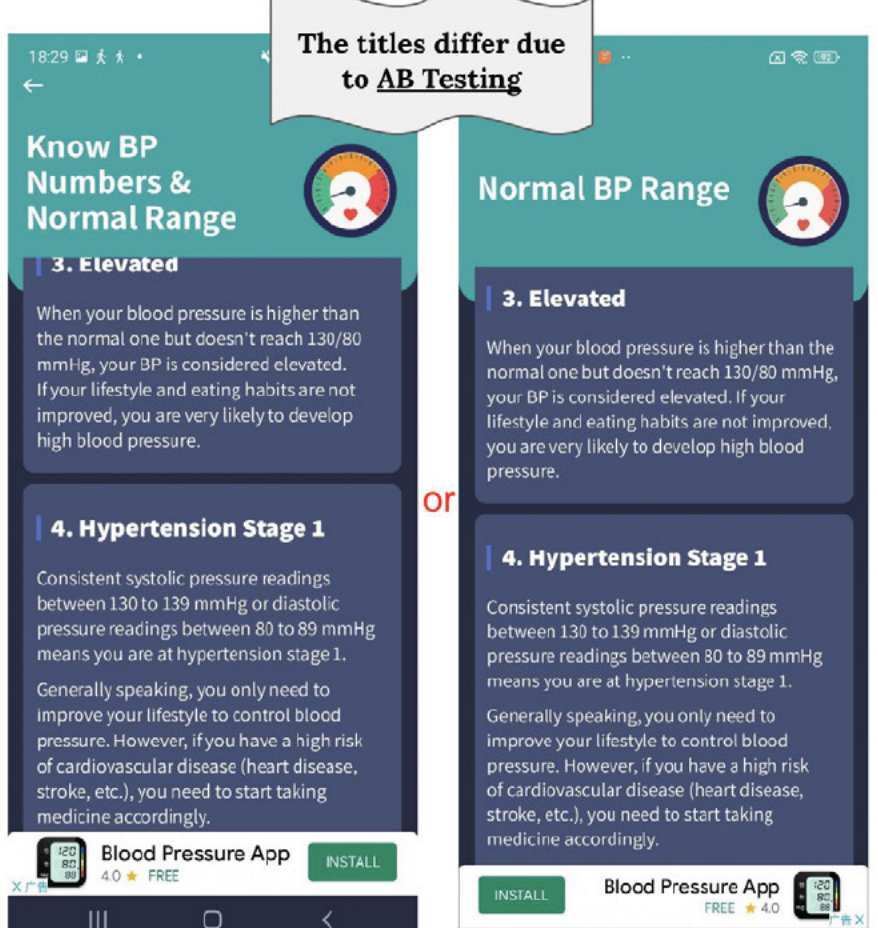
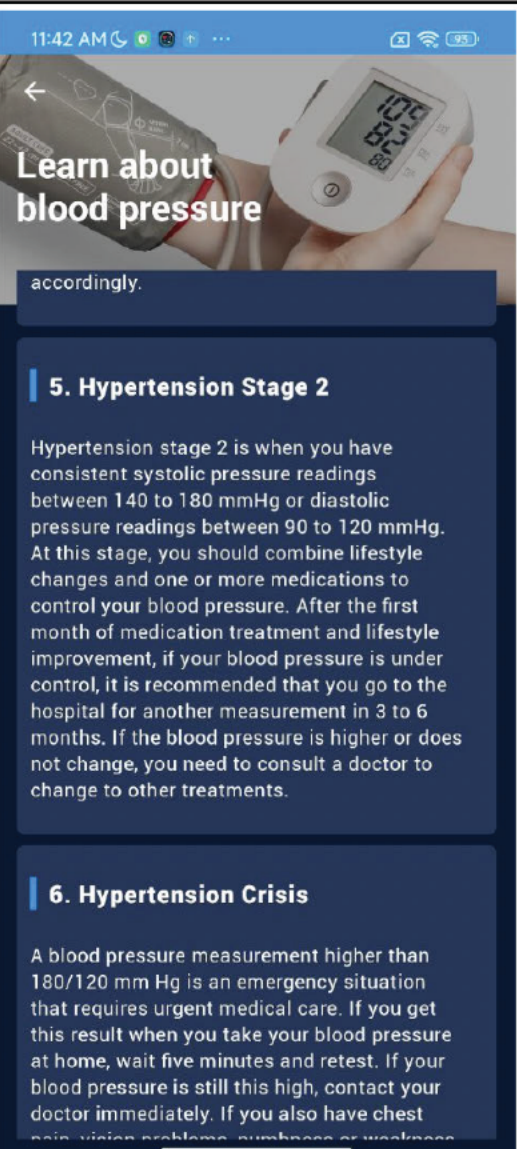
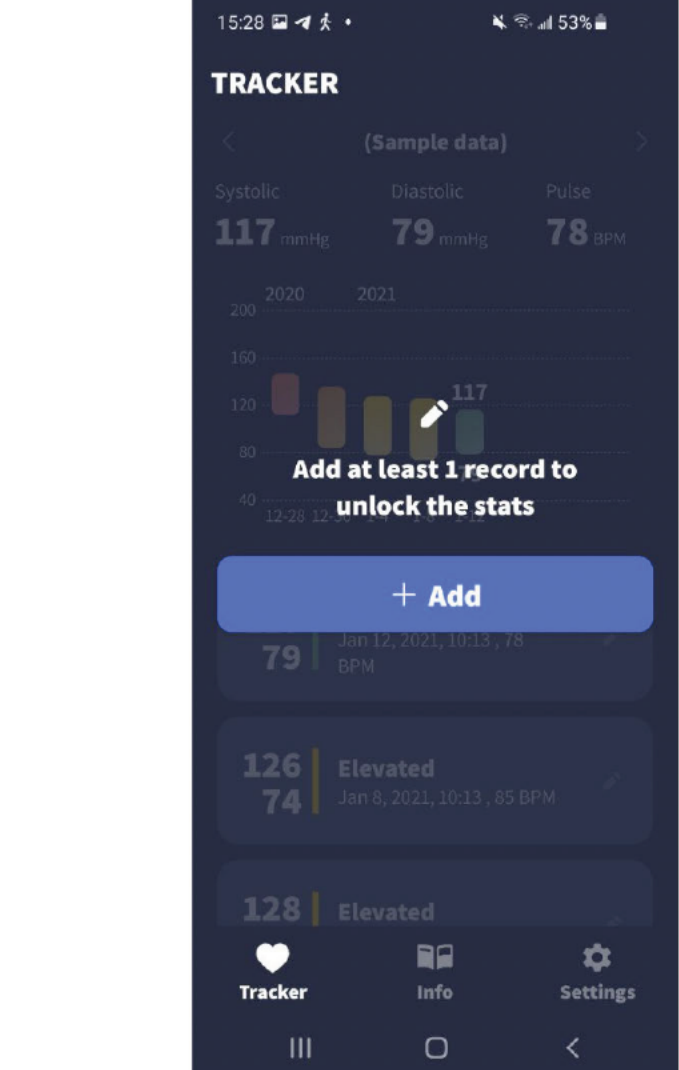
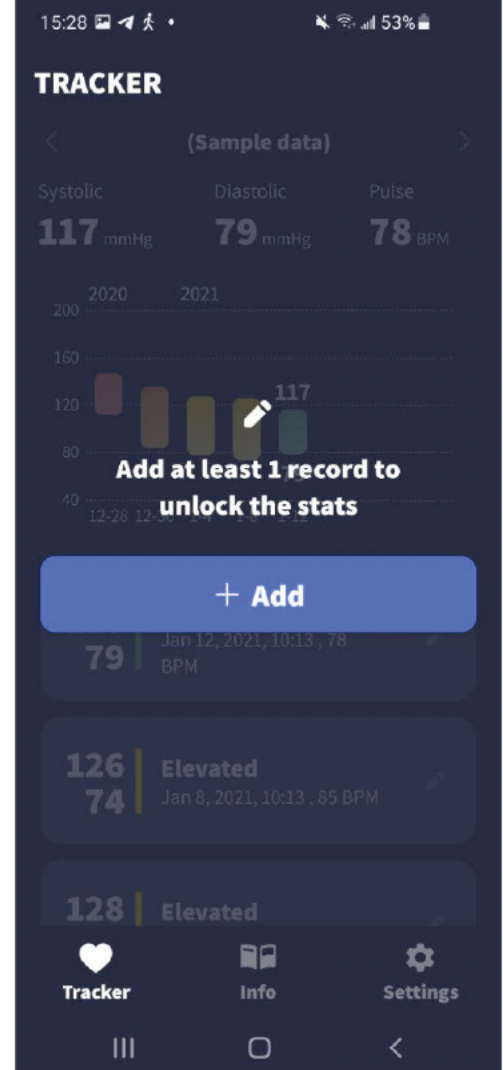
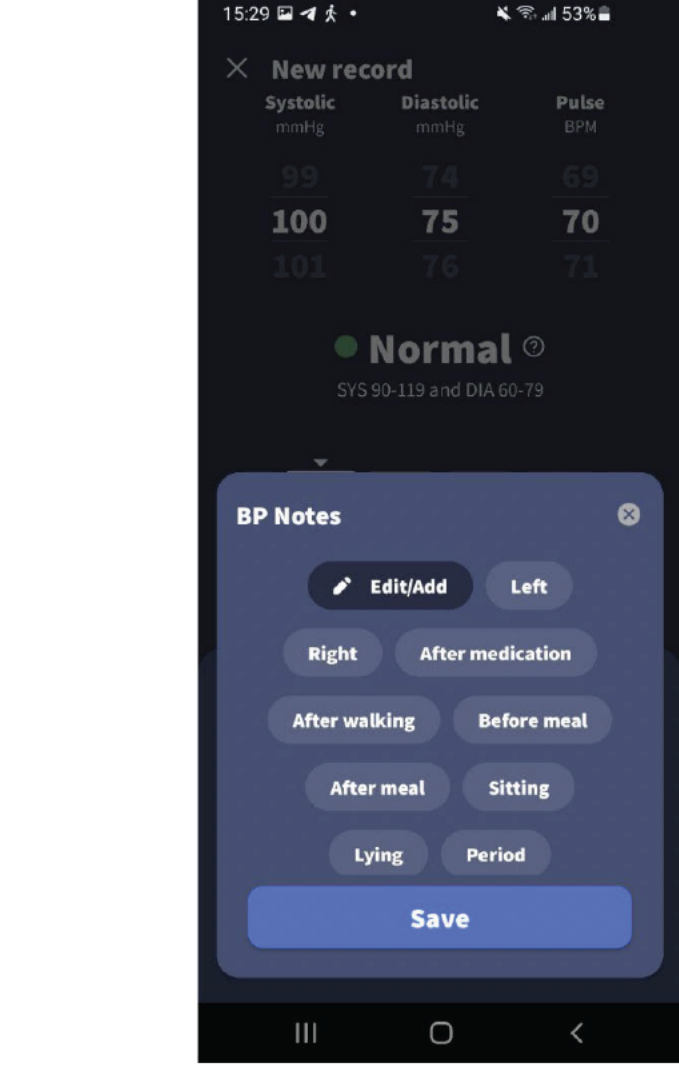
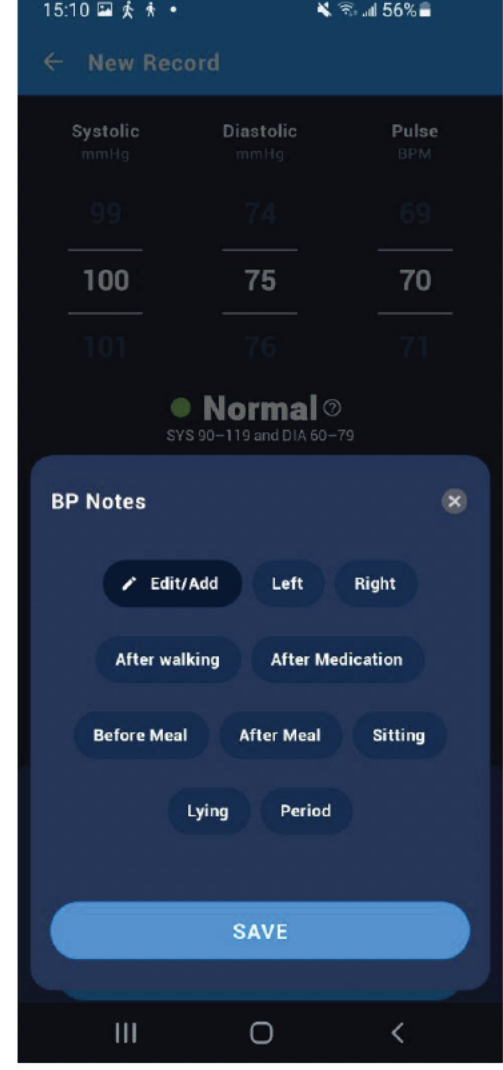
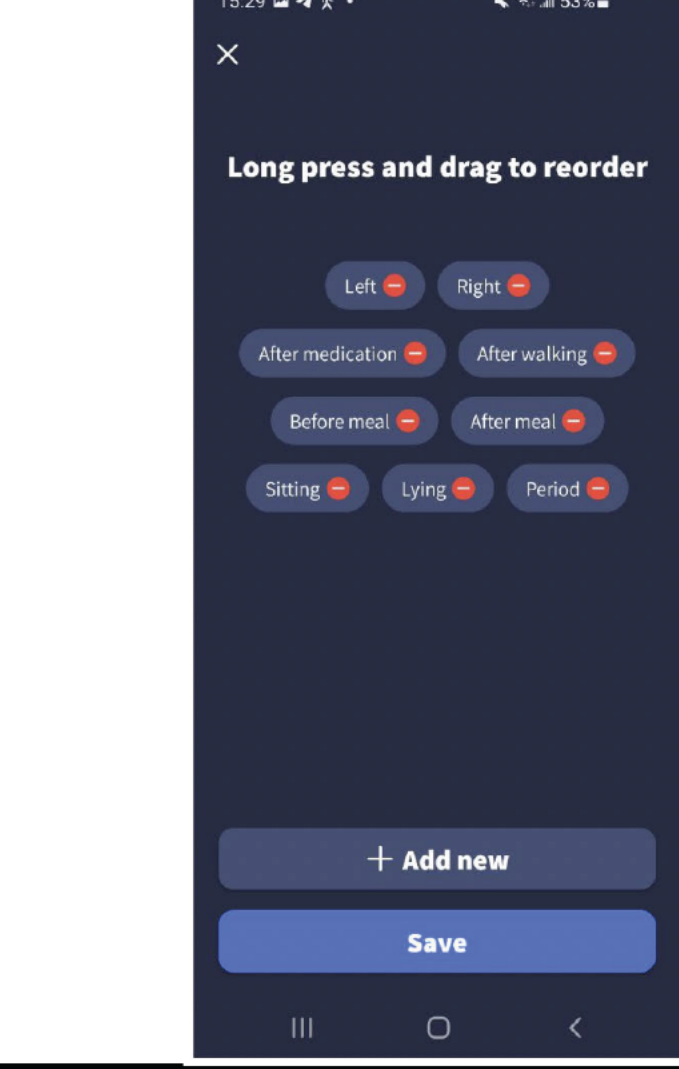
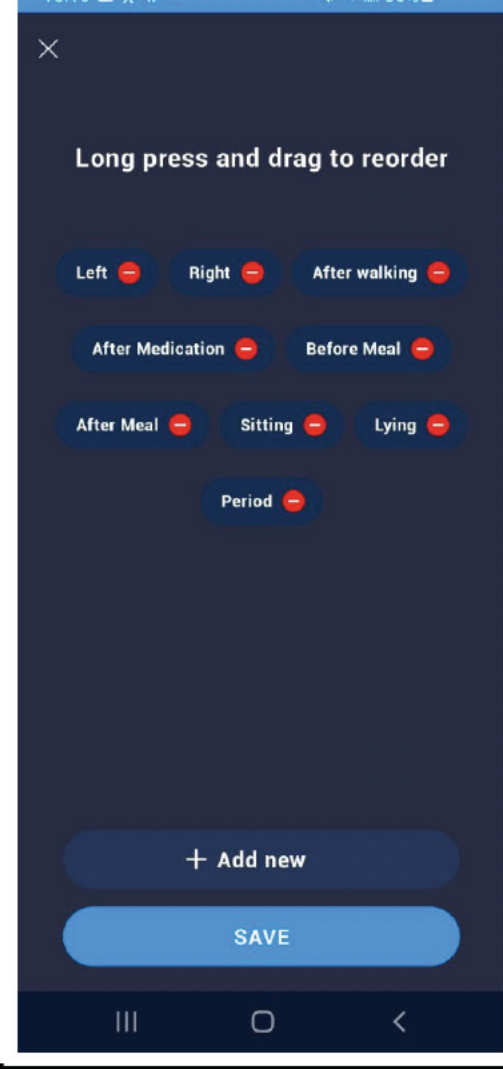
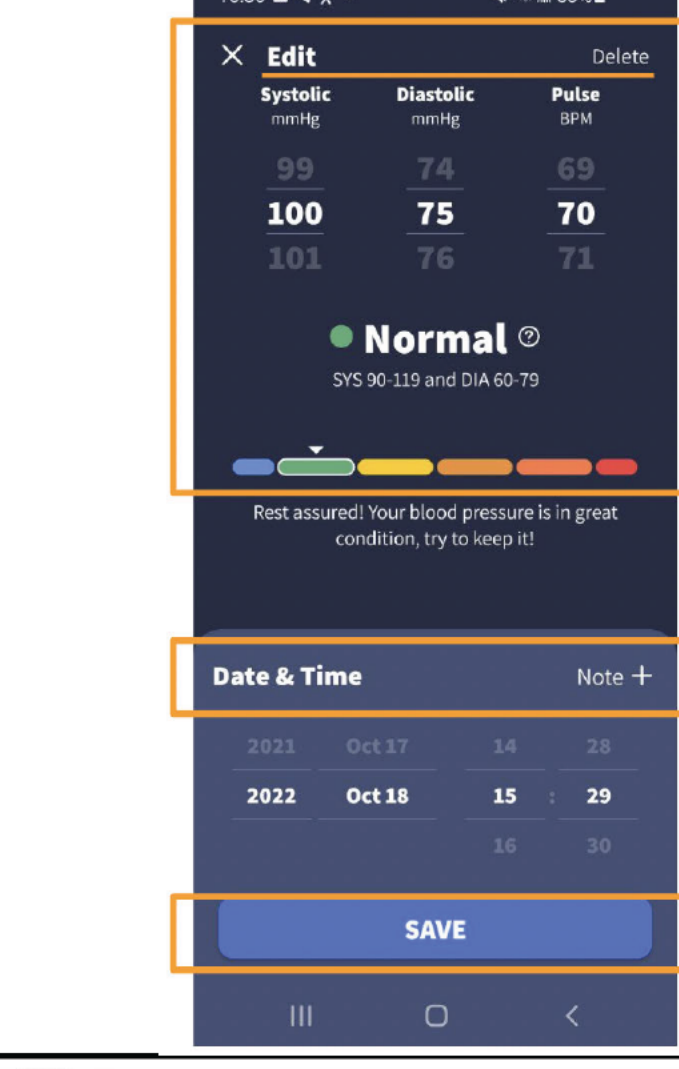
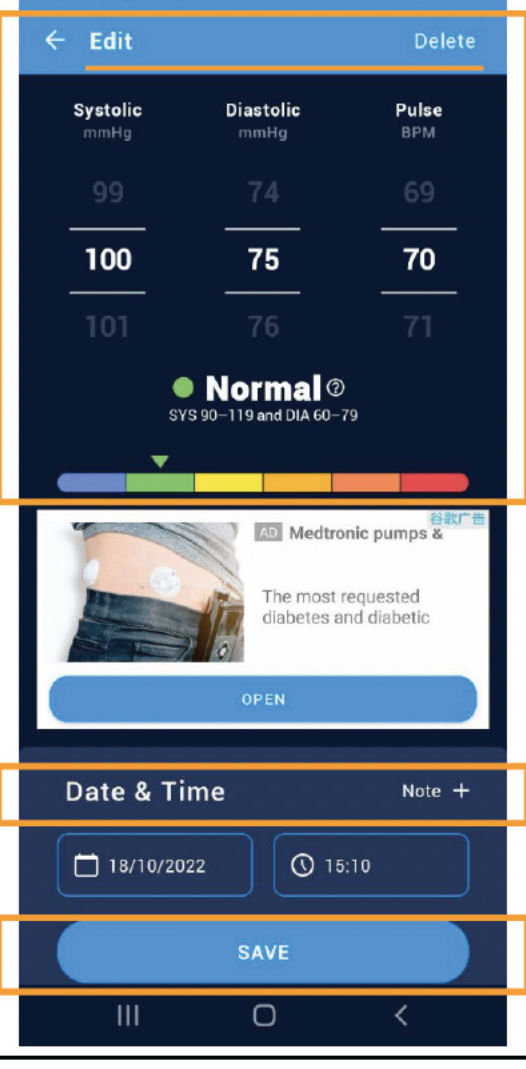
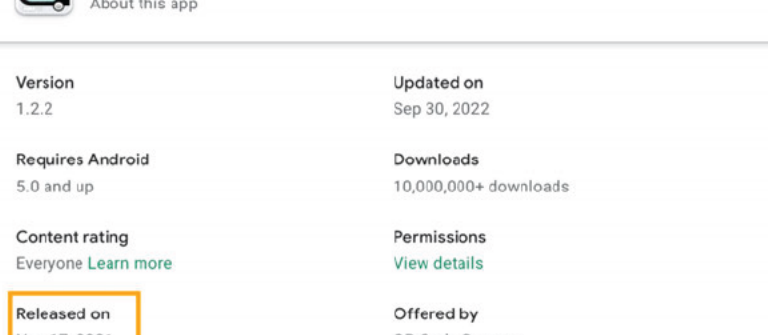
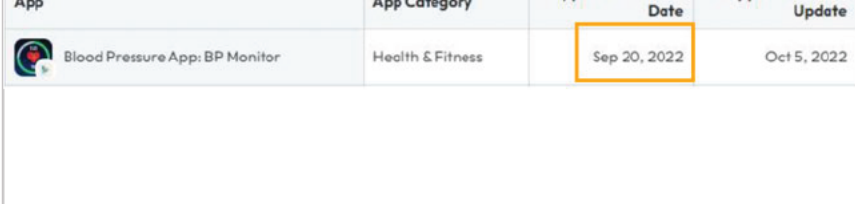
	Our Original Creatives	Infringing Copies
<p>100% the Same</p> <p>Totally the same copies of our articles as shown at right</p>		
<p>100% the Same</p> <p>Totally the same copies of our articles as shown at right</p>		
<p>100% the Same</p> <p>Totally the same copies of our articles as shown at right</p>		
<p>100% the Same</p> <p>Totally the same copies of our user interface as shown at right</p>		
<p>100% the Same</p> <p>Totally the same copies of our user interface as shown at right</p>		
<p>100% the Same</p> <p>Totally the same copies of our user interface as shown at right</p>		
<p>100% the Same</p> <p>Totally the same copies of our user interface as shown at right</p>		
<p>Our app was copyright protected for the EARLIER RELEASE</p>		

EXHIBIT F

----- Forwarded message -----

From: <removals@google.com>

Date: Thu, Dec 1, 2022 at 11:08 PM

Subject: Re: Your Request to Google [2-7084000033674]

To: <deephought7.5m@gmail.com>

Hello,

Thanks for reaching out to us.

We've decided not to take action on this content. You could send your request straight to the individual who posted the content.

If you need more information about the individual who posted the content, you'll need to serve us with valid legal process. For more information about this, contact us at google-legal-support@google.com from the U.S., or internationalcivil@google.com from outside the U.S.

If you pursue legal action and the content is found to be illegal or ordered to be removed, you can send us the court order seeking removal using [this form](#).

Regards,

The Google Team

For more information about our content removal process access g.co/legal.

Report alleged copyright infringement

Country of residence

Singapore

Full legal name

Sherry Smith

Full legal name of the copyright holder you represent

QR Code Scanner.

Contact email address

deephought7.5m@gmail.com

Identify and describe the copyrighted work

QR Code Scanner. is the Copyright owner of the source code and articles in the app.

The developer "Begamob Global" maliciously copied our string text on source code and in-app articles & UI design WITHOUT any changes.

We created all source code and articles by ourselves, we can provide all of the source evidence if needed. The infringing apps violated the Copyright basic protection, bringing negative impact.

Pursuant to Section 512(c) of the Digital Millennium Copyright Act ("DMCA"), we would like to request an immediate removal of these infringing apps from the Google Play platform. Your assistance in this matter is highly appreciated.

Details of our copyrighted applications and the infringing evidence are on the attachment. Many thanks in advance.

Regards,

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker&gl=us>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressure.tracker.app.bpmonitor.bptracker&gl=us>

Attach a screenshot of the allegedly infringing material

BP Infringement Material.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

Please check to confirm

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Please check to confirm

I understand that a copy of the notice may be sent to the developer of the affected content.

Please check to confirm

Signature

Sherry Smith

----- Forwarded message -----

From: <removals@google.com>
Date: Tue, Dec 13, 2022 at 10:08 PM
Subject: Re: Your Request to Google [9-3832000033281]
To: <deepthought7.5m@gmail.com>

Hello,

Thanks for reaching out to us.

Regarding the following URLs:

<https://play.google.com/store/apps/details?id=com.bloodpressure.tracker.app.bpmonitor.bptracker>

We note that the developer in question has provided contact information in their application listing. Please confirm that you have first attempted to resolve this issue with the developer of the application in question by contacting them at info@begamob.com.

Regards,

The Google Team

For more information about our content removal process access g.co/legal.

Report alleged copyright infringement

Country of residence

Singapore

Full legal name

Ada Lee

Full legal name of the copyright holder you represent

QR Code Scanner.

Contact email address

deepthought7.5m@gmail.com

Identify and describe the copyrighted work

This infringing app uses our in-app articles without authorization.

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressure.tracker.app.bpmonitor.bptracker>

Attach a screenshot of the allegedly infringing material

Infringement Material_1209.pdf

Report Intentional Plagiarism of Copyrighted In-app Articles



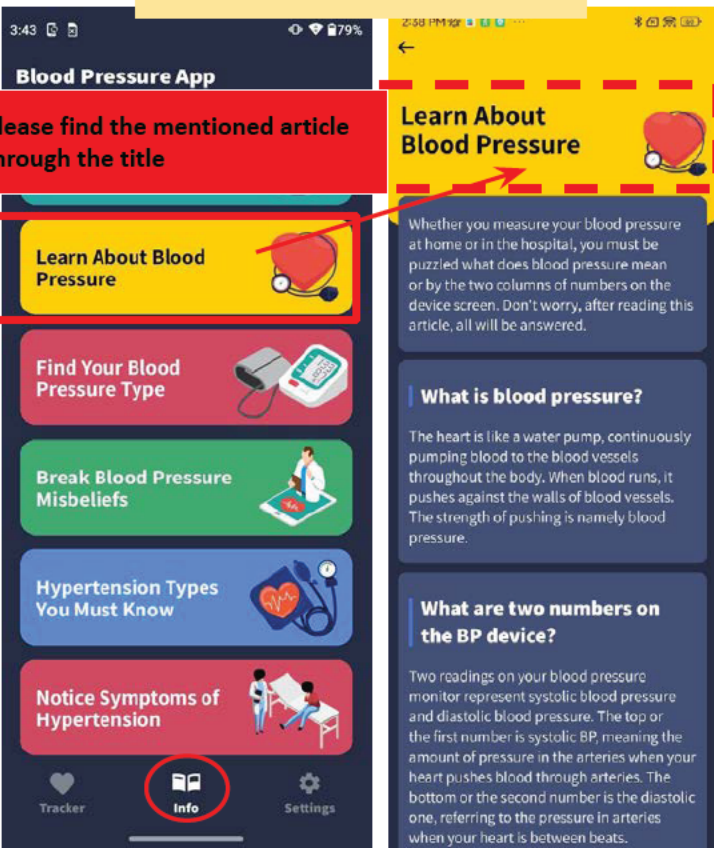
[Infringement Link](#)

Blood Pressure Tracker App

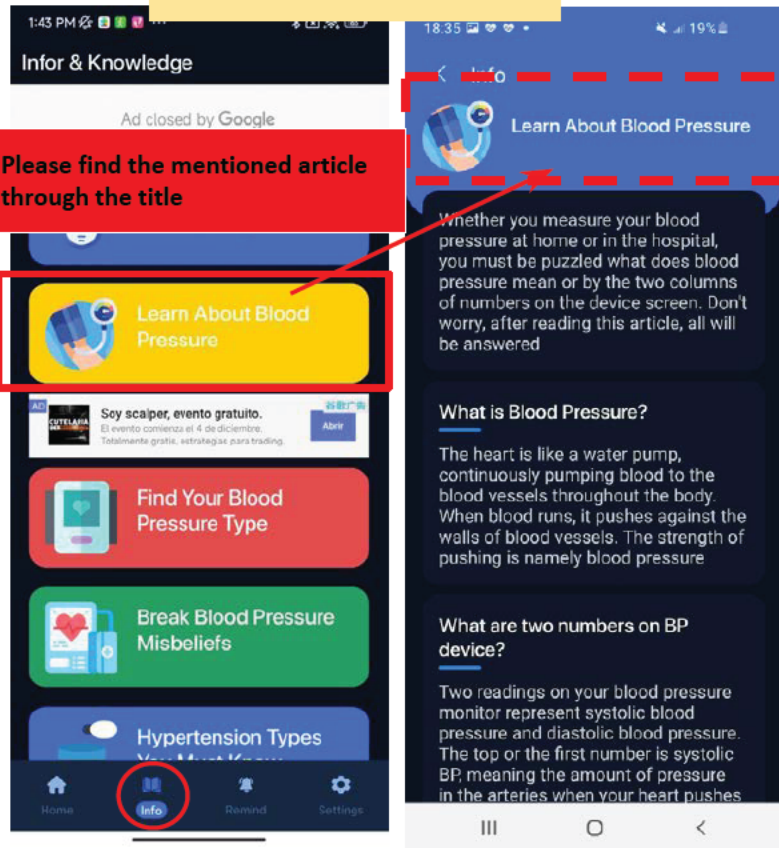
➤ To Find the Mentioned Articles

Cases 2:23-cv-06102 Document 1-6 Filed 01/06/23 Page 5 of 20 Page ID #:59

Our Copyrighted Work



Infringement



Article 1

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articles deliberately without any changes

Our Copyrighted Work

Learn About Blood Pressure



Whether you measure your blood pressure at home or in the hospital, you must be puzzled what does blood pressure mean or by the two columns of numbers on the device screen. Don't worry, after reading this article, all will be answered.

What is blood pressure?

The heart is like a water pump, continuously pumping blood to the blood vessels throughout the body. When blood runs, it pushes against the walls of blood vessels. The strength of pushing is namely blood pressure.

What are two numbers on the BP device?

Two readings on your blood pressure monitor represent systolic blood pressure and diastolic blood pressure. The top or the first number is systolic BP, meaning the amount of pressure in the arteries when your heart pushes blood through arteries. The bottom or the second number is the diastolic one, referring to the pressure in arteries when your heart is between beats.

Infringement

18:35 19%

< Info



Learn About Blood Pressure

Whether you measure your blood pressure at home or in the hospital, you must be puzzled what does blood pressure mean or by the two columns of numbers on the device screen. Don't worry, after reading this article, all will be answered

What is Blood Pressure?

The heart is like a water pump, continuously pumping blood to the blood vessels throughout the body. When blood runs, it pushes against the walls of blood vessels. The strength of pushing is namely blood pressure

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Slide to see the complete text

Proof of Originality**Original Article****Learn About Blood Pressure**

Whether you measure your blood pressure at home or in the hospital, you must be puzzled what does blood pressure mean or by the two columns of numbers on the device screen. Don't worry, after reading this article, all will be answered.

<h1> What is blood pressure?

The heart is like a water pump, continuously pumping blood to the blood vessels throughout the body. When blood runs, it pushes against the walls of blood vessels. The strength of pushing is namely blood pressure.

<h1>What are two numbers on the BP device?

Two readings on your blood pressure monitor represent systolic blood pressure and diastolic blood pressure. The top or the first number is systolic BP, meaning the amount of pressure in the arteries when your heart pushes blood through arteries. The bottom or the second number is the diastolic one, referring to the pressure in arteries when your heart is between beats.

Reference

In the most basic terms, when your heart beats, it pumps blood throughout your body, supplying it with the oxygen and energy it needs. As your blood moves, it pushes against the sides of your blood vessels. The strength of this pushing is what is known as blood pressure.

Normal blood pressure is vital to life. Without the pressure that forces our blood to flow around the circulatory system, no oxygen or nutrients would be delivered through our arteries to the tissues and organs.

When you get your blood pressure numbers, there are two of them. The first, or "top" one, is your systolic blood pressure. The second, or "bottom," one is diastolic blood pressure. Knowing both is important and could save your life.

The top number refers to the amount of pressure in your arteries during the contraction of your heart muscle. This is called systolic pressure.

The bottom number refers to your blood pressure when your heart muscle is between beats. This is called diastolic pressure.

Reference Website

<https://www.matherhospital.org/wellness-at-mather/diseases-conditions/cardiology-101-what-does-blood-pressure-really-mean/>

<https://www.medicalnewstoday.com/articles/270644>

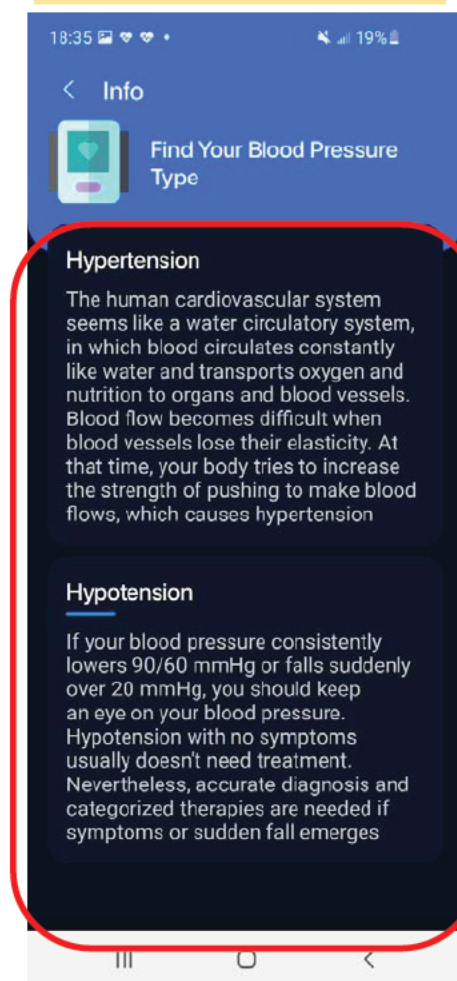
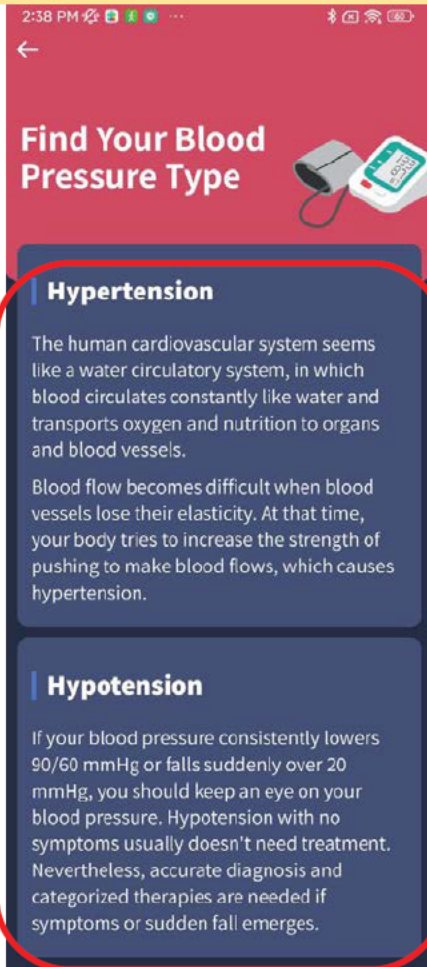
<https://www.webmd.com/hypertension-high-blood-pressure/guide/diastolic-and-systolic-blood-pressure-know-your-numbers#1>

<https://www.healthline.com/health/high-blood-pressure-hypertension/blood-pressure-reading-explained>

Above is the editing process of our original articles:

Our team created all the articles by ourselves with the detailed reference information as shown right

100% plagiarized copyrighted in-app
articles deliberately without any changes



Original Article

Find Your Blood Pressure Type	Reference	Reference Website
<h3>Hypertension</h3> <p>The human cardiovascular system seems like a water circulatory system, in which blood circulates constantly like water and transports oxygen and nutrition to organs and blood vessels.</p> <p>Blood flow becomes difficult when blood vessels lose their elasticity. At that time, your body tries to increase the strength of pushing to make blood flows, which causes hypertension.</p> <h3>Hypotension</h3> <p>If your blood pressure consistently lowers 90/60 mmHg or falls suddenly over 20 mmHg, you should keep an eye on your blood pressure. Hypotension with no symptoms usually doesn't need treatment. Nevertheless, accurate diagnosis and categorized therapies are needed if symptoms or sudden fall emerges.</p>	<p>Low blood pressure is a reading of less than 90/60mmHg. It does not always cause symptoms, but you may need treatment if it does.</p> <p>Blood pressure is the amount of force exerted on the artery walls by the pumping blood. High blood pressure (hypertension) means that your blood is pumping with more force than normal through your arteries.</p>	<p>https://www.nhs.uk/conditions/low-blood-pressure-hypotension/</p> <p>https://www.betterhealth.vic.gov.au/health/conditionsandtreatments/blood-pressure-high-hypertension</p>

Above is the editing process of our original articles:

Our team created all the articles by ourselves with the detailed reference information as shown right

Our Copyrighted Work**Break Blood Pressure Misbeliefs**

You may hear all kinds of myths about blood pressure. Believing in these myths can really make your blood pressure control vain or even make your situation worse. Below are 7 common misunderstands concerning blood pressure. Check out the following and stop believing them.

1. No worries if I have the low blood pressure

Generally speaking, if you have hypotension, some small lifestyle changes can solve the problem. However, if you experience a sudden fall of over 20 mmHg or feel fainting, fatigue, blurred vision, etc., you are in need of professional treatment. If not treated immediately, the hypotension can be life-threatening.

2. I don't have hypertension

Slide to see the complete text

Infringement**Info****Break Blood Pressure Misbeliefs**

You may hear all kinds of myths about blood pressure. Believing in these myths can really make your blood pressure control vain or even make your situation worse. Below are 7 common misunderstands concerning blood pressure. Check out the following and stop believing them.

1. No worries if I have the low blood pressure

Generally speaking, if you have hypotension, some small lifestyle changes can solve the problem. However, if you experience a sudden fall of over 20mmHg or feel fainting, fatigue, blurred vision, etc., you are in need of professional treatment immediately, the hypotension can be life threatening.

2. I don't have hypertension if no symptoms emerge

Do you know that hypertension is

Slide to see the complete text

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Proof of Originality**Original Article**

Break Blood Pressure Misbeliefs	Reference	Reference Website
<p>You may hear all kinds of myths about blood pressure. Believing in these myths can really make your blood pressure control vain or even make your situation worse. Below are 7 common misunderstands concerning blood pressure. Check out the following and stop believing them.</p>	<p>Low blood pressure isn't anything to worry about.</p> <p>Fact: Low blood pressure, or hypotension, can be a concern if it causes symptoms, such as dizziness, fainting, or even shock. Dizziness or fainting could lead to a serious fall. Shock, if not treated immediately, could end in death. However, it's true that low blood pressure is actually normal for some people.</p>	<p>https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure</p>
<p><h1>1. No worries if I have the low blood pressure</p> <p>Generally speaking, if you have hypotension, some small lifestyle changes can solve the problem. However, if you experience a sudden fall of over 20 mmHg or feel fainting, fatigue, blurred vision, etc., you are in need of professional treatment. If not treated immediately, the hypotension can be life-threatening.</p>	<p>A sudden fall in blood pressure can be dangerous. A change of just 20 mm Hg — a drop from 110 systolic to 90 mm Hg systolic, for example — can cause dizziness and fainting when the brain fails to receive enough blood. And big drops, such as those caused by uncontrolled bleeding, severe infections or allergic reactions, can be life-threatening.</p>	<p>https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-2035546#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous.</p>
<p><h1>2. I don't have hypertension if no symptoms emerge</p> <p>Do you know that hypertension is called the "silent killer"? It often runs silent and may have no symptoms, or the symptoms may be mild, which will not be taken seriously while it is causing great damage to your health.</p>	<p>High blood pressure often runs silent and deep, stealthily building and cloaking its symptoms. As it continues along its insidious path, it can affect organ function and lead to serious and deadly consequences.</p>	<p>https://www.franciscanhealth.org/community/blog/hypertension-high-blood-pressure-a-silent-killer</p>
<p>When the symptoms appear, it indicates that the heart, brain, kidney, blood vessel or other organs have been severely damaged and cannot maintain normal functions. At that time, the optimal treatment opportunity has been</p>	<p>Fact: High blood pressure doesn't have symptoms. In fact, nearly one-third of U.S. adults with high blood pressure don't even know they have it. A simple blood pressure measurement can find those affected, yet still undiagnosed</p>	<p>https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure</p>

Above is the editing process of our original articles:

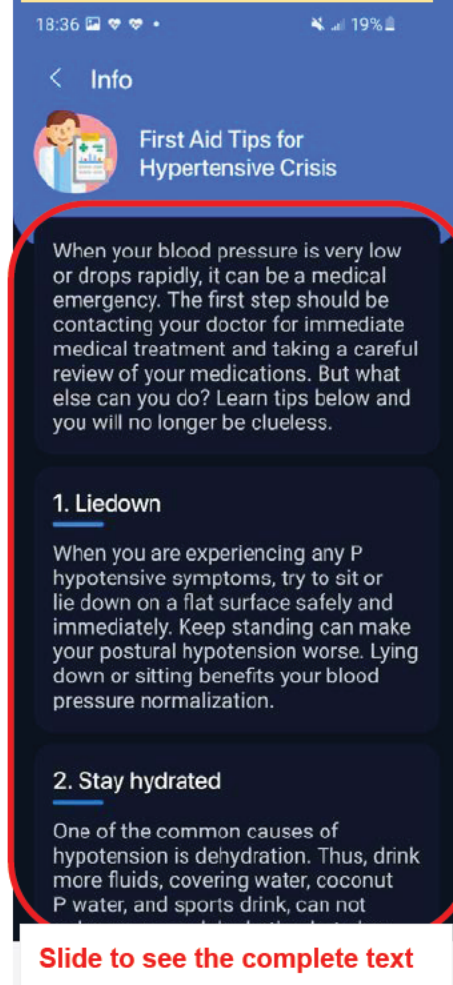
Our team created all the articles by ourselves with the detailed reference information as shown right

Article 4

Our Copyrighted Work



Infringement



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Proof of Originality**Original Article**

First Aid Tips for Hypotensive Crisis		
	Reference	Reference Website
<p>When your blood pressure is very low or drops rapidly, it can be a medical emergency. The first step should be contacting your doctor for immediate medical treatment and taking a careful review of your medications. But what else can you do? Learn tips below and you will no longer be clueless.</p>	<p>If you feel faint, you should immediately sit or lie down if you can do so safely.</p>	
<p><h1>1. Liedown</p> <p>When you are experiencing any hypotensive symptoms, try to sit or lie down on a flat surface safely and immediately. Keeping standing can make your postural hypotension worse. Lying down or sitting benefits your blood pressure normalization.</p>	<p>The moment you experience the giddiness, dizziness, black out or any other symptom of low blood pressure, lie down on a flat surface. Close your eyes for a few minutes or until you feel your pressure normalise.</p>	<p>https://www.bupa.co.uk/health-information/heart-blood-circulation/low-blood-pressure-hypotension</p>
<p><h1>2. Stay hydrated</p> <p>One of the common causes of hypotension is dehydration. Thus, drinking more fluids, covering water, coconut water, and sports drink, can not only ease your dehydration but also helps maintain the fluids in your body. Besides, you can add a small amount of salt or sugar to improve your blood pressure or restore your glucose level.</p>	<p>Drink at least 2 to 3 litres of water every day. Besides this, include drinks like coconut water, bael ka sharbat and aam panna in your low blood pressure diet. These will give you the necessary electrolytes required to maintain the fluids in your body. Dehydration is a common cause of low blood pressure. Pomegranate juice is rich in antioxidants called polyphenols and may help you lower your blood pressure. One of the best ways to fight dehydration is water; so, do not forget to load up on enough water for the day.</p>	<p>https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/</p>
<p><h1>3. Take adequate salt</p> <p>Try eating more salty foods or licking a pinch of salt to let the sodium raise your blood pressure. You can also drink sports drinks or take oral rehydration salts (ORS) which can rehydrate you and provide salt as well as other electrolytes to improve your blood</p>	<p>You can even add a pinch of salt and sugar to the water. Sodium in the salt improves your blood pressure while sugar helps in restoring the glucose level (if caused due to low blood glucose or hypoglycaemia).</p> <p>Generally, the higher your sodium intake, the higher your blood pressure. Long-term, this can put an extra burden on your heart and blood vessels, so you should consult your doctor before adding too much sodium to your diet, as it may increase the chances of other cardiovascular conditions.</p> <p>Oral rehydration salts or ORS not only rehydrates the body but also supplies salt and other electrolytes, which helps in</p>	<p>https://food.ndtv.com/health/home-remedies-for-low-blood-pressure-1287697</p> <p>https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/</p>

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18:38

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First Aid Tips for Hypertensive Crisis

There may be cases where blood pressure shoots up unexpectedly (systolic blood pressure reaching 180 and/or diastolic one reaching 120 mmHg) and emergency care is required. After calling for immediate medical service or during your waiting for the ambulance, what can be the first aid? No worries, we have prepared all the know-how for you.

1. Calm yourself down benefits blood pressure lowering

One thing all hypertension patients need to keep in mind is that lower stress means lower blood pressure. Researchers have found that relaxing fully for a few minutes can decrease systolic blood pressure by 10 mmHg or more. Thus, it is the most natural way to lower your blood pressure during hypertensive urgency. Below are some

Slide to see the complete text

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Info

First Aid Tips for Hypertensive Crisis

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- Stop your current task
- Take deep breaths
- Sit down or lie flat

Slide to see the complete text

Original Article

First Aid Tips for Hypertensive Crisis

There may be cases where blood pressure shoots up unexpectedly (systolic blood pressure reaching 180 and/or diastolic one reaching 120 mmHg) and emergency care is required. After calling for immediate medical service or during your waiting for the ambulance, what can be the first aid? No worries, we have prepared all the know-how for you.

One thing all hypertension patients need to keep in mind is that lower stress means lower blood pressure. [Researchers have found that relaxing fully for a few minutes can decrease systolic blood pressure by 10 mmHg or more.](#) Thus, it is the most natural way to lower your blood pressure during hypertensive urgency. Below are some relaxation tips you can try:

- [Stop your current task](#)
- [Take deep breaths](#)
- [Sit down or lie flat](#)
- Listen to relaxing sounds
- Meditate

If you are a hypertension patient, you [must have blood pressure medicines that the doctor has prescribed for you.](#) Medication is the main option for treating high blood pressure. Therefore, if you or your family members experience a hypertensive emergency, never forget to take medical treatment as soon as possible.

Reference

"If you have high blood pressure (hypertension), without any complications, [the first thing to do is to calm down and lie flat.](#) Leave aside the task you were engaged in and slowly start taking deep breaths. This stress-relieving technique helps to bring down the blood pressure to a certain extent. Additionally, do not forget to take your antihypertensive medications for blood pressure that is uncontrolled by lifestyle changes and diet."

For some people, medication — in addition to lifestyle changes — is necessary to get blood pressure to a healthy level. Even so, stress management can be a helpful addition. In fact, a randomized, controlled trial of older adults showed that an [eight-week program of relaxation response plus other stress management techniques](#) lessened the amount of medication [some of the participants needed to control their blood pressure.](#) Fully relaxing your body and your mind for a few minutes a day could [lower your systolic blood pressure \(the top number of a blood pressure reading\) by 10 points or more](#)—at no cost, and with no side effects."

"If you have temporary high blood pressure from exercise, stress or excitement, you can lower your blood pressure fast by returning your body to a calm state. Since stress can also trigger unhealthy habits, such as overeating or poor sleep, which contribute to high blood pressure, [reducing stress can help lower high blood pressure naturally.](#)"

[Take your blood pressure medication if your doctor has prescribed something for you.](#)

Reference Website

https://www.medicinenet.com/how_to_lower_my_blood_pressure_immediately/article.htm

<https://www.health.harvard.edu/mind-and-mood/lower-stress-lower-your-blood-pressure>

<https://piedmonthealth.org/relax-your-way-to-lower-blood-pressure/#:~:text=Fully%20relaxing%20your%20body%20and,and%20with%20no%20side%20effects.>

<https://www.healthgrades.com/right-care/high-blood-pressure/how-can-you-lower-high-blood-pressure-immediately>

<https://www.adityabirlacapital.com/healthinsuranc/active-together/2020/06/24/lower-blood-pressure-in-emergency/>

<https://www.adityabirlacapital.com/healthinsuranc/active-together/2020/06/24/lower-blood-pressure-in-emergency/>

<https://www.thedailymeal.com/healthy-eating/best-tea-lower-blood-pressure>

<https://www.webmd.com/heart/news/20081110/hibiscus-tea-may-cut-blood-pressure>

<https://www.livestrong.com/article/464240-chamomile-tea-and-blood-pressure/>

<https://www.webmd.com/hypertension-high-blood-pressure/news/20070703/dark-chocolate-may-help-blood-pressure>

<https://pumpingmarvellous.org/dark-chocolate>

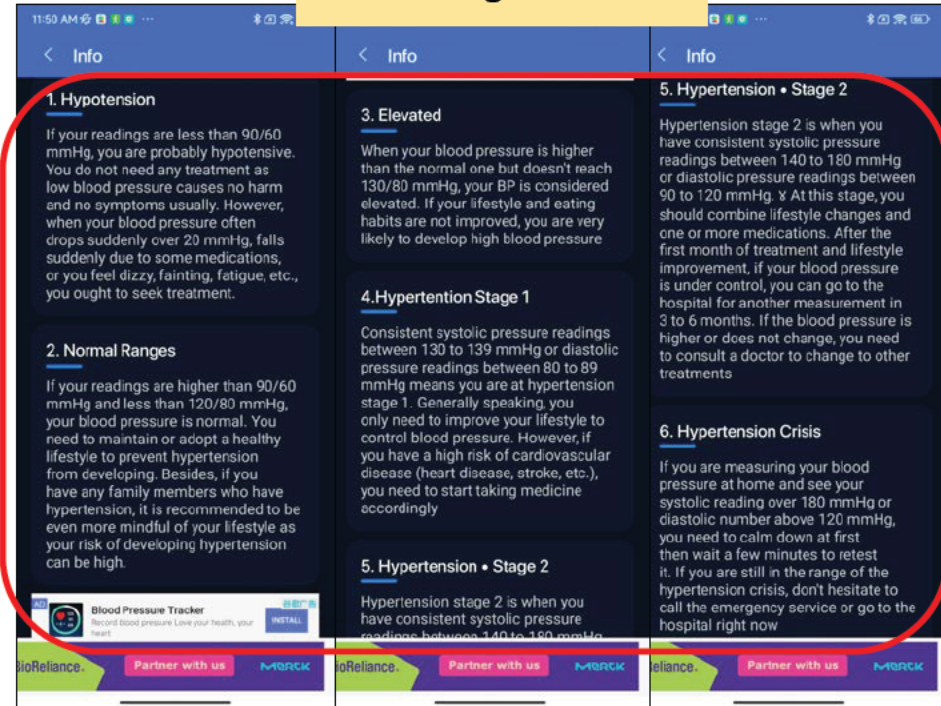
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Our Copyrighted Work



Infringement



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Proof of Originality**Original Article**

Am I at a normal BP range?	Reference	Reference Website
<p>What range can be determined as hypertension? If one of your readings reaches the standard for high blood pressure, but the other one does not, how to determine that? To define your blood pressure numbers, you can see the blood pressure category below.</p> <p><h1>1. Hypotension</p> <p>If your readings are less than 90/60 mmHg, you are probably hypotensive. You do not need any treatment as low blood pressure causes no harm and no symptoms usually. However, when your blood pressure often drops suddenly over 20 mmHg, falls suddenly due to some medications, or you feel dizzy, fainting, fatigue, etc., you ought to seek treatment.</p> <p><h1>2. Normal Ranges</p> <p>If your readings are higher than 90/60 mmHg and less than 120/80 mmHg, your blood pressure is normal. You need to maintain or adopt a healthy lifestyle to prevent hypertension from developing.</p> <p>Besides, if you have any family members who have hypertension, it is recommended to be even more mindful of your lifestyle as your risk of developing hypertension can be high.</p> <p><h1>3. Elevated</p> <p>When your blood pressure is higher than the normal one but doesn't reach 130/80 mmHg, your BP is considered elevated. If your lifestyle and eating habits are not improved, you are very likely to develop high blood pressure.</p>	<p>When you get your blood pressure numbers, there are two of them. The first, or "top" one, is your systolic blood pressure. The second, or "bottom," one is diastolic blood pressure. Knowing both is important and could save your life.</p> <p>The top number refers to the amount of pressure in your arteries during the contraction of your heart muscle. This is called systolic pressure.</p> <p>The bottom number refers to your blood pressure when your heart muscle is between beats. This is called diastolic pressure.</p> <p>A sudden fall in blood pressure can be dangerous. A change of just 20 mm Hg — a drop from 110 systolic to 90 mm Hg systolic, for example — can cause dizziness and fainting when the brain fails to receive enough blood. And big drops, such as those caused by uncontrolled bleeding, severe infections or allergic reactions, can be life-threatening.</p> <p>Low blood pressure is a reading of less than 90/60mmHg. It does not always cause symptoms, but you may need treatment if it does.</p> <p>Elevated blood pressure means that your blood pressure is slightly above what is considered normal. Some doctors refer to slightly elevated blood pressure as prehypertension. Elevated blood pressure will likely turn into high blood pressure (hypertension) unless you make lifestyle changes, such as getting more exercise and eating healthier foods.</p> <p>Anyone can have elevated blood pressure, even children, especially if they're overweight or obese.</p>	<p>https://www.webmd.com/hypertension-high-blood-pressure/guide/diastolic-and-systolic-blood-pressure</p> <p>https://www.healthline.com/health/high-blood-pressure-hypertension/blood-pressure-ranges</p> <p>https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-20355465#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous,</p> <p>https://www.nhs.uk/conditions/low-blood-pressure-hypotension/</p> <p>https://www.mayoclinic.org/diseases-conditions/prehypertension/symptoms-causes/syc-20376703</p>

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App Release Date

Our Copyright Work

About

Category: Health & Fitness

Initial Release Date: Nov 17, 2021

Worldwide Release Date: Nov 17, 2021

Last Updated Time: Nov 27, 2022

Version: 1.4.4

Size: 7.86 mb

Content Rating: Rated for 3+

Requirement: 5.0

Contains Ads: Yes

Package name: bloodpressure.bloodpressureapp.bloodpressuretracker

Infringement

About

Category: Health & Fitness

Initial Release Date: Sep 26, 2022

Worldwide Release Date: Oct 2, 2022

Last Updated Time: Nov 27, 2022

Version: 2022.11.24

Company HQ: Vietnam

Content Rating: Rated for 3+

Contains Ads: Yes

Package name: com.bloodpressure.tracker.app.bpmonitor.bptracker



Our Copyright Work

More Evidence Can be Provided If Needed

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

Please check to confirm

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Please check to confirm

I understand that a copy of the notice may be sent to the developer of the affected content.

Please check to confirm

Signature

Ada Lee

EXHIBIT G

Shelley Ivan

From: BEGAMOB <phuongntb@begamob.com>
Sent: Wednesday, March 22, 2023 8:51 PM
To: deepthought7.5m@gmail.com; Shelley Ivan
Subject: Truthly Apology from Begamob for copyright infringement mistake

Dear Akrura PTE. LTD and Shelley Ivan (Ms.) from Rimon, P.C, represent Akrura PTE. LTD,

Hope this email finds you well and that you had a wonderful day.

My name is Candace Nguyen. I take responsibility for Business Development at Begamob Global PTE. LTD.

I am writing this letter to discuss the Report Plagiarism of Copyrighted In App Articles without your company's authorization on Google Play, specifically here is *Heart Rate Monitor - Pulse App*. And there is an allegedly infringing app from Begamob's side: *Blood Pressure: Heart Rate* - Package name: com.bloodpressure.heartrate.bloodtracker.heartmonitor

I would like to represent my company to convey sincere apologies to your company for any mistakenly attributed copyright infringement which may have been associated with our mobile application on Google Play. We understand the importance of adhering to copyright laws and take full responsibility for it. We deeply regret any inconvenience or damage this may have caused to your organization.

While our application design was unique, we inadvertently included components derived from your content with regard to certain features in-app. We have identified and removed the plagiarized content from our app immediately after receiving the report from your team. In order to ensure that this issue will not recur in the future, we have taken the following proactive steps:

- We have implemented a thorough review process to ensure that all content used in our app is original and properly attributed.
- We have created an internal review of all app updates that must go through prior to their release. This process involves verifying that all code is in compliance with copyright and licensing laws.
- Our development team has been educated on best practices for avoiding copyright and licensing violations.

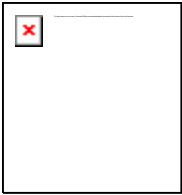
We value our relationship with your organization. Also, we hope that these steps taken demonstrate our commitment to maintaining a good relationship with your company and to protecting its hard-earned reputation.

We understand that the report has been filed with Google Play, and we would like to discuss other options to resolve this matter amicably. We would like to request your help in removing the report from Google Play. We hope that we can work together to find a mutually beneficial solution to this issue.

Again, we deeply apologize for any worries that this incident may cause you.

Thank you for your understanding and cooperation.

Sincerely,
Candace Nguyen



Candace Nguyen (MS.) | Business Development Executive

Phone: +84 394 000 881

Email: phuongntb@ikameglobal.com

LinkedIn: [Candace Nguyen](#)

Website: begamob.com

Headquarters: 36 Hoang Cau st., Dong Da dist., Hanoi, Viet Nam

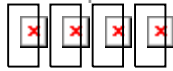


EXHIBIT H

From: [Shelley Ivan](#)
To: trustedapp.help@gmail.com; haudt@apero.vn; admin@apero.vn
Cc: [Zheng \(Jen\) Liu](#); [Jenny Houston](#)
Subject: Akrura v. Apero et al., Case No. 23-cv-000102
Date: Monday, August 14, 2023 2:40:34 PM
Attachments: [2023.08.14 Mtn for Default Entry by Clerk - FILING VERSION.pdf](#)
[2023.08.14 Decl of Shelley Ivan ISO Mtn for Default Entry by Clerk - FILING VERSION.pdf](#)

Dear Apero Representative,

Pursuant to the Court's alternative service order (Dkt. No. 24), attached please find Plaintiff's Motion for Entry of Default by the Clerk Pursuant to Rule 55(a) of the Federal Rules of Civil procedure and supporting Declaration of Shelley Ivan. These papers are being filed with the Court today. Thank you.

Best regards,

Shelley Ivan

Shelley Ivan | Partner

RIMÔN PC

+1 332.600.4332 | shelley.ivan@rimonlaw.com

100 Park Avenue 16th Floor, New York, NY 10017

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6 Email: mark.lee@rimonlaw.com

7 Zheng Liu, Esq. (SBN: 229311)
8 RIMON, P.C.
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12 Email: zheng.liu@rimonlaw.com

13 Shelley Ivan, Esq.
14 RIMON, P.C.
15 100 Park Avenue 16th
16 New York, NY 10017
17 Telephone: 332.600.4332
18 Email: shelly.ivan@rimonlaw.com

19 *Attorneys for Plaintiff* AKRURA PTE. LTD.

20
21 **UNITED STATES DISTRICT COURT**
22 **CENTRAL DISTRICT OF CALIFORNIA**

23 AKRURA PTE. LTD., a Singapore
24 company,

25 Plaintiff,

26 v.

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

Defendants.

Case No.: 2:23-cv-000102-JLS-KS

**PLAINTIFF'S MOTION FOR ENTRY
OF DEFAULT BY THE CLERK
PURSUANT TO RULE 55(a) OF THE
FEDERAL RULES OF CIVIL
PROCEDURE**

Dist. Judge: Hon. Josephine L. Staton

Mag. Judge: Hon. Karen L. Stevenson

COMES NOW, Plaintiff Akrura PTE LTD (“Plaintiff”), by and through its attorneys of record, files this motion for entry of default by the Court’s Clerk against Defendants Apero Technologies Group (“Apero”), Begamob Global (“Begamob”), and Trusted Tools & Utilities Apps (“Tools”) (collectively, “Defendants”), pursuant to Rule 55(a) of the Federal Rules of Civil Procedure (“FRCP”).

I. INTRODUCTION

Plaintiff’s motion is meritorious and should be granted. Defendant Apero stole Plaintiff’s copyrighted blood pressure mobile application available on Google Play and started offering an infringing counterfeit on the same platform and targeting the same consumers. After Plaintiff filed with Google a DMCA takedown request to remove the infringing content, Apero started offering substantially the same infringing counterfeits through the other two defendants, Begamob and Tools. Plaintiff filed this case to stop Defendants’ infringing and damaging actions. However, Defendants did not respond to Plaintiff’s Complaint. The Clerk should thus enter default against Defendants pursuant to FRCP 55(a).

II. BACKGROUND

Plaintiff is the creator and copyright owner of the Blood Pressure mobile application and offers it on Google Play through the QR Code Scanner developer account. Compl. ¶ 2.

On November 17, 2021, Plaintiff released Plaintiff’s Blood Pressure application on Google Play and quickly started generating considerable user traffic and resulting advertising income. *Id.* ¶ 19.

On July 24, 2022, to tap into Plaintiff’s user traffic and related income, Apero surreptitiously launched the Blood Pressure Tracker using the same content as Plaintiff’s application and targeting the same customers. *Id.* ¶ 20.

1 After comparing the two mobile applications, Plaintiff determined that the
2 infringing Apero application had copied the language and interface layout of
3 Plaintiff's application. *Id.* ¶ 21.

4 On December 13, 2022, Google removed Apero's application in response to
5 Plaintiff's DMCA takedown request to Google. *Id.* ¶ 30.

6 On December 23, 2022, Google notified Plaintiff that Apero had submitted a
7 counter notification, as described in 17 U.S.C. § 512(g). Google also advised
8 Plaintiff that Google would reinstate Apero's application unless Plaintiff filed a
9 lawsuit or a claim of infringement against Apero with the U.S. Copyright Office
10 Copyright Claims Board in 10 business days from the December 23, 2022 notice.
11 *Id.* ¶ 31.

12 Notably, several weeks after Plaintiff's first DMCA Takedown Request
13 regarding Apero's application, Apero launched infringing Tool and Begamob
14 applications from the other defendants' developer accounts. *Id.* ¶ 33. Plaintiff
15 later performed a side-by-side comparison for those mobile applications and
16 determined that they had largely the same infringing content as Plaintiff's
17 application. *Id.* ¶ 34.

18 On January 6, 2023, Plaintiff filed the Complaint in this case. Dkt. 1.

19 On April 7, 2023, the Court issued an Order Granting Plaintiff's Ex Parte
20 Motion for Alternative Service ("Alternative Service Order"). Dkt. 24.

21 Pursuant to the Alternative Service Order, Plaintiff served all Defendants
22 and filed a Proof of Service on May 18, 2023. Dkt. 25.

23 Defendants did not file an answer or response to the Complaint, which was
24 due on June 8, 2023.

25 **III. POINTS AND AUTHORITY**

26 Pursuant to Rule 55(a), "[w]hen a party against whom a judgment for
27 affirmative relief is sought has failed to plead or otherwise defend, and that failure
28 is shown by affidavit or otherwise, the clerk must enter the party's default." Fed.

1 R. Civ. P. 55(a). Case law confirms that default should be entered when the
2 defendant fails to respond to a complaint. *See Structural Concrete Prods., LC v.*
3 *Clarendon Am. Inc.*, 244 F.R.D. 317, 348 (E.D. Va. 2007) (“Before the plaintiff
4 can move for default, the clerk or the court must enter default.”).

5 Here, Plaintiff served the Complaint on each Defendant pursuant to the
6 Alternative Service Order and filed a Proof of Service. Dkt. 24-25. Despite
7 Plaintiff’s proper service, Defendants failed to answer or otherwise respond to the
8 Complaint. Ivan Decl. ¶¶ 5-7.

9 Accordingly, the Clerk should enter default against all Defendants.

10 **IV. CONCLUSION**

11 For all of the foregoing reasons, Plaintiff respectfully requests that the Clerk
12 enter default against all Defendants.

13 Dated: August 14, 2023

14 RIMON, P.C.

15 By: /s/ Mark S. Lee

16 Mark S. Lee
17 Zheng Liu
18 Shelley Ivan

19 Attorneys for Plaintiff
20 AKRURA PTE. LTD.

1 **CERTIFICATE OF SERVICE**

2 I, Shelley Ivan, hereby certify that on August 14, 2023, a true and correct
3 copy of the foregoing **PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT**
4 **BY THE CLERK PURSUANT TO RULE 55(a) OF THE FEDERAL RULES**
5 **OF CIVIL PROCEDURE** was served upon Defendants, in accordance with the
6 Court’s April 7, 2023 Order Granting Plaintiff’s Ex Parte Motion for Alternative
7 Service (Dkt. No. 24) as follows:

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

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

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

19
20 By: /s/ Shelley Ivan
21 Shelley Ivan
22
23
24
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28

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7 Zheng Liu, Esq. (SBN: 229311)
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12 Email: zheng.liu@rimonlaw.com

13 Shelley Ivan, Esq. (*pro hac vice*)
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16 New York, NY 10017
17 Telephone: 332.600.4332
18 Email: shelly.ivan@rimonlaw.com

19 *Attorneys for Plaintiff* AKRURA PTE. LTD

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

22 AKRURA PTE. LTD, a Singapore
23 company,

24 Plaintiff,

25 vs.

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

Defendants.

Case No.: 2:23-cv-00102-JLS-KS

**DECLARATION OF SHELLEY IVAN
IN SUPPORT OF PLAINTIFF'S
MOTION FOR ENTRY OF
DEFAULT BY THE CLERK
PURSUANT TO RULE 55(a) of the
FEDERAL RULES OF CIVIL
PROCEDURE**

Judge: Hon. Josephine L. Staton

Magistrate Judge: Hon Karen L.
Stevenson

1 I, Shelley Ivan, declare under penalty of perjury that the contents of this
2 Declaration are true and accurate. If called upon, I am competent to testify as to
3 the matters contained herein.
4

5 1. I am an attorney licensed to practice law in the state of New
6 York. I am also admitted to practice *pro hac vice* before this Court. Dkt. 18.

7 2. I am a partner at the law firm of Rimon, P.C., where I practice
8 primarily intellectual property law and commercial litigation.

9 3. I represent Plaintiff Akrura PTE. LTD (“Plaintiff”) against
10 Defendants Apero Technologies Group (“Apero”), Begamob Global (“Begamob”) and Trusted Tools & Utilities Apps (“Tools”) in the above-captioned case for
11 copyright infringement, whereby Defendants improperly copied Plaintiff’s blood
12 pressure mobile application and offered infringing versions on Google Play.
13 Compl., Dkt. 1.
14

15 4. I submit this Declaration in support of Plaintiff’s Motion for
16 Entry of Default by the Clerk Pursuant to Rule 55(a) of the Federal Rules of Civil
17 Procedure.

18 5. On April 7, 2023, the Court issued an Order Granting Plaintiff’s
19 Ex Parte Motion for Alternative Service (“Alternative Service Order”). Dkt. 24.

20 6. Pursuant to the Alternative Service Order, Plaintiff served the
21 Complaint and Summons on all Defendants and filed a Proof of Service on May
22 18, 2023. Dkt. 25.

23 7. Defendants did not file an answer or response to the Complaint,
24 which was due on June 8, 2023. The time to respond to the Complaint has expired.

25 Executed this 14h day of August, 2023, at Santa Barbara, California.

26 /s/ Shelley Ivan

27 Shelley Ivan

1 **CERTIFICATE OF SERVICE**

2 I, Shelley Ivan, hereby certify that on August 14, 2023, a true and correct
3 copy of the foregoing **DECLARATION OF SHELLEY IVAN IN SUPPORT**
4 **OF PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT BY THE CLERK**
5 **PURSUANT TO RULE 55(a) OF THE FEDERAL RULES OF CIVIL**
6 **PROCEDURE** was served upon Defendants, in accordance with the Court’s April
7 7, 2023 Order Granting Plaintiff’s Ex Parte Motion for Alternative (Dkt. No. 24) as
8 follows:

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

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

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

20
21 By: /s/ Shelley Ivan
22 Shelley Ivan
23
24
25
26
27
28

From: [Shelley Ivan](#)
To: info@begamob.com
Cc: [Zheng \(Jen\) Liu](#); [Jenny Houston](#)
Subject: Akrura v. Apero et al., Case No. 23-cv-000102
Date: Monday, August 14, 2023 2:40:53 PM
Attachments: [2023.08.14 Mtn for Default Entry by Clerk - FILING VERSION.pdf](#)
[2023.08.14 Decl of Shelley Ivan ISO Mtn for Default Entry by Clerk - FILING VERSION.pdf](#)

Dear Begamob Representative,

Pursuant to the Court's alternative service order (Dkt. No. 24), attached please find Plaintiff's Motion for Entry of Default by the Clerk Pursuant to Rule 55(a) of the Federal Rules of Civil procedure and supporting Declaration of Shelley Ivan. These papers are being filed with the Court today. Thank you.

Best regards,

Shelley Ivan

Shelley Ivan | Partner

RIMÔN PC

+1 332.600.4332 | shelley.ivan@rimonlaw.com

100 Park Avenue 16th Floor, New York, NY 10017

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1 Mark S. Lee (SBN: 94103)
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3 2029 Century Park East, Suite
4 400N Los Angeles, CA 90067
5 Telephone: 310.561.5776
6 Email: mark.lee@rimonlaw.com

7 Zheng Liu, Esq. (SBN: 229311)
8 RIMON, P.C.
9 800 Oak Grove Avenue, Suite 250
10 Menlo Park, CA 94025
11 Telephone: 650.382.4546
12 Email: zheng.liu@rimonlaw.com

13 Shelley Ivan, Esq.
14 RIMON, P.C.
15 100 Park Avenue 16th
16 New York, NY 10017
17 Telephone: 332.600.4332
18 Email: shelly.ivan@rimonlaw.com

19 *Attorneys for Plaintiff* AKRURA PTE. LTD.

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

22 AKRURA PTE. LTD., a Singapore
23 company,

24 Plaintiff,

25 v.

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

Defendants.

Case No.: 2:23-cv-000102-JLS-KS

**PLAINTIFF'S MOTION FOR ENTRY
OF DEFAULT BY THE CLERK
PURSUANT TO RULE 55(a) OF THE
FEDERAL RULES OF CIVIL
PROCEDURE**

Dist. Judge: Hon. Josephine L. Staton

Mag. Judge: Hon. Karen L. Stevenson

COMES NOW, Plaintiff Akrura PTE LTD (“Plaintiff”), by and through its attorneys of record, files this motion for entry of default by the Court’s Clerk against Defendants Apero Technologies Group (“Apero”), Begamob Global (“Begamob”), and Trusted Tools & Utilities Apps (“Tools”) (collectively, “Defendants”), pursuant to Rule 55(a) of the Federal Rules of Civil Procedure (“FRCP”).

I. INTRODUCTION

Plaintiff’s motion is meritorious and should be granted. Defendant Apero stole Plaintiff’s copyrighted blood pressure mobile application available on Google Play and started offering an infringing counterfeit on the same platform and targeting the same consumers. After Plaintiff filed with Google a DMCA takedown request to remove the infringing content, Apero started offering substantially the same infringing counterfeits through the other two defendants, Begamob and Tools. Plaintiff filed this case to stop Defendants’ infringing and damaging actions. However, Defendants did not respond to Plaintiff’s Complaint. The Clerk should thus enter default against Defendants pursuant to FRCP 55(a).

II. BACKGROUND

Plaintiff is the creator and copyright owner of the Blood Pressure mobile application and offers it on Google Play through the QR Code Scanner developer account. Compl. ¶ 2.

On November 17, 2021, Plaintiff released Plaintiff’s Blood Pressure application on Google Play and quickly started generating considerable user traffic and resulting advertising income. *Id.* ¶ 19.

On July 24, 2022, to tap into Plaintiff’s user traffic and related income, Apero surreptitiously launched the Blood Pressure Tracker using the same content as Plaintiff’s application and targeting the same customers. *Id.* ¶ 20.

1 After comparing the two mobile applications, Plaintiff determined that the
2 infringing Apero application had copied the language and interface layout of
3 Plaintiff's application. *Id.* ¶ 21.

4 On December 13, 2022, Google removed Apero's application in response to
5 Plaintiff's DMCA takedown request to Google. *Id.* ¶ 30.

6 On December 23, 2022, Google notified Plaintiff that Apero had submitted a
7 counter notification, as described in 17 U.S.C. § 512(g). Google also advised
8 Plaintiff that Google would reinstate Apero's application unless Plaintiff filed a
9 lawsuit or a claim of infringement against Apero with the U.S. Copyright Office
10 Copyright Claims Board in 10 business days from the December 23, 2022 notice.
11 *Id.* ¶ 31.

12 Notably, several weeks after Plaintiff's first DMCA Takedown Request
13 regarding Apero's application, Apero launched infringing Tool and Begamob
14 applications from the other defendants' developer accounts. *Id.* ¶ 33. Plaintiff
15 later performed a side-by-side comparison for those mobile applications and
16 determined that they had largely the same infringing content as Plaintiff's
17 application. *Id.* ¶ 34.

18 On January 6, 2023, Plaintiff filed the Complaint in this case. Dkt. 1.

19 On April 7, 2023, the Court issued an Order Granting Plaintiff's Ex Parte
20 Motion for Alternative Service ("Alternative Service Order"). Dkt. 24.

21 Pursuant to the Alternative Service Order, Plaintiff served all Defendants
22 and filed a Proof of Service on May 18, 2023. Dkt. 25.

23 Defendants did not file an answer or response to the Complaint, which was
24 due on June 8, 2023.

25 **III. POINTS AND AUTHORITY**

26 Pursuant to Rule 55(a), "[w]hen a party against whom a judgment for
27 affirmative relief is sought has failed to plead or otherwise defend, and that failure
28 is shown by affidavit or otherwise, the clerk must enter the party's default." Fed.

1 R. Civ. P. 55(a). Case law confirms that default should be entered when the
2 defendant fails to respond to a complaint. *See Structural Concrete Prods., LC v.*
3 *Clarendon Am. Inc.*, 244 F.R.D. 317, 348 (E.D. Va. 2007) (“Before the plaintiff
4 can move for default, the clerk or the court must enter default.”).

5 Here, Plaintiff served the Complaint on each Defendant pursuant to the
6 Alternative Service Order and filed a Proof of Service. Dkt. 24-25. Despite
7 Plaintiff’s proper service, Defendants failed to answer or otherwise respond to the
8 Complaint. Ivan Decl. ¶¶ 5-7.

9 Accordingly, the Clerk should enter default against all Defendants.

10 **IV. CONCLUSION**

11 For all of the foregoing reasons, Plaintiff respectfully requests that the Clerk
12 enter default against all Defendants.

13 Dated: August 14, 2023

14 RIMON, P.C.

15 By: /s/ Mark S. Lee

16 Mark S. Lee
17 Zheng Liu
18 Shelley Ivan

19 Attorneys for Plaintiff
20 AKRURA PTE. LTD.

1 **CERTIFICATE OF SERVICE**

2 I, Shelley Ivan, hereby certify that on August 14, 2023, a true and correct
3 copy of the foregoing **PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT**
4 **BY THE CLERK PURSUANT TO RULE 55(a) OF THE FEDERAL RULES**
5 **OF CIVIL PROCEDURE** was served upon Defendants, in accordance with the
6 Court’s April 7, 2023 Order Granting Plaintiff’s Ex Parte Motion for Alternative
7 Service (Dkt. No. 24) as follows:

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

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

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

19
20 By: /s/ Shelley Ivan
21 Shelley Ivan
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1 Mark S. Lee (SBN: 94103)
2 Rimon, P.C.
3 2029 Century Park East, Suite 400N
4 Los Angeles, CA 90067
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13 Shelley Ivan, Esq. (*pro hac vice*)
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16 New York, NY 10017
17 Telephone: 332.600.4332
18 Email: shelly.ivan@rimonlaw.com

19 *Attorneys for Plaintiff* AKRURA PTE. LTD

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

22 AKRURA PTE. LTD, a Singapore
23 company,

24 Plaintiff,

25 vs.

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

Defendants.

Case No.: 2:23-cv-00102-JLS-KS

**DECLARATION OF SHELLEY IVAN
IN SUPPORT OF PLAINTIFF'S
MOTION FOR ENTRY OF
DEFAULT BY THE CLERK
PURSUANT TO RULE 55(a) of the
FEDERAL RULES OF CIVIL
PROCEDURE**

Judge: Hon. Josephine L. Staton

Magistrate Judge: Hon Karen L.
Stevenson

1 I, Shelley Ivan, declare under penalty of perjury that the contents of this
2 Declaration are true and accurate. If called upon, I am competent to testify as to
3 the matters contained herein.
4

5 1. I am an attorney licensed to practice law in the state of New
6 York. I am also admitted to practice *pro hac vice* before this Court. Dkt. 18.

7 2. I am a partner at the law firm of Rimon, P.C., where I practice
8 primarily intellectual property law and commercial litigation.

9 3. I represent Plaintiff Akrura PTE. LTD (“Plaintiff”) against
10 Defendants Apero Technologies Group (“Apero”), Begamob Global (“Begamob”) and Trusted Tools & Utilities Apps (“Tools”) in the above-captioned case for
11 copyright infringement, whereby Defendants improperly copied Plaintiff’s blood
12 pressure mobile application and offered infringing versions on Google Play.
13 Compl., Dkt. 1.
14

15 4. I submit this Declaration in support of Plaintiff’s Motion for
16 Entry of Default by the Clerk Pursuant to Rule 55(a) of the Federal Rules of Civil
17 Procedure.

18 5. On April 7, 2023, the Court issued an Order Granting Plaintiff’s
19 Ex Parte Motion for Alternative Service (“Alternative Service Order”). Dkt. 24.

20 6. Pursuant to the Alternative Service Order, Plaintiff served the
21 Complaint and Summons on all Defendants and filed a Proof of Service on May
22 18, 2023. Dkt. 25.

23 7. Defendants did not file an answer or response to the Complaint,
24 which was due on June 8, 2023. The time to respond to the Complaint has expired.

25 Executed this 14h day of August, 2023, at Santa Barbara, California.

26 /s/ Shelley Ivan

27 Shelley Ivan

I, Shelley Ivan, hereby certify that on August 14, 2023, a true and correct copy of the foregoing **DECLARATION OF SHELLEY IVAN IN SUPPORT OF PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT BY THE CLERK PURSUANT TO RULE 55(a) OF THE FEDERAL RULES OF CIVIL PROCEDURE** was served upon Defendants, in accordance with the Court’s April 7, 2023 Order Granting Plaintiff’s Ex Parte Motion for Alternative (Dkt. No. 24) as follows:

(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

From: [Shelley Ivan](#)
To: liveroyalstudio.inc@gmail.com
Cc: [Zheng \(Jen\) Liu](#); [Jenny Houston](#)
Subject: Akrura v. Apero et al., Case No. 23-cv-000102
Date: Monday, August 14, 2023 2:41:03 PM
Attachments: [2023.08.14 Mtn for Default Entry by Clerk - FILING VERSION.pdf](#)
[2023.08.14 Decl of Shelley Ivan ISO Mtn for Default Entry by Clerk - FILING VERSION.pdf](#)

Dear Trusted Tools & Utilities Representative,

Pursuant to the Court's alternative service order (Dkt. No. 24), attached please find Plaintiff's Motion for Entry of Default by the Clerk Pursuant to Rule 55(a) of the Federal Rules of Civil procedure and supporting Declaration of Shelley Ivan. These papers are being filed with the Court today. Thank you.

Best regards,

Shelley Ivan

Shelley Ivan | Partner

RIMÔN PC

+1 332.600.4332 | shelley.ivan@rimonlaw.com

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3 2029 Century Park East, Suite
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5 Telephone: 310.561.5776
6 Email: mark.lee@rimonlaw.com

7 Zheng Liu, Esq. (SBN: 229311)
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9 800 Oak Grove Avenue, Suite 250
10 Menlo Park, CA 94025
11 Telephone: 650.382.4546
12 Email: zheng.liu@rimonlaw.com

13 Shelley Ivan, Esq.
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16 New York, NY 10017
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18 Email: shelly.ivan@rimonlaw.com

19 *Attorneys for Plaintiff* AKRURA PTE. LTD.

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

22 AKRURA PTE. LTD., a Singapore
23 company,

24 Plaintiff,

25 v.

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

Defendants.

Case No.: 2:23-cv-000102-JLS-KS

**PLAINTIFF'S MOTION FOR ENTRY
OF DEFAULT BY THE CLERK
PURSUANT TO RULE 55(a) OF THE
FEDERAL RULES OF CIVIL
PROCEDURE**

Dist. Judge: Hon. Josephine L. Staton

Mag. Judge: Hon. Karen L. Stevenson

COMES NOW, Plaintiff Akrura PTE LTD (“Plaintiff”), by and through its attorneys of record, files this motion for entry of default by the Court’s Clerk against Defendants Apero Technologies Group (“Apero”), Begamob Global (“Begamob”), and Trusted Tools & Utilities Apps (“Tools”) (collectively, “Defendants”), pursuant to Rule 55(a) of the Federal Rules of Civil Procedure (“FRCP”).

I. INTRODUCTION

Plaintiff’s motion is meritorious and should be granted. Defendant Apero stole Plaintiff’s copyrighted blood pressure mobile application available on Google Play and started offering an infringing counterfeit on the same platform and targeting the same consumers. After Plaintiff filed with Google a DMCA takedown request to remove the infringing content, Apero started offering substantially the same infringing counterfeits through the other two defendants, Begamob and Tools. Plaintiff filed this case to stop Defendants’ infringing and damaging actions. However, Defendants did not respond to Plaintiff’s Complaint. The Clerk should thus enter default against Defendants pursuant to FRCP 55(a).

II. BACKGROUND

Plaintiff is the creator and copyright owner of the Blood Pressure mobile application and offers it on Google Play through the QR Code Scanner developer account. Compl. ¶ 2.

On November 17, 2021, Plaintiff released Plaintiff’s Blood Pressure application on Google Play and quickly started generating considerable user traffic and resulting advertising income. *Id.* ¶ 19.

On July 24, 2022, to tap into Plaintiff’s user traffic and related income, Apero surreptitiously launched the Blood Pressure Tracker using the same content as Plaintiff’s application and targeting the same customers. *Id.* ¶ 20.

1 After comparing the two mobile applications, Plaintiff determined that the
2 infringing Apero application had copied the language and interface layout of
3 Plaintiff's application. *Id.* ¶ 21.

4 On December 13, 2022, Google removed Apero's application in response to
5 Plaintiff's DMCA takedown request to Google. *Id.* ¶ 30.

6 On December 23, 2022, Google notified Plaintiff that Apero had submitted a
7 counter notification, as described in 17 U.S.C. § 512(g). Google also advised
8 Plaintiff that Google would reinstate Apero's application unless Plaintiff filed a
9 lawsuit or a claim of infringement against Apero with the U.S. Copyright Office
10 Copyright Claims Board in 10 business days from the December 23, 2022 notice.
11 *Id.* ¶ 31.

12 Notably, several weeks after Plaintiff's first DMCA Takedown Request
13 regarding Apero's application, Apero launched infringing Tool and Begamob
14 applications from the other defendants' developer accounts. *Id.* ¶ 33. Plaintiff
15 later performed a side-by-side comparison for those mobile applications and
16 determined that they had largely the same infringing content as Plaintiff's
17 application. *Id.* ¶ 34.

18 On January 6, 2023, Plaintiff filed the Complaint in this case. Dkt. 1.

19 On April 7, 2023, the Court issued an Order Granting Plaintiff's Ex Parte
20 Motion for Alternative Service ("Alternative Service Order"). Dkt. 24.

21 Pursuant to the Alternative Service Order, Plaintiff served all Defendants
22 and filed a Proof of Service on May 18, 2023. Dkt. 25.

23 Defendants did not file an answer or response to the Complaint, which was
24 due on June 8, 2023.

25 **III. POINTS AND AUTHORITY**

26 Pursuant to Rule 55(a), "[w]hen a party against whom a judgment for
27 affirmative relief is sought has failed to plead or otherwise defend, and that failure
28 is shown by affidavit or otherwise, the clerk must enter the party's default." Fed.

1 R. Civ. P. 55(a). Case law confirms that default should be entered when the
2 defendant fails to respond to a complaint. *See Structural Concrete Prods., LC v.*
3 *Clarendon Am. Inc.*, 244 F.R.D. 317, 348 (E.D. Va. 2007) (“Before the plaintiff
4 can move for default, the clerk or the court must enter default.”).

5 Here, Plaintiff served the Complaint on each Defendant pursuant to the
6 Alternative Service Order and filed a Proof of Service. Dkt. 24-25. Despite
7 Plaintiff’s proper service, Defendants failed to answer or otherwise respond to the
8 Complaint. Ivan Decl. ¶¶ 5-7.

9 Accordingly, the Clerk should enter default against all Defendants.

10 **IV. CONCLUSION**

11 For all of the foregoing reasons, Plaintiff respectfully requests that the Clerk
12 enter default against all Defendants.

13 Dated: August 14, 2023

14 RIMON, P.C.

15 By: /s/ Mark S. Lee

16 Mark S. Lee
17 Zheng Liu
18 Shelley Ivan

19 Attorneys for Plaintiff
20 AKRURA PTE. LTD.

1 **CERTIFICATE OF SERVICE**

2 I, Shelley Ivan, hereby certify that on August 14, 2023, a true and correct
3 copy of the foregoing **PLAINTIFF’S MOTION FOR ENTRY OF DEFAULT**
4 **BY THE CLERK PURSUANT TO RULE 55(a) OF THE FEDERAL RULES**
5 **OF CIVIL PROCEDURE** was served upon Defendants, in accordance with the
6 Court’s April 7, 2023 Order Granting Plaintiff’s Ex Parte Motion for Alternative
7 Service (Dkt. No. 24) as follows:

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

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

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

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20 By: /s/ Shelley Ivan
21 Shelley Ivan
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1 Mark S. Lee (SBN: 94103)
2 Rimon, P.C.
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9 800 Oak Grove Avenue, Suite 250
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12 Email: zheng.liu@rimonlaw.com

13 Shelley Ivan, Esq. (*pro hac vice*)
14 Rimon, P.C.
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16 New York, NY 10017
17 Telephone: 332.600.4332
18 Email: shelly.ivan@rimonlaw.com

19 *Attorneys for Plaintiff* AKRURA PTE. LTD

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

22 AKRURA PTE. LTD, a Singapore
23 company,

24 Plaintiff,

25 vs.

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

Defendants.

Case No.: 2:23-cv-00102-JLS-KS

**DECLARATION OF SHELLEY IVAN
IN SUPPORT OF PLAINTIFF'S
MOTION FOR ENTRY OF
DEFAULT BY THE CLERK
PURSUANT TO RULE 55(a) of the
FEDERAL RULES OF CIVIL
PROCEDURE**

Judge: Hon. Josephine L. Staton

Magistrate Judge: Hon Karen L.
Stevenson

1 I, Shelley Ivan, declare under penalty of perjury that the contents of this
2 Declaration are true and accurate. If called upon, I am competent to testify as to
3 the matters contained herein.
4

5 1. I am an attorney licensed to practice law in the state of New
6 York. I am also admitted to practice *pro hac vice* before this Court. Dkt. 18.

7 2. I am a partner at the law firm of Rimon, P.C., where I practice
8 primarily intellectual property law and commercial litigation.

9 3. I represent Plaintiff Akrura PTE. LTD (“Plaintiff”) against
10 Defendants Apero Technologies Group (“Apero”), Begamob Global (“Begamob”) and Trusted Tools & Utilities Apps (“Tools”) in the above-captioned case for
11 copyright infringement, whereby Defendants improperly copied Plaintiff’s blood
12 pressure mobile application and offered infringing versions on Google Play.
13 Compl., Dkt. 1.
14

15 4. I submit this Declaration in support of Plaintiff’s Motion for
16 Entry of Default by the Clerk Pursuant to Rule 55(a) of the Federal Rules of Civil
17 Procedure.

18 5. On April 7, 2023, the Court issued an Order Granting Plaintiff’s
19 Ex Parte Motion for Alternative Service (“Alternative Service Order”). Dkt. 24.

20 6. Pursuant to the Alternative Service Order, Plaintiff served the
21 Complaint and Summons on all Defendants and filed a Proof of Service on May
22 18, 2023. Dkt. 25.

23 7. Defendants did not file an answer or response to the Complaint,
24 which was due on June 8, 2023. The time to respond to the Complaint has expired.

25 Executed this 14h day of August, 2023, at Santa Barbara, California.

26 /s/ Shelley Ivan

27 Shelley Ivan

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(1) Defendant Apero Technologies Group – by emailing the Service Papers to trustedapp.help@gmail.com, haudt@apero.vn and 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.

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EXHIBIT I

Shelley Ivan

From: Shelley Ivan
Sent: Tuesday, August 22, 2023 6:54 PM
To: removals@google.com
Cc: deepthought7.5m@gmail.com
Subject: RE: [9-5423000033857] Your Request to Google
Attachments: Akrura Complaint and Exhibits.pdf; Service Emails to Trusted Tools & Utilities App re Summons and Complaint in Akrura v. Apero.pdf

Dear Google Team,

My name is Shelley Ivan and my firm, Rimon, P.C., represents plaintiff Akrura PTE. LTD against three defendants, including Trusted Tools & Utilities App ("Tools") in Akrura v. Apero, et al., Case No. 2:23-cv-000102, that was filed on January 6, 2023 with the United States District Court for the Central District of California. I have attached: (1) a filed copy of the complaint addressing defendant Tools' infringing blood pressure application; and (ii) the service email to defendant Tools, advising them about the commencement of the lawsuit. Because this litigation is still pending, defendant Tools' infringing application should not be reinstated.

Thank you very much for your time and attention to this matter.

Best regards,

Shelley Ivan

----- Forwarded message -----

From: <removals@google.com>
Date: Tue, Aug 22, 2023 at 2:36 PM
Subject: Re: [9-5423000033857] Your Request to Google
To: <deepthought7.5m@gmail.com>

Hello,

Thanks for reaching out to us.

In response to your copyright removal request, we've removed the content in question in all regions. However, the affected user has submitted a counter notice to dispute the removal. To help you understand the counter notice, a text copy is shown below.

We will reinstate the content in question in 10 business days unless you file a legal action seeking a court order to restrain the alleged infringement. Alternatively, you may have access to an out-of-court dispute resolution process. To learn more about your options in the EU, go to <https://support.google.com/european-union-digital-services-act-redress-options>. To learn more about your options in the US, go to <https://support.google.com/legal/answer/4558836>.

If you choose to pursue one of these options, please send us supporting documentation. If we receive your documentation after we have reinstated the alleged infringing content, we will reverse the reinstatement.

=====

Country of residence

Pakistan

Full legal name

Muhammad Abdullah

Your Title

Marketing Manager

Company name

Hazel Mobile

Contact email address

liveroyalstudio.inc@gmail.com

Address

Building 28, Ground Floor, Nishter Block, Sector E

Bahria Town, Lahore, Punjab, Pakistan 54000

Phone number

+923000506659

URL(s) of the content in question

<https://docs.google.com/presentation/d/1qV7x0aOx08BDCPhv1huQrZNOHChBFYA8wS1ARB3yicw/edit?usp=sharing>

Developer

Trusted Tools & Utilities Apps

App name

Blood Pressure App: BP Tracker

Why are you requesting reinstatement?

Select one of the options below.

I never used the content

Please provide more details to justify your request

Our app has been suspended due to an incorrect copyright complaint regarding the string code, in-app text, and app feature design. We want to provide a justification for why we did not infringe on any app.

To assist you in understanding the distinctions between our app and the claimed app, we have created a comprehensive comparison deck. This document visually and descriptively breaks down the key differences in design, features, and functionality, providing a clearer understanding of how our app differs from the claimed app. You can access the comparison deck using the following link:

<https://docs.google.com/presentation/d/1qV7x0aOx08BDCPhv1huQrZNOHChBFYA8wS1ARB3yjcw/edit?usp=sharing>

Our App ID and claimed App ID are provided in the document for clarity.

We request a thorough review of our app and the DMCA claim against it. We firmly believe that Blood Pressure App: BP Tracker fully complies with DMCA policies and regulations. Thus our app should be reinstated.

Thanks & Regards!

I consent to the jurisdiction of Federal District Court for the judicial district in which I reside (or the Northern District of California if my address is outside of the United States), and I will accept service of process from the person who provided notification under subsection (c)(1)(C) or an agent of such person.

Check to confirm

I swear, under penalty of perjury, that I have a good faith belief that the content identified above was removed or disabled as a result of a mistake or misidentification of the material to be removed or disabled.

Check to confirm

Signature

Muhammad Abdullah

<https://play.google.com/store/apps/details?id=bloodpressureapp.bloodpressuremonitor.bloodpressuretrack>

=====

Regards,

The Google Team

For more information about our content removal process, see q.co/legal.

Report alleged copyright infringement

Country of residence

Singapore

Full legal name

Sherry Smith

Full legal name of the copyright holder you represent

QR Code Scanner.

Contact email address

deephought7.5m@gmail.com

Identify and describe the copyrighted work

Above two infringing apps maliciously plagiarised our original copyrighted string code and in-app text, as well as the app feature design. Their intentional plagiarism not only infringes upon our intellectual property rights, but also violates the DMCA and google policies. Thus, we truly hope google could remove these two infringing apps ASAP to reduce the impact and losses it brings. Please contact us with any questions or further information.

Where can we see an authorized example of the work?

<https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker>

Allegedly infringing URLs

<https://play.google.com/store/apps/details?id=com.bloodpressure.tracker.app.bpmonitor.bptracker>

<https://play.google.com/store/apps/details?id=bloodpressureapp.bloodpressuremonitor.bloodpressuretrack>

Attach a screenshot of the allegedly infringing material

Copyright_Infringement_Report_Gegamob_Global_&_Trusted_Tools.pdf

I have a good faith belief that use of the copyrighted materials described above as allegedly infringing is not authorized by the copyright owner, its agent, or the law.

Please check to confirm

The information in this notification is accurate and I swear, under penalty of perjury, that I am the copyright owner or am authorized to act on behalf of the owner of an exclusive right that is allegedly infringed.

Please check to confirm

I understand that a copy of the notice may be sent to the developer of the affected content.

Please check to confirm

Signature

Sherry Smith