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11 Telephone: 650.382.4546  
12 Email: zheng.liu@rimonlaw.com

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14 RIMON, P.C.  
15 100 Park Avenue 16th Floor  
16 New York, NY 10017  
17 Telephone: 332.600.4332  
18 Email: shelley.ivan@rimonlaw.com  
19 *Attorneys for Plaintiff AKRURA PTE. LTD*

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

AKRURA PTE. LTD, a Singapore  
company,

Plaintiff,

vs.

APERO TECHNOLOGIES GROUP, a  
Vietnam company, BEGAMOB  
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

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

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 Rimon, 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 1<sup>st</sup> day of September, 2023, at Santa Barbara, California.

/s/ Shelley Ivan  
Shelley Ivan

**CERTIFICATE OF SERVICE**

I, Shelley Ivan, hereby certify that on September 1, 2023, a true and correct copy of the foregoing **DECLARATION OF SHELLEY IVAN IN SUPPORT OF PLAINTIFF'S RULE 55(b) MOTION DEFAULT JUDGMENT** 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:

(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.

By: /s/ Shelley Ivan  
Shelley Ivan

# EXHIBIT A

**From:** [removals@google.com](mailto:removals@google.com) <[removals@google.com](mailto:removals@google.com)>  
**Sent:** Wednesday, August 17, 2022 2:28 PM  
**To:** David Silver <[david@bayramoglu-legal.com](mailto: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](mailto:Trustedapp.help@gmail.com).

Regards,

The Google Team

For more information about our content removal process access [g.co/legal](https://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](mailto: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+

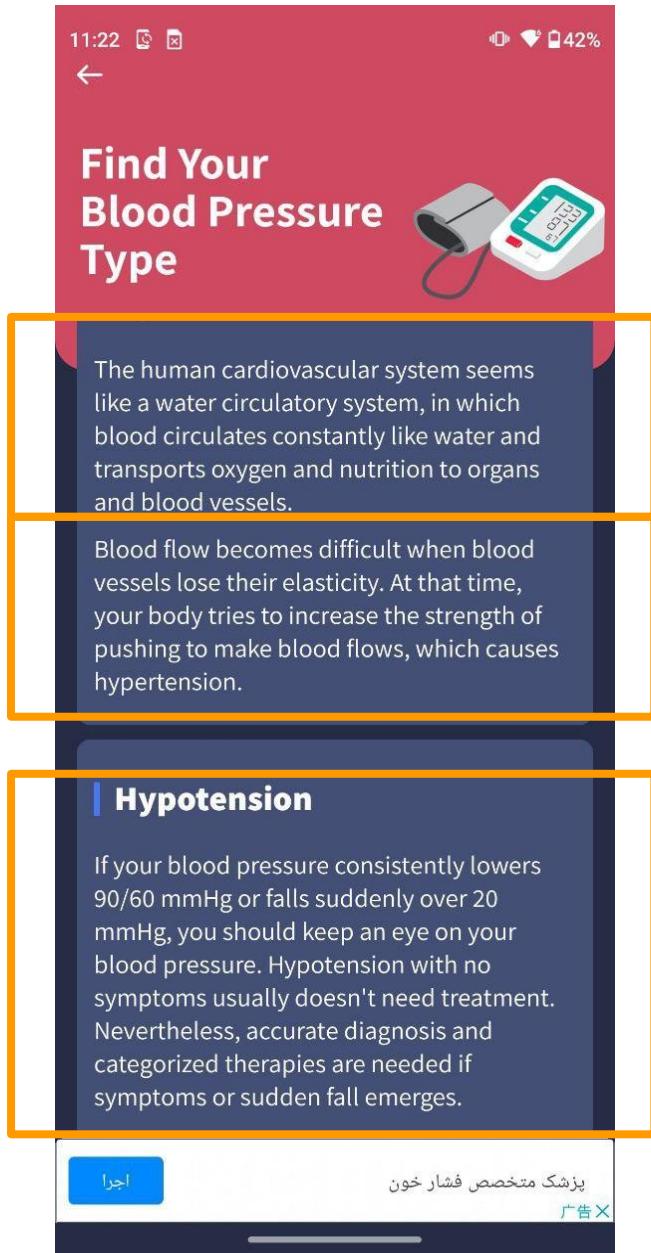
Downloads

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Everyone ⓘ



# 100% Copied our Inapp Text



11:22 42% ←

## Find Your Blood Pressure Type



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.

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.

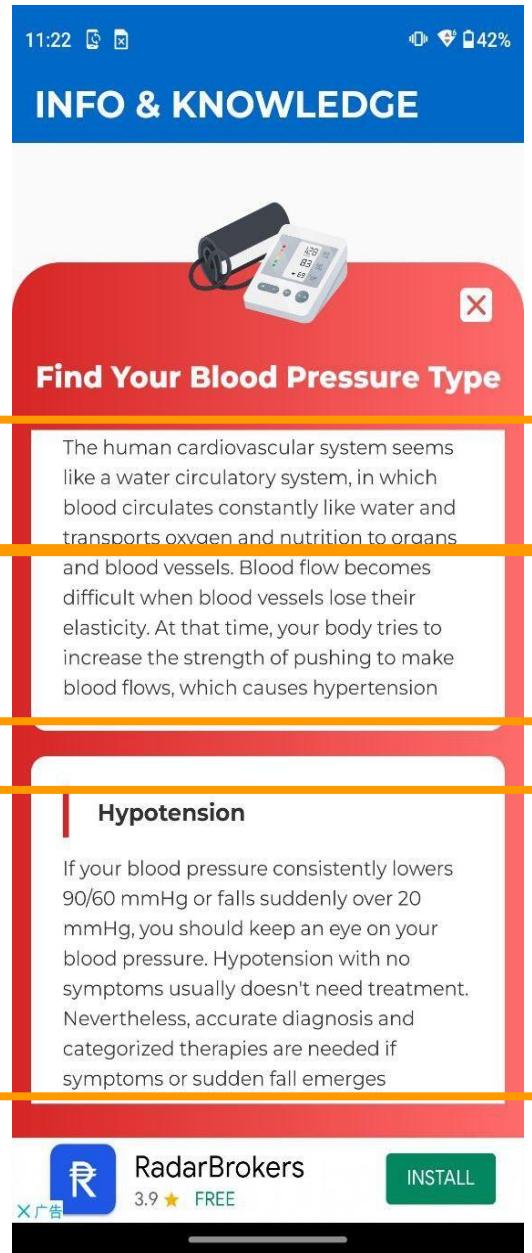
### Hypotension

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.

اجرا پزشک متخصص فشار خون 广告 X

This screenshot shows the 'Find Your Blood Pressure Type' section of the app. It includes a description of the cardiovascular system, a note about hypertension, and a detailed section on hypotension. The hypotension section is highlighted with an orange border. A large orange arrow points from this section to the corresponding section in the allegedly infringing app.

Our Copyrighted App



11:22 42% ←

## INFO & KNOWLEDGE



Find Your Blood Pressure Type

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. 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

### Hypotension

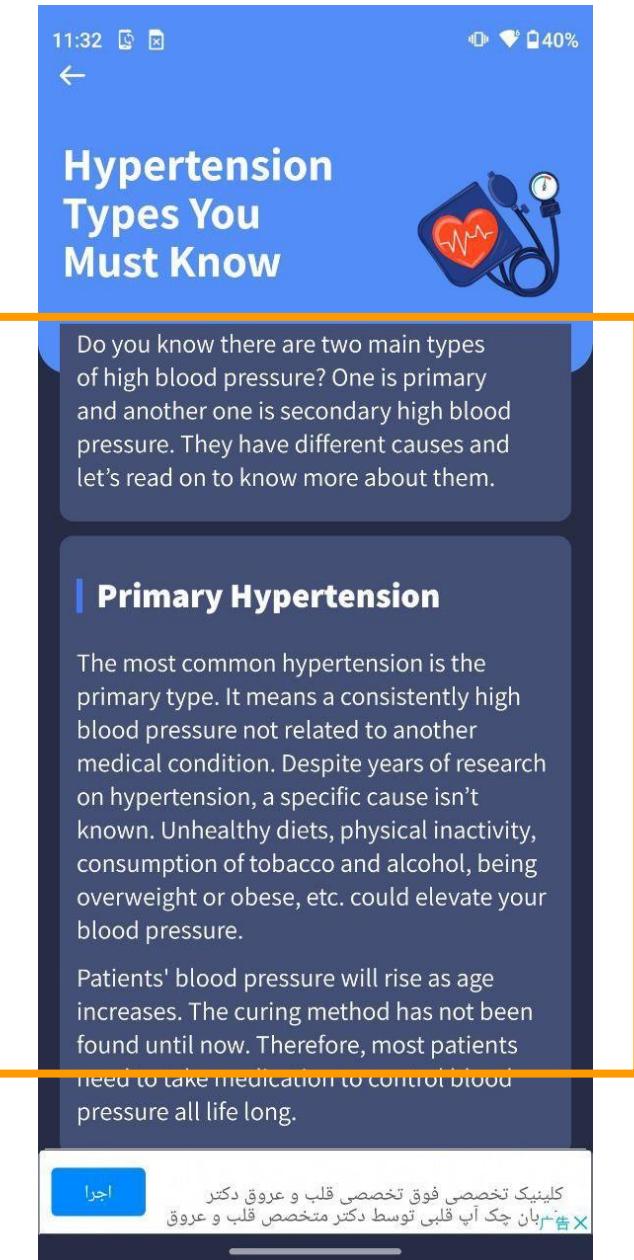
If your blood pressure consistently lowers 90/60 mmHg or falls suddenly over 20 mmHg, you should keep an eye on your blood pressure. Hypotension with no symptoms usually doesn't need treatment. Nevertheless, accurate diagnosis and categorized therapies are needed if symptoms or sudden fall emerges

RadarBrokers 3.9 ★ FREE INSTALL

This screenshot shows the 'Find Your Blood Pressure Type' section of the allegedly infringing app. It contains the same text as the copyrighted app's section, including the detailed hypotension information. The entire hypotension section is highlighted with an orange border, matching the highlighted section in the copyrighted app's screenshot.

Allegedly Infringing App

# 100% Copied our Inapp Text



11:32 40% ←

## Hypertension Types You Must Know



Do you know there are two main types of high blood pressure? One is primary and another one is secondary high blood pressure. They have different causes and let's read on to know more about them.

### Primary Hypertension

The most common hypertension is the primary type. It means a consistently high blood pressure not related to another medical condition. Despite years of research on hypertension, a specific cause isn't known. Unhealthy diets, physical inactivity, consumption of tobacco and alcohol, being overweight or obese, etc. could elevate your blood pressure.

Patients' blood pressure will rise as age increases. The curing method has not been found until now. Therefore, most patients need to take medication to control blood pressure all life long.

اجرا

کلینیک تخصصی فوق تخصصی قلب و عروق دکتر چان چک آپ قلبی تو سط دکتر متخصص قلب و عروق 广告 X

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## INFO & KNOWLEDGE



Hypertension Types You Must Know

Do you know there are two main types of high blood pressure? One is primary and another one is secondary high blood pressure. They have different causes and let's read on to know more about them

### Primary Hypertension

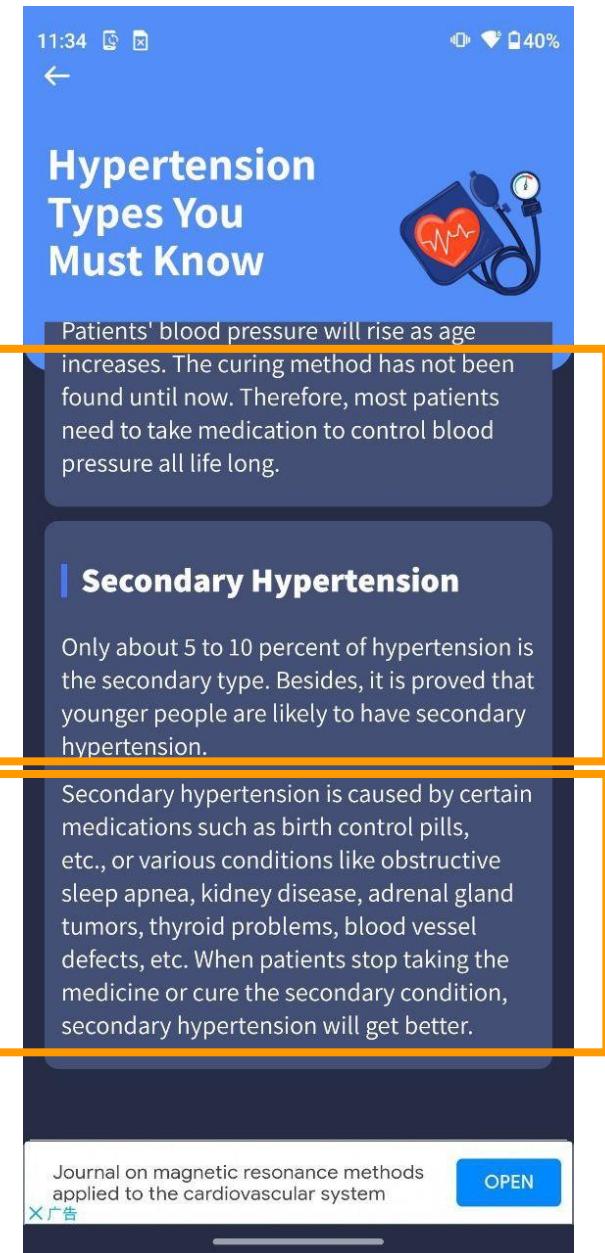
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RadarBrokers Google Play

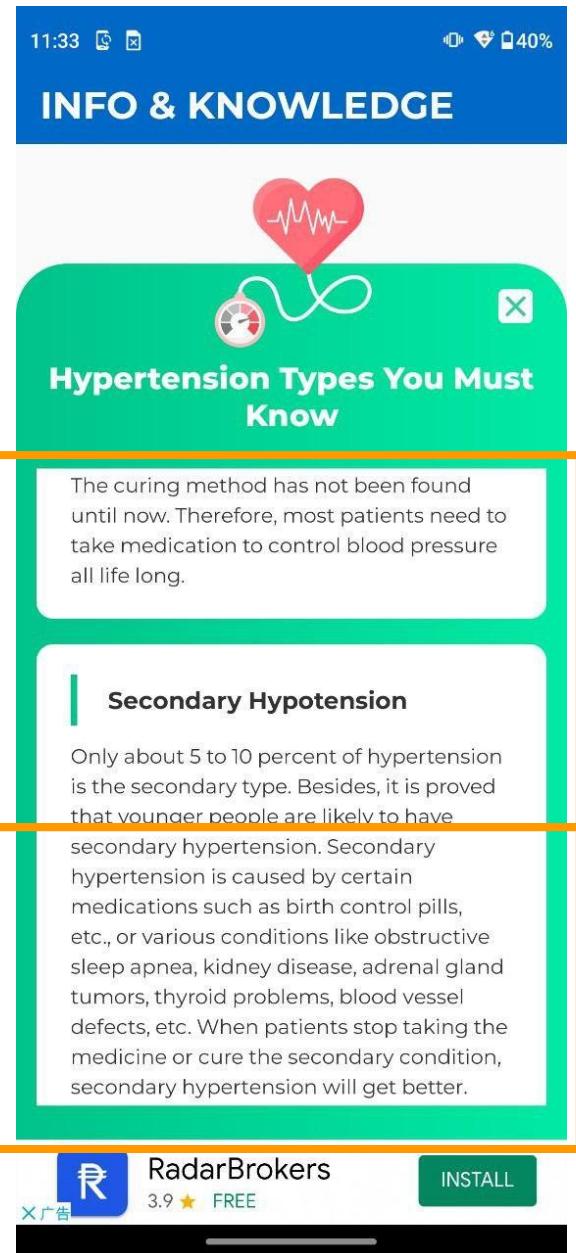
INSTALL

Allegedly Infringing App

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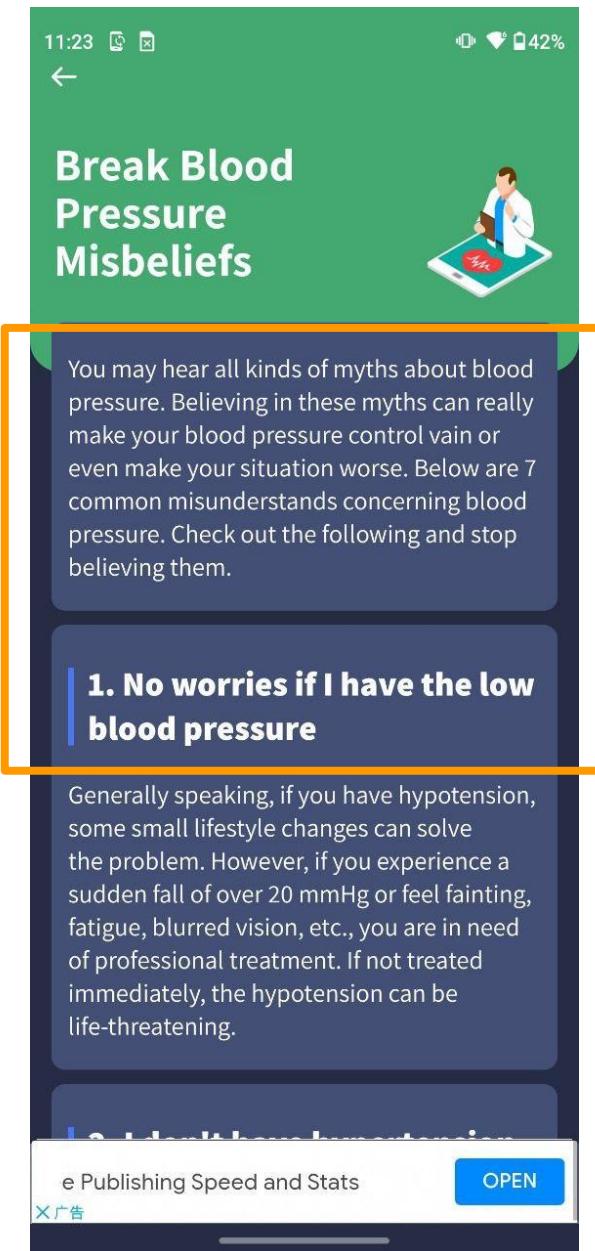


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## Break Blood Pressure Misbeliefs



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.

1 Publishing Speed and Stats  
X广告

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INFO & KNOWLEDGE



## 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**

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

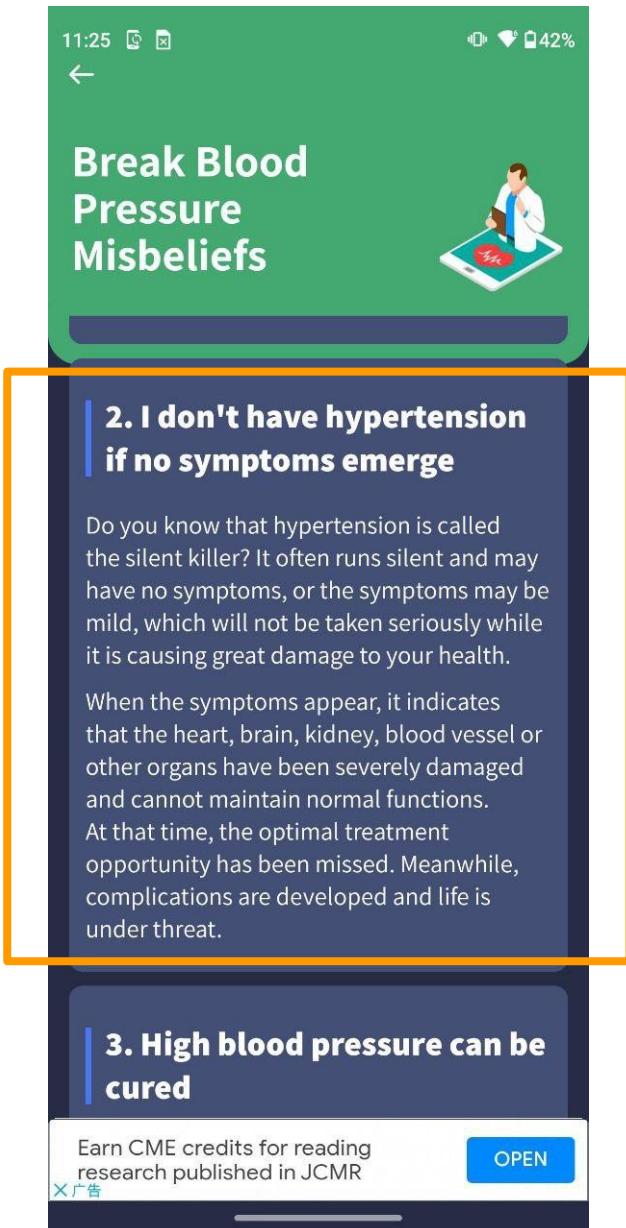
cardiovascularultrasound.biomedcentral.c...  
Cardiovascular Ultrasound  
X广告

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## Break Blood Pressure Misbeliefs



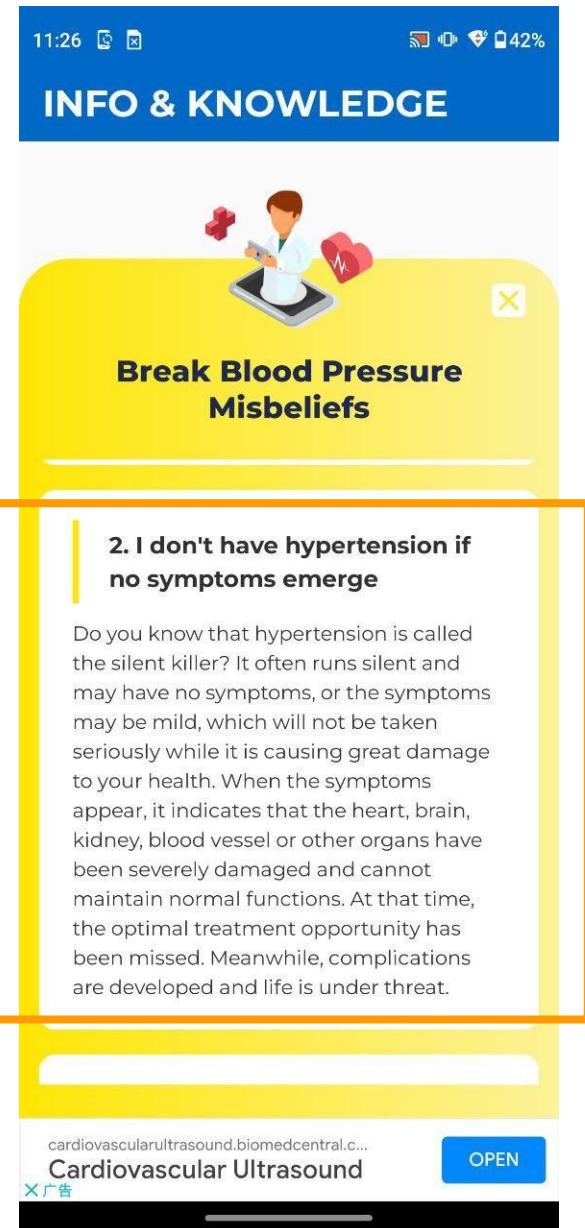
**2. I don't have hypertension if no symptoms emerge**

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. 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 missed. Meanwhile, complications are developed and life is under threat.

**3. High blood pressure can be cured**

Earn CME credits for reading research published in JCMR ×广告

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INFO & KNOWLEDGE



**Break Blood Pressure Misbeliefs**

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

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. 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 missed. Meanwhile, complications are developed and life is under threat.

cardiovascularultrasound.biomedcentral.c... ×广告

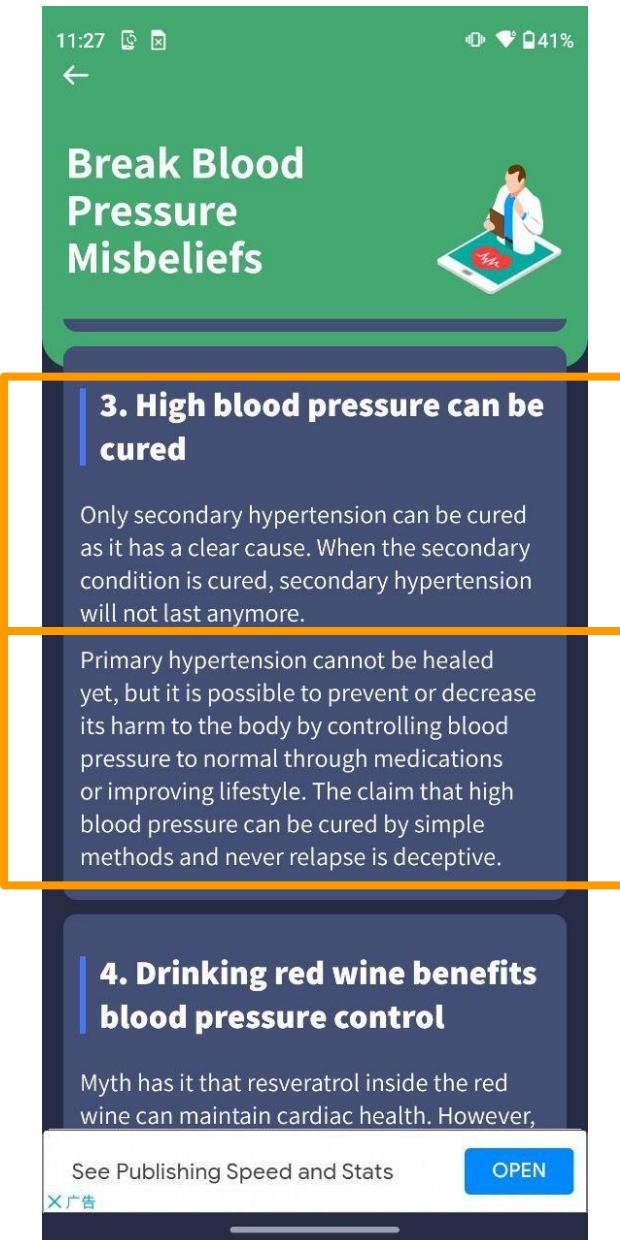
Cardiovascular Ultrasound

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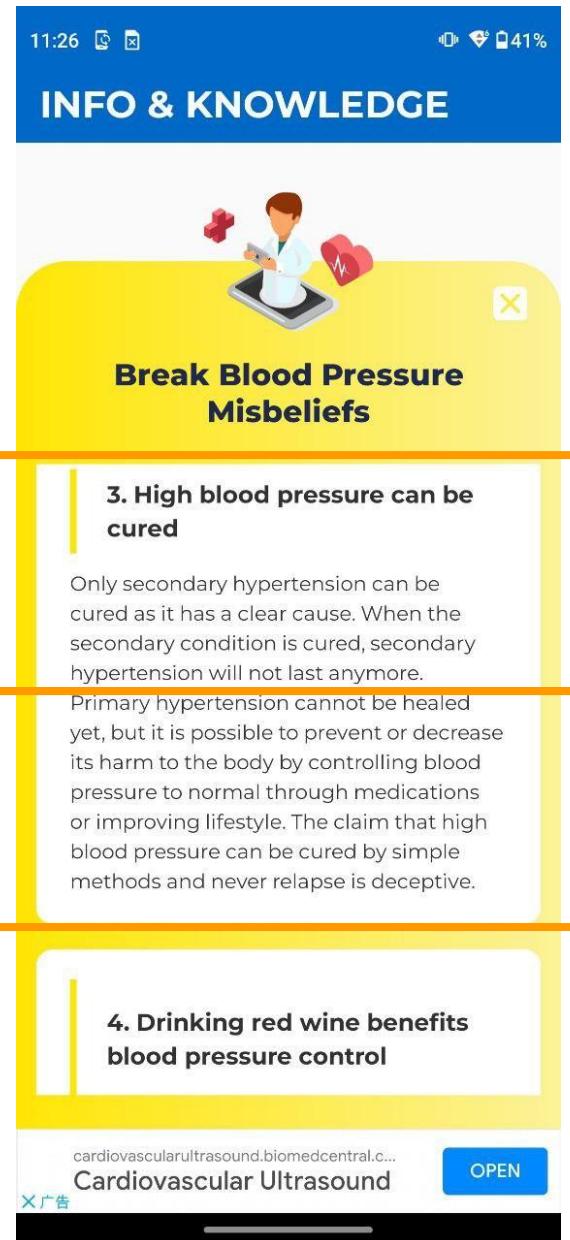
Our Copyrighted App

Allegedly Infringing App

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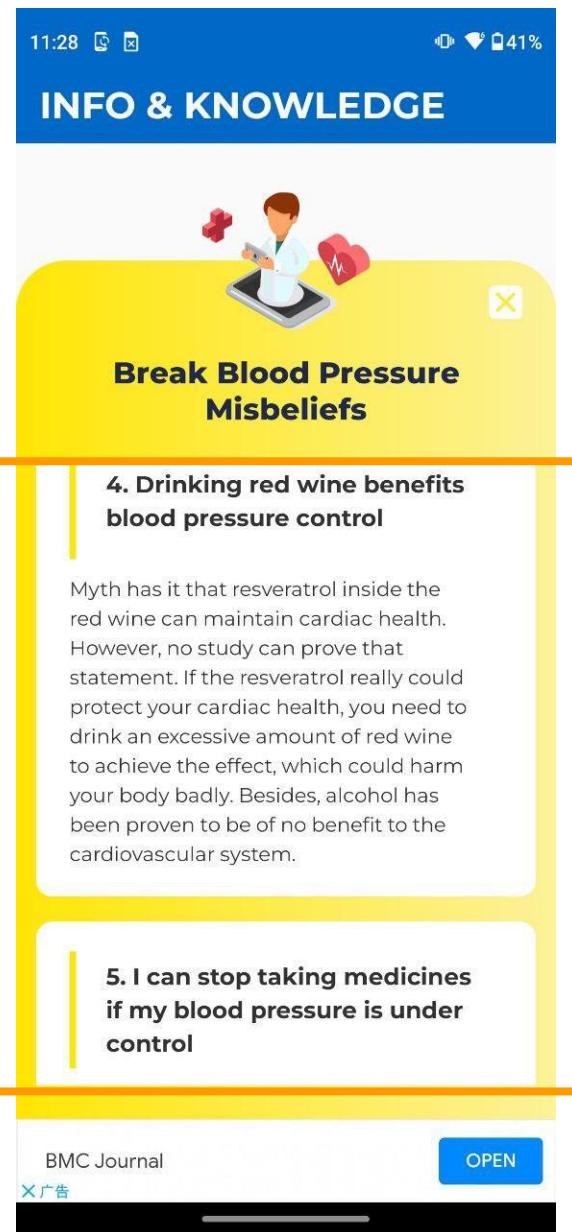
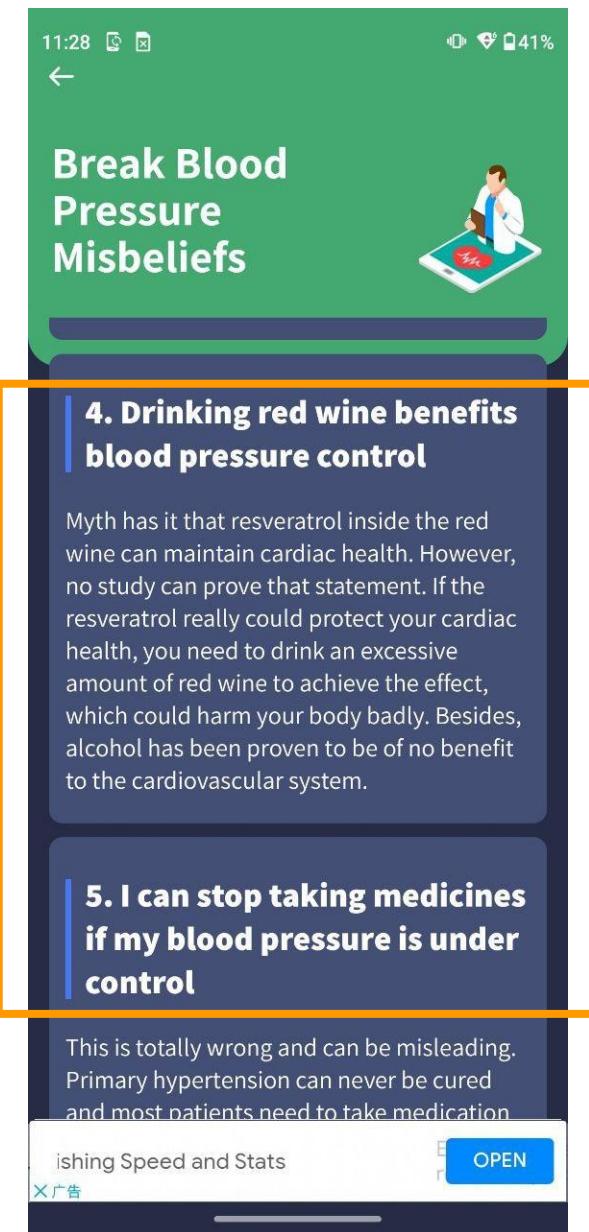


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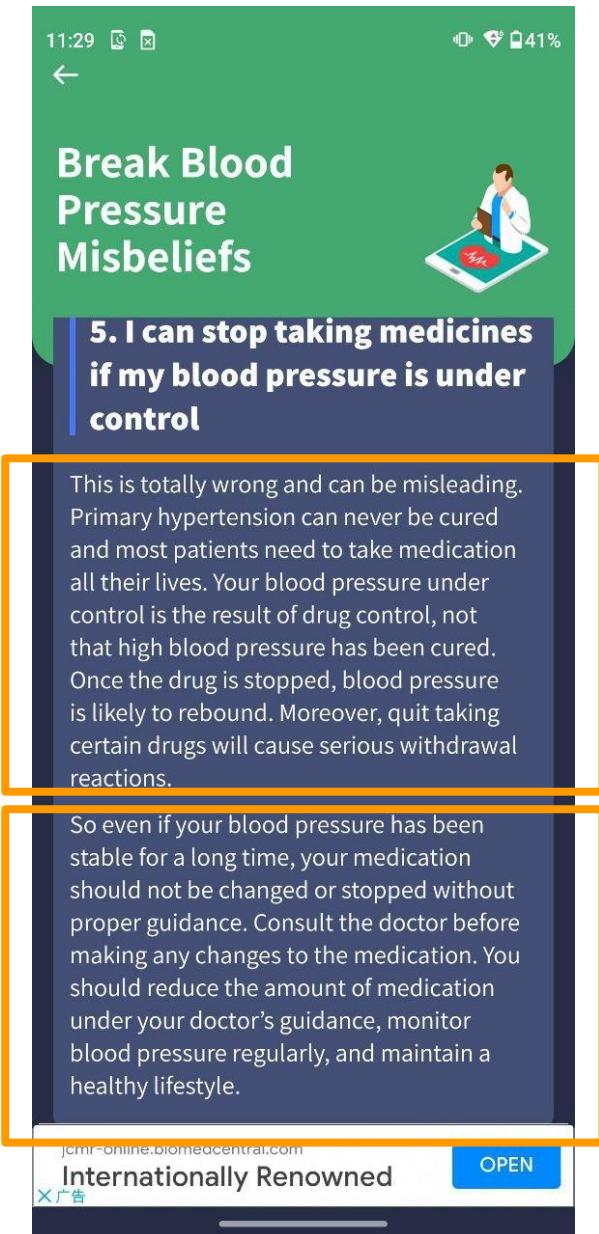
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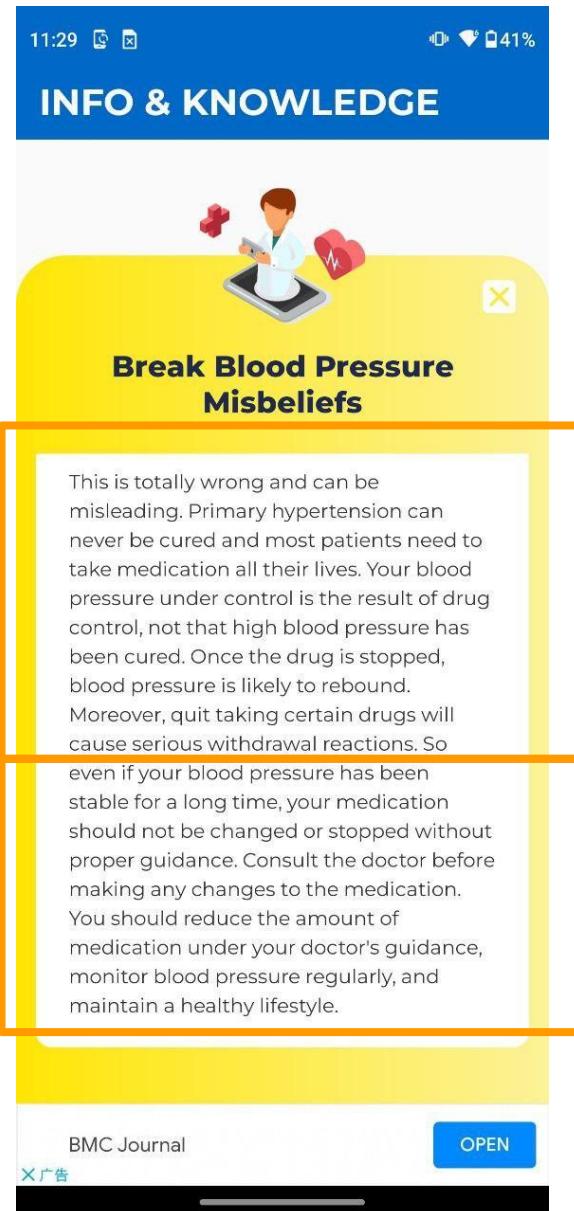
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Break Blood Pressure Misbeliefs

**6. Young people will not get hypertension**

Although patients with hypertension are common among middle-aged and elderly people, young people can also suffer from it. The level of blood pressure is affected by age, body size, level of sexual development, lifestyle, etc.

**7. Only men can develop hypertension**

The risk difference between men and women actually depends on age. Before the age of 45, men are at greater risk of hypertension than women. Between the ages of 45 and 64, they have almost the same risk. It is worth noting that after 64 years old, women's risk of getting high blood pressure is higher than men's.

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INFO & KNOWLEDGE

**Break Blood Pressure Misbeliefs**

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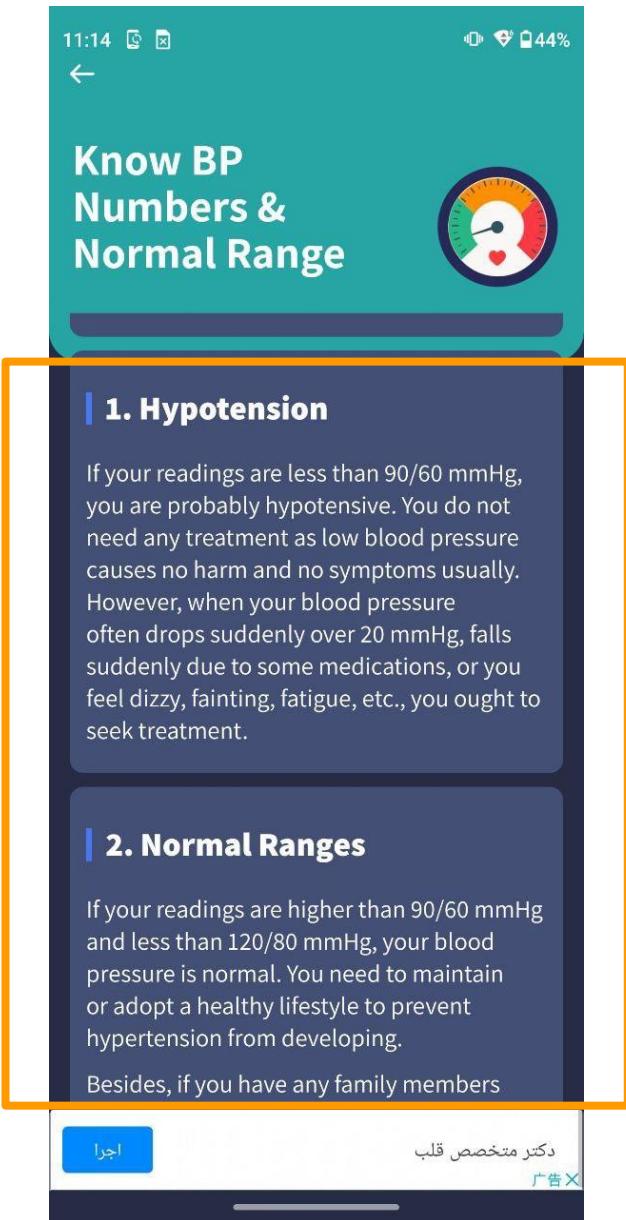
cardiovascularultrasound.biomedcentral.com  
Cardiovascular Ultrasound

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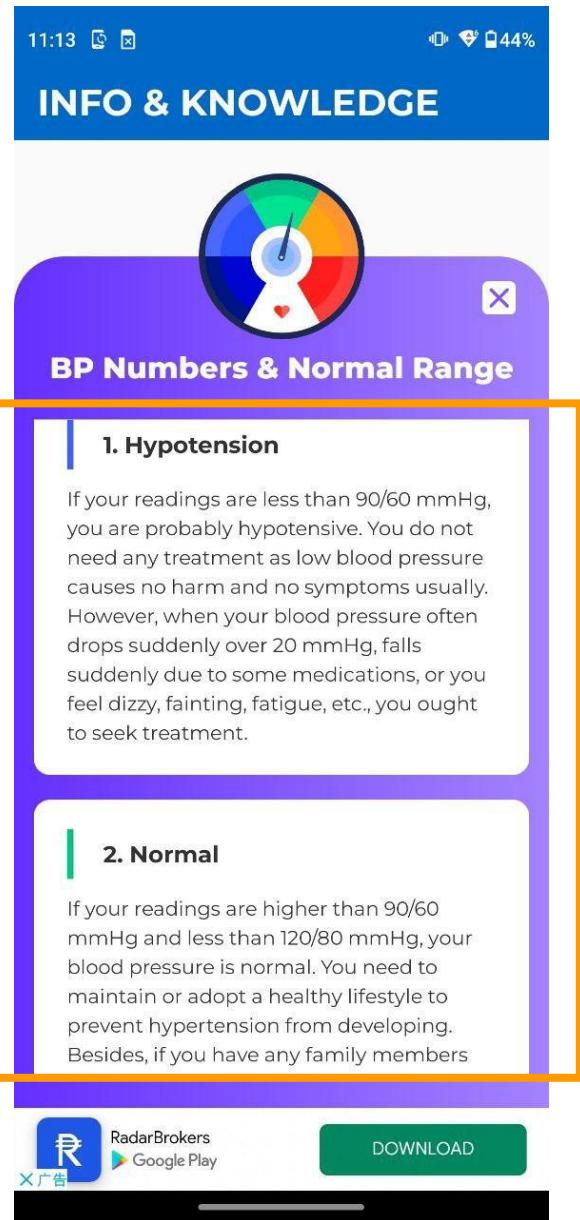
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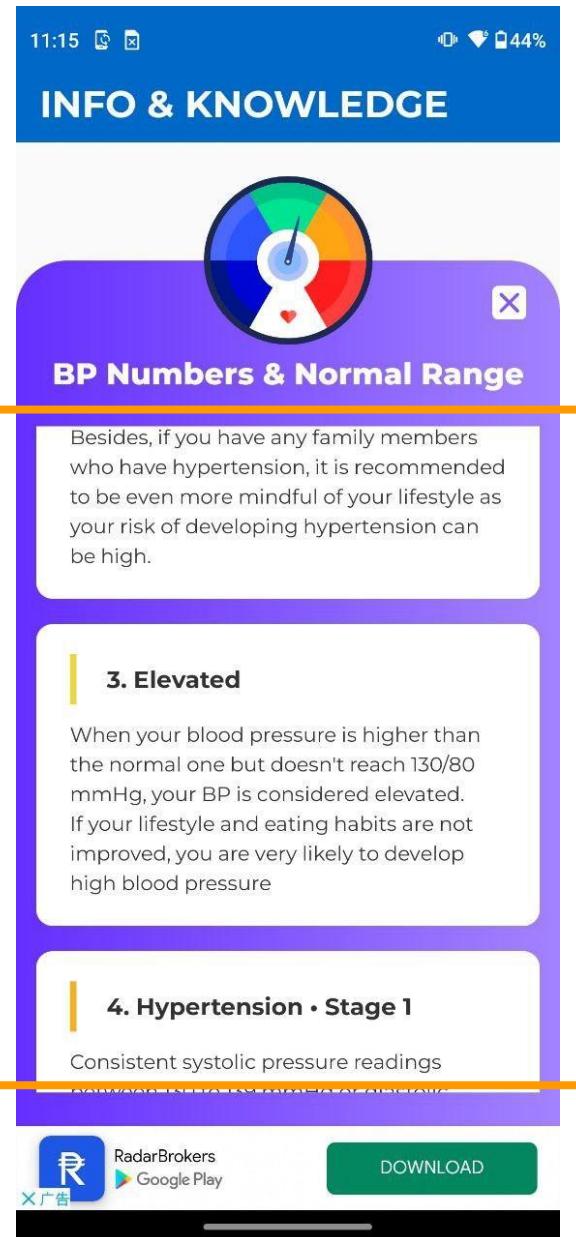
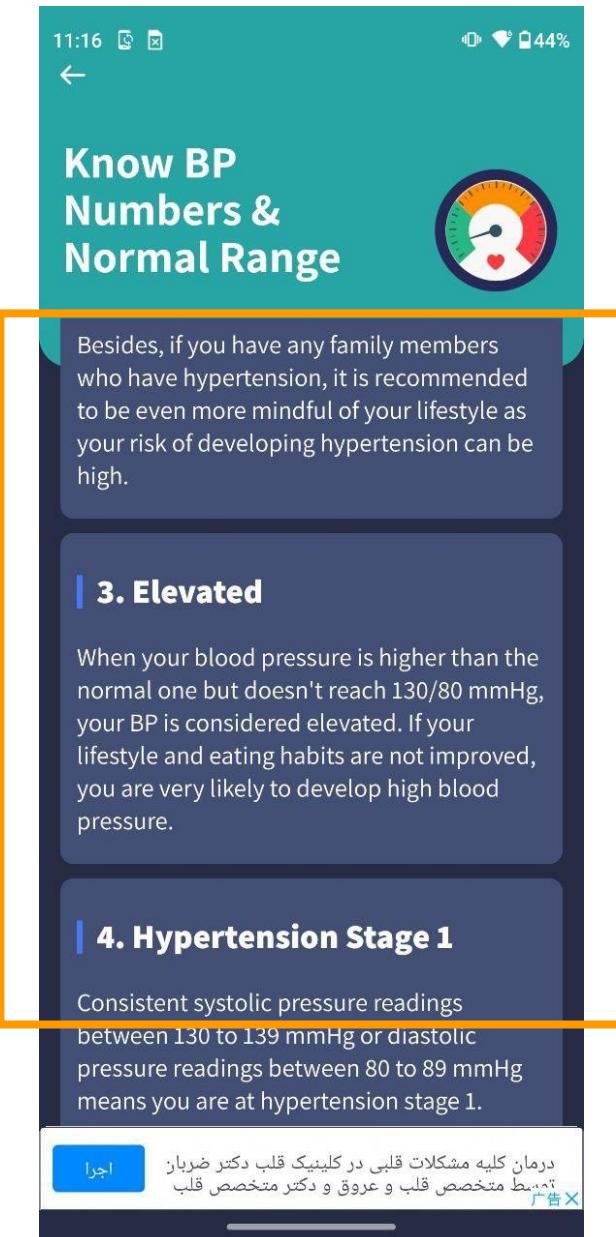


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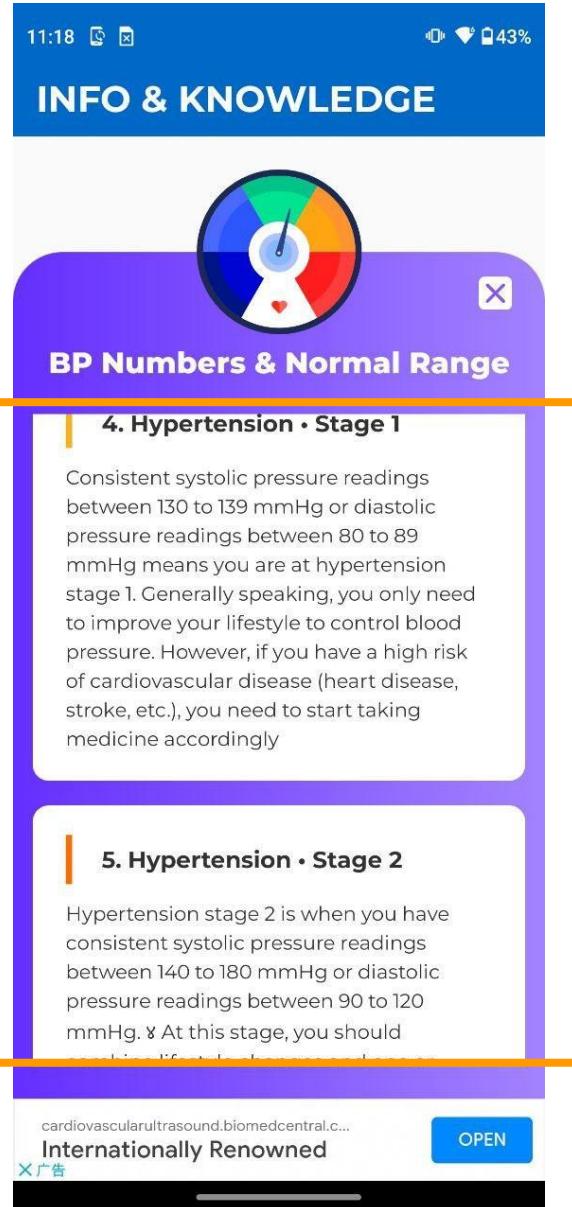
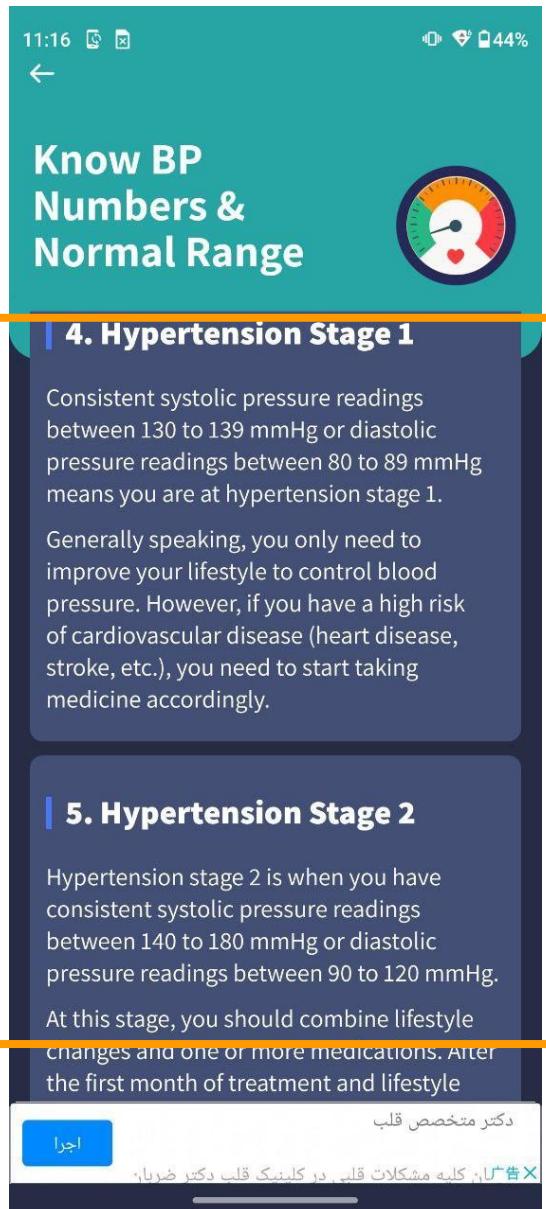
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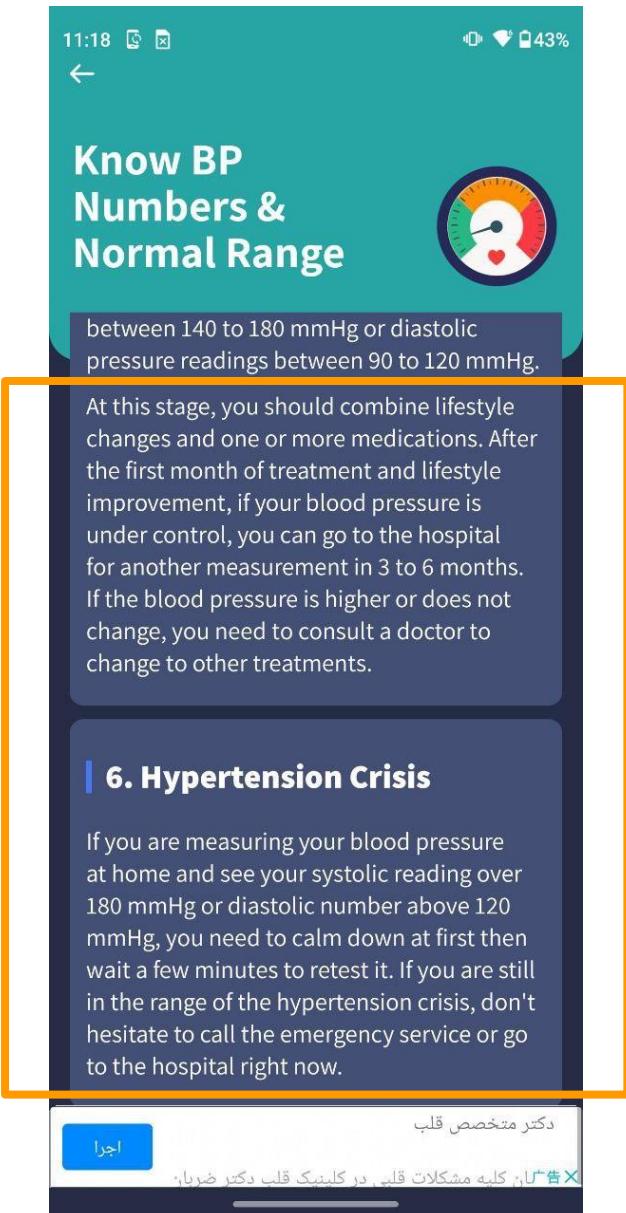
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# Our Copyrighted App

## Allegedly Infringing App

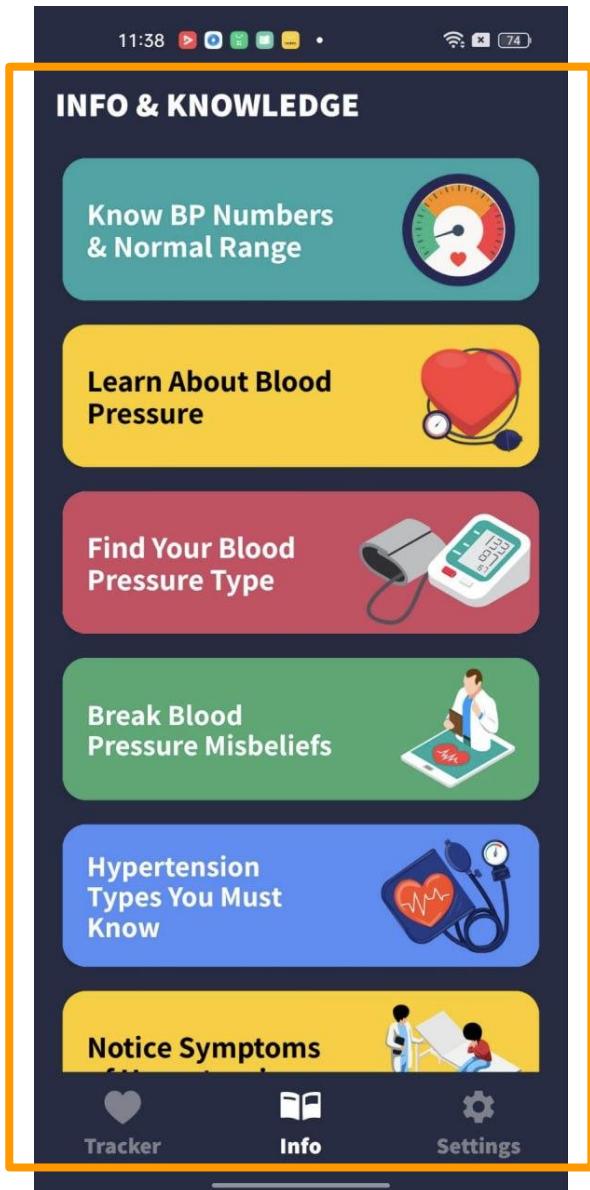
# 100% Copied our Inapp Text



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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.

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

**Our Copyrighted App**

 **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 More](#)

**About**

Initial Release Date: Jul 24, 2022  
Last Updated: Aug 10, 2022  
Version: 2022.07.24  
Content Rating: Rated for 3+

**Data Resource URL**

**Allegedly Infringing App**

# **EXHIBIT B**

发件人: David Silver <[david@bayramoglu-legal.com](mailto:david@bayramoglu-legal.com)>

发送时间: 2022 年 8 月 30 日 2:35

收件人: [Trustedapp.help@gmail.com](mailto:Trustedapp.help@gmail.com) <[Trustedapp.help@gmail.com](mailto:Trustedapp.help@gmail.com)>

抄送: [TM@bayramoglu-legal.com](mailto:TM@bayramoglu-legal.com) <[tm@bayramoglu-legal.com](mailto:tm@bayramoglu-legal.com)>; [candy@bayramoglu-legal.com](mailto:candy@bayramoglu-legal.com) <[candy@bayramoglu-legal.com](mailto: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](mailto: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

**DAVID  
SILVER**  
Attorney-at-Law

Admissions: California & Nevada



1540 West Warm Springs Road, Suite 100,  
Henderson, NV 89014  
(702) 462-5973  
[www.bayramoglu-legal.com](http://www.bayramoglu-legal.com)

EVERY PERSON WHO  
WALKS THROUGH  
OUR DOOR IS  
IMPORTANT TO US

---

**From:** David Silver  
**Sent:** Monday, August 29, 2022 11:30 AM  
**To:** [Trustedapp.help@gmail.com](mailto:Trustedapp.help@gmail.com) <[Trustedapp.help@gmail.com](mailto:Trustedapp.help@gmail.com)>; [hr@apero.vn](mailto:hr@apero.vn) <[hr@apero.vn](mailto:hr@apero.vn)>  
**Cc:** [TM@bayramoglu-legal.com](mailto:TM@bayramoglu-legal.com) <[tm@bayramoglu-legal.com](mailto:tm@bayramoglu-legal.com)>; [candy@bayramoglu-legal.com](mailto:candy@bayramoglu-legal.com) <[candy@bayramoglu-legal.com](mailto: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

**DAVID  
SILVER**  
Attorney-at-Law

Admissions: California & Nevada



1540 West Warm Springs Road, Suite 100,  
Henderson, NV 89014  
(702) 462-5973  
[www.bayramoglu-legal.com](http://www.bayramoglu-legal.com)

EVERY PERSON WHO  
WALKS THROUGH  
OUR DOOR IS  
IMPORTANT TO US

# EXHIBIT C

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

**From:** [removals@google.com](mailto:removals@google.com) <[removals@google.com](mailto:removals@google.com)>  
**Sent:** Tuesday, October 18, 2022 11:13 AM  
**To:** David Silver <[david@bayramoglu-legal.com](mailto: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](mailto: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

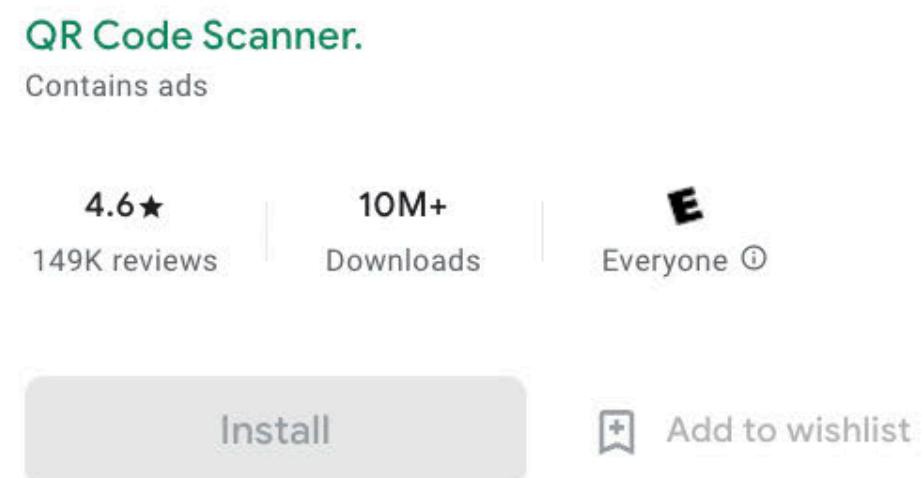
Signature

David Silver

# Supplementary Materials of Complaint

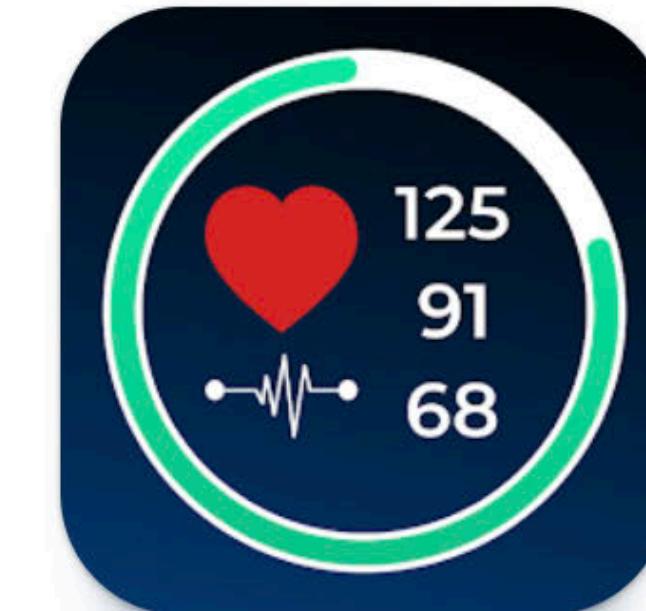
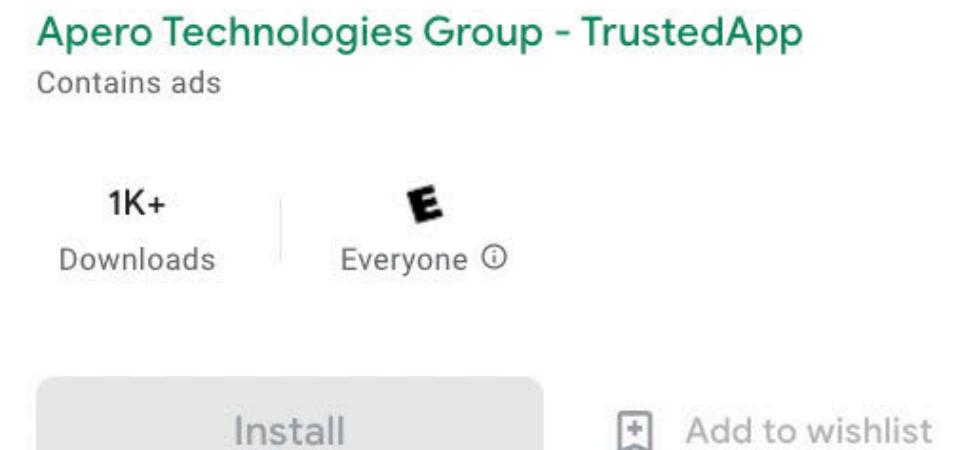
**Our Product:** <https://play.google.com/store/apps/details?id=bloodpressure.bloodpressureapp.bloodpressuretracker&gl=us>

## Blood Pressure App



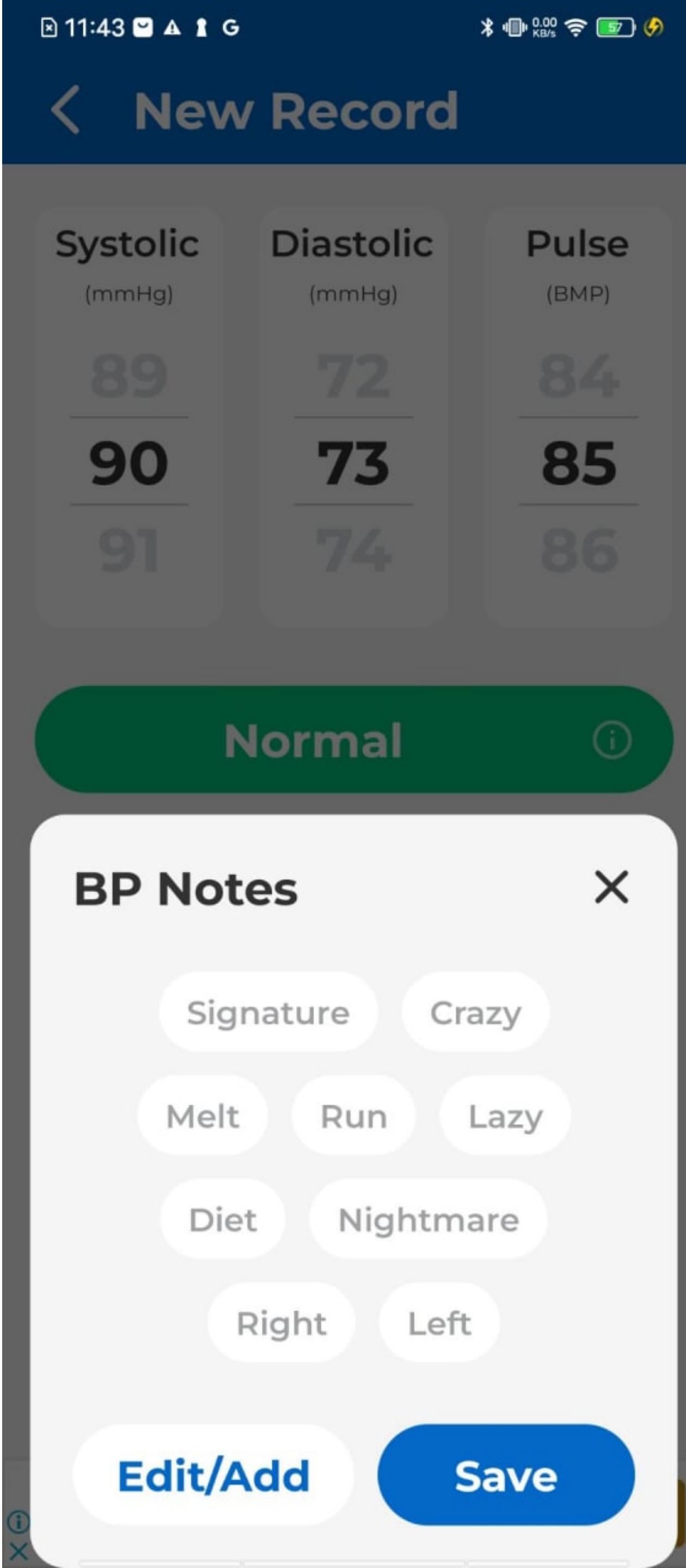
**Infringing App:** <https://play.google.com/store/apps/details?id=com.bloodpressurechecker.bpmonitor.bptracker&gl=us>

## Blood Pressure Tracker

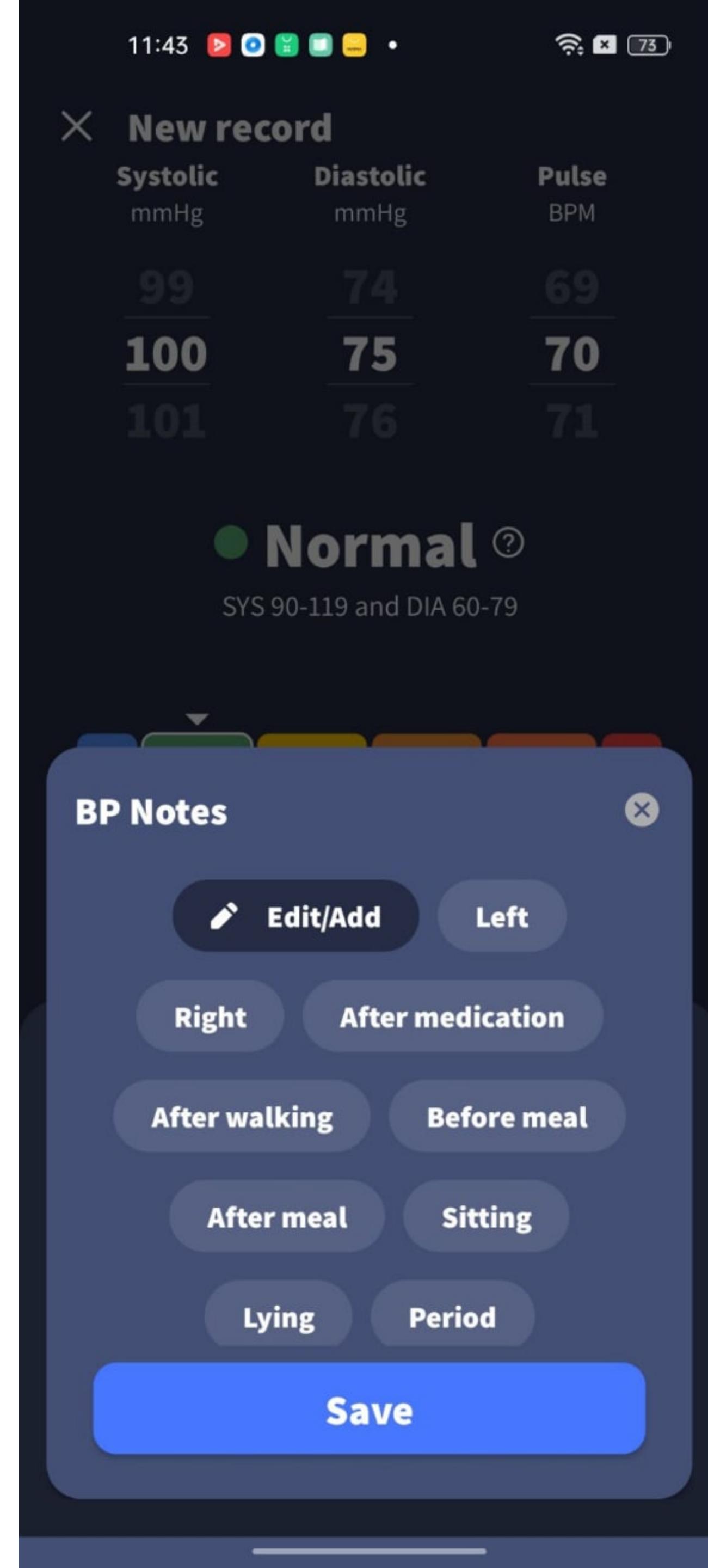


# Note页面

弹窗的卡片排版居中效果一致

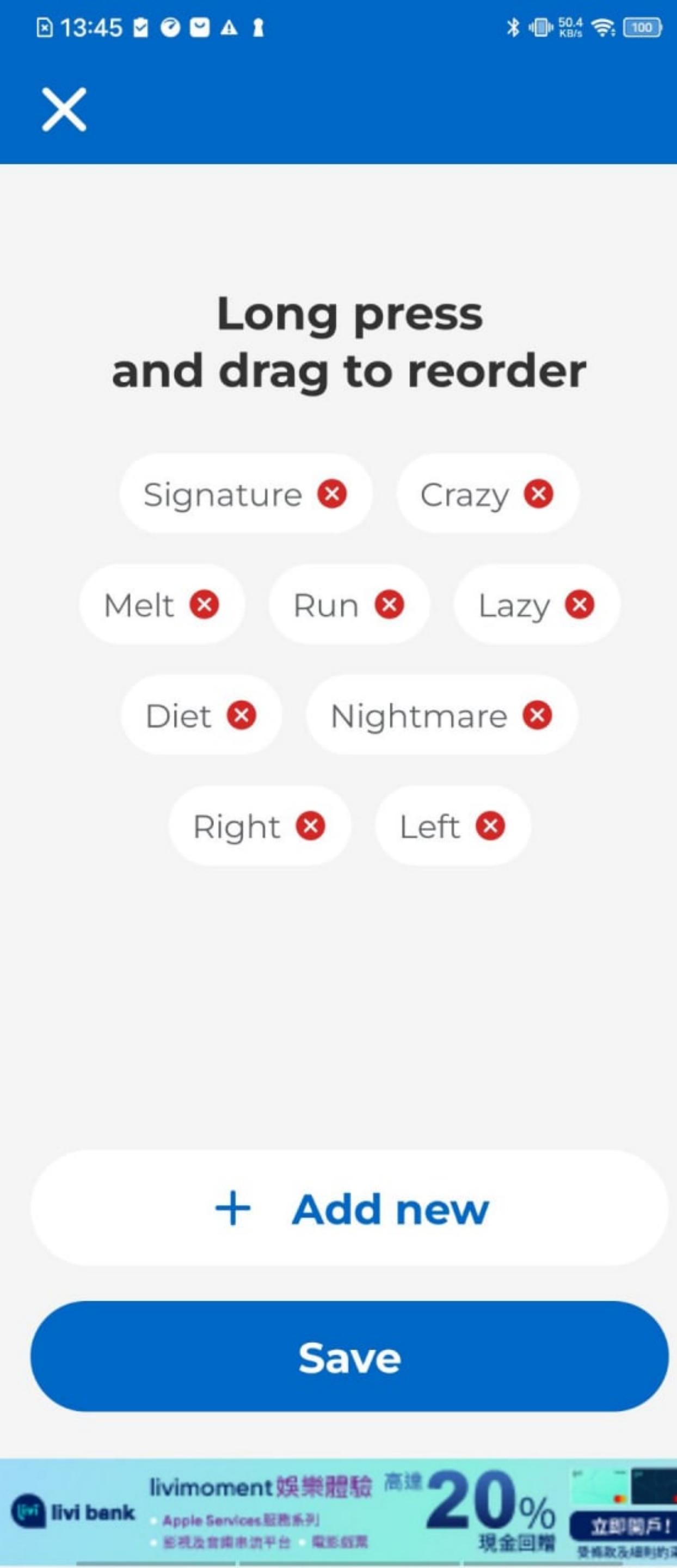


左抄袭右我们

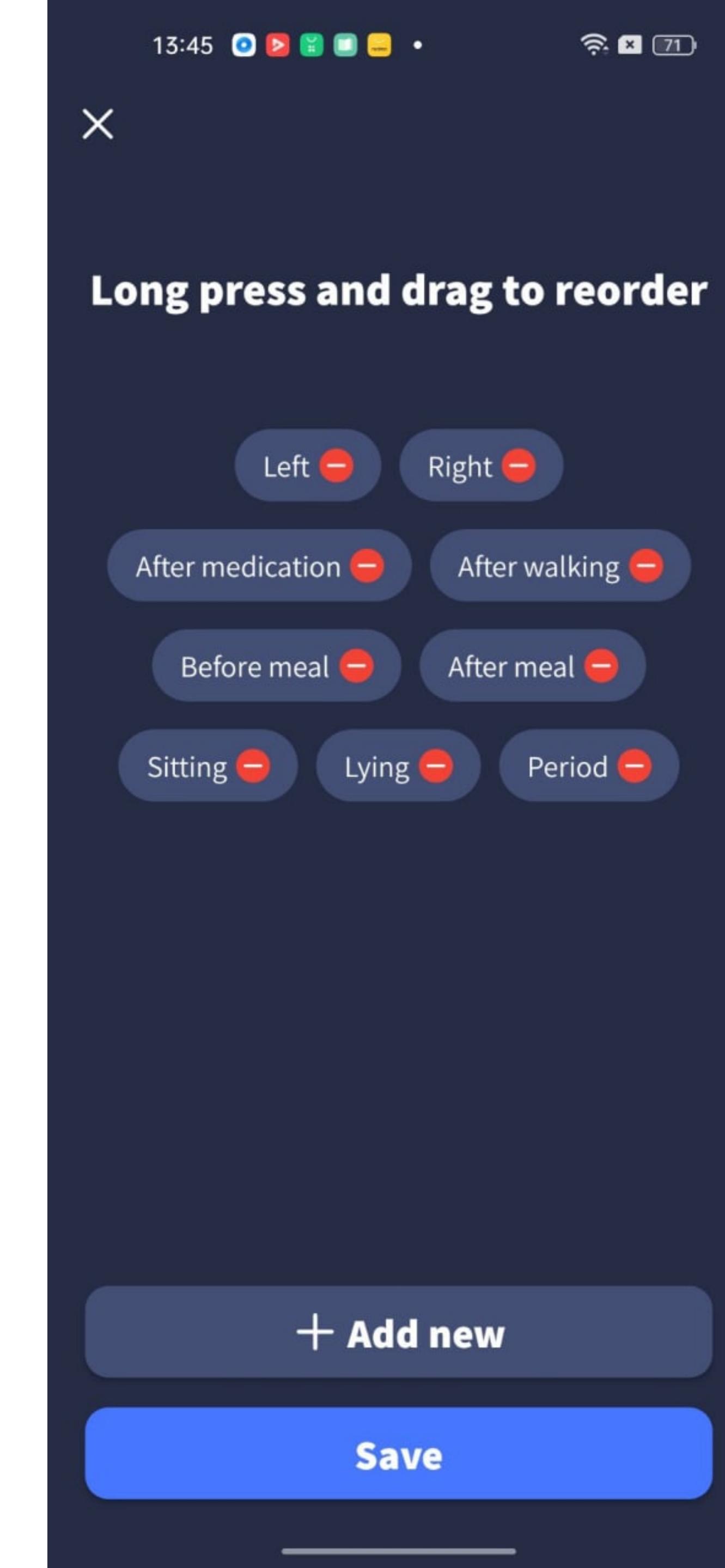


Edit note页面

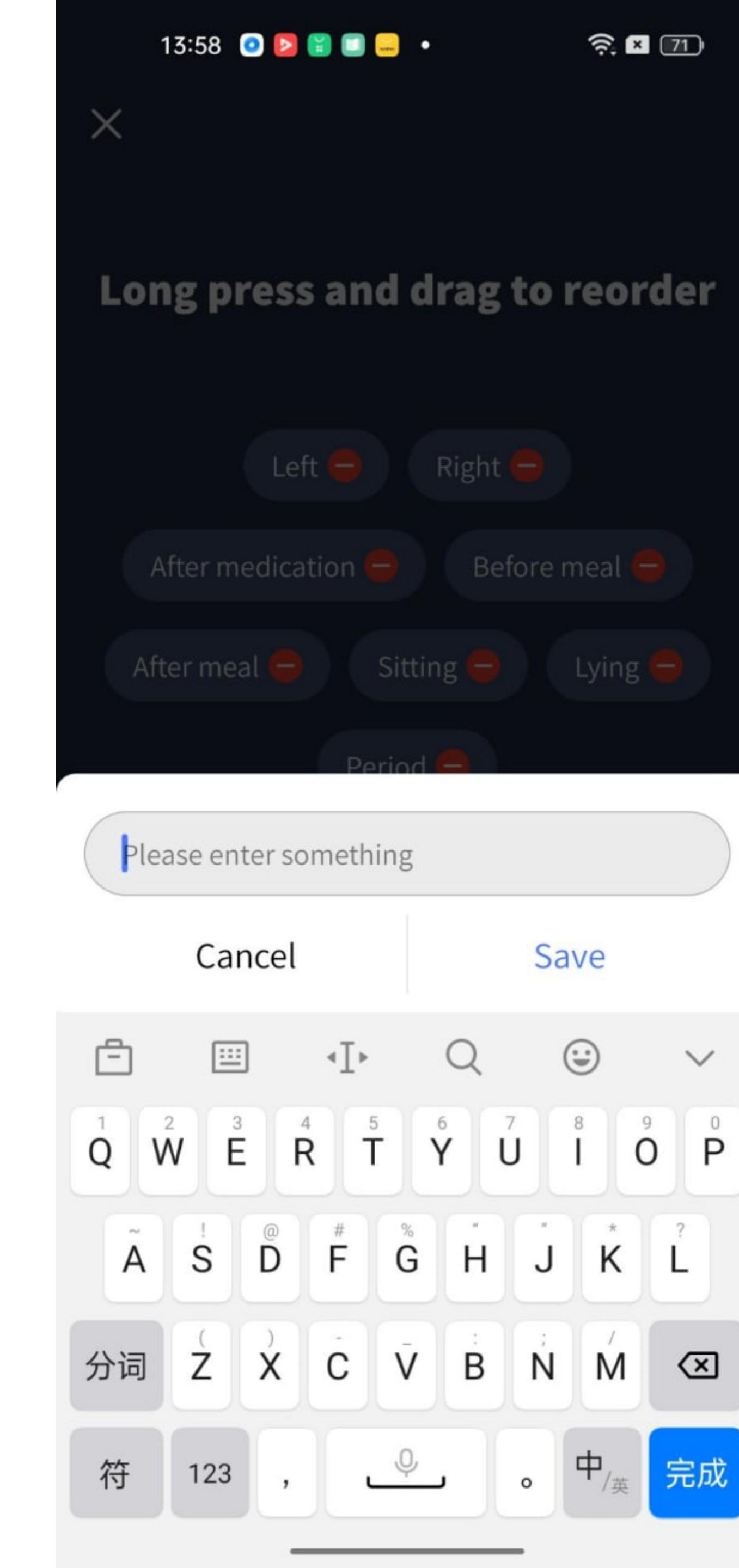
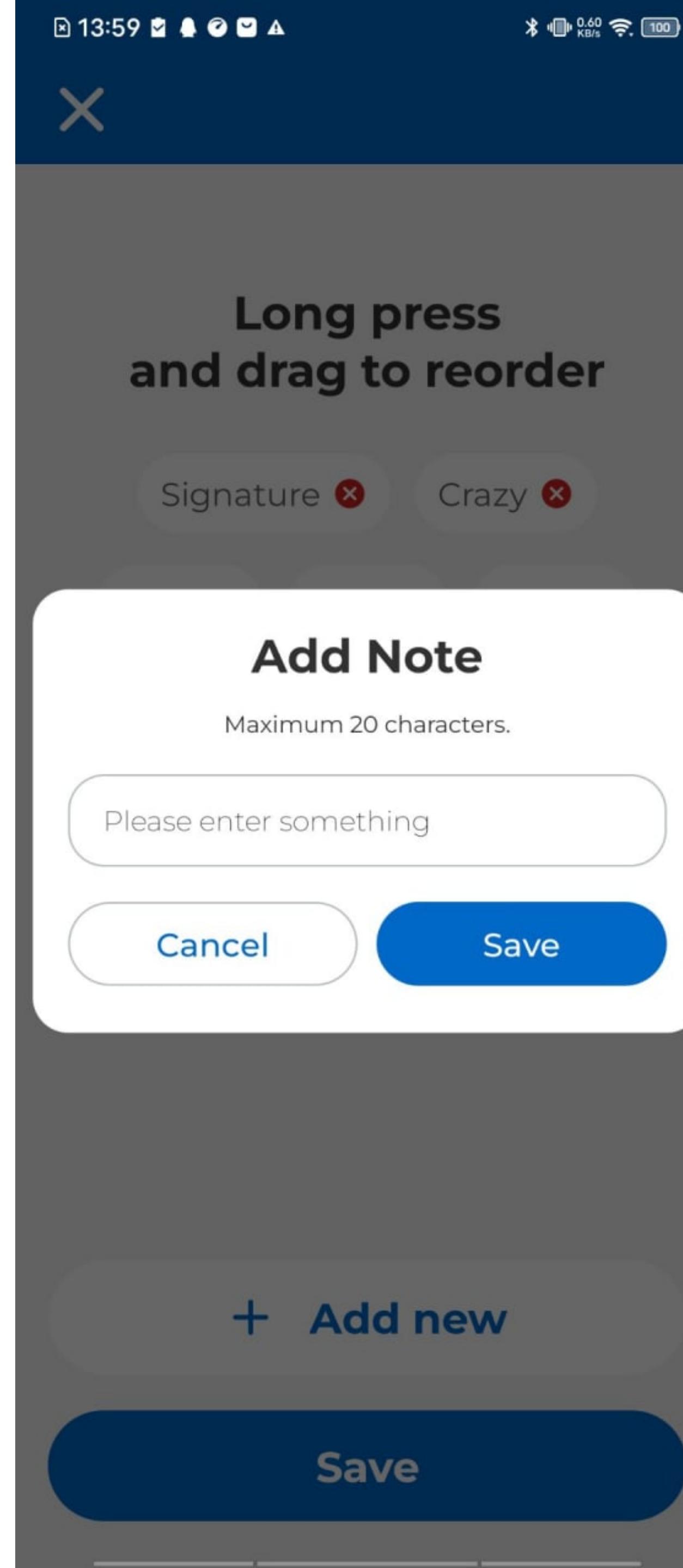
排版一致

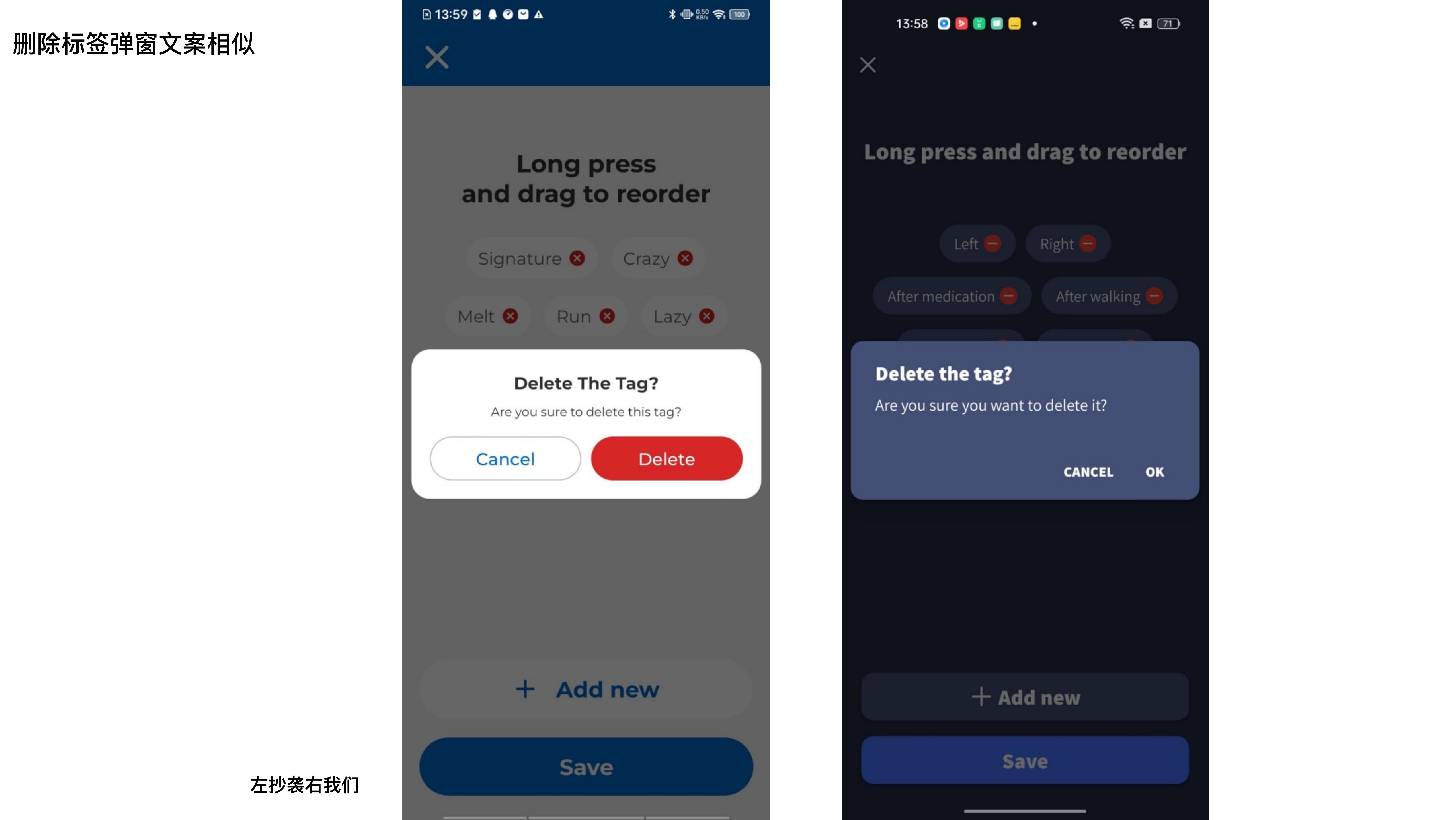


左抄袭右我们

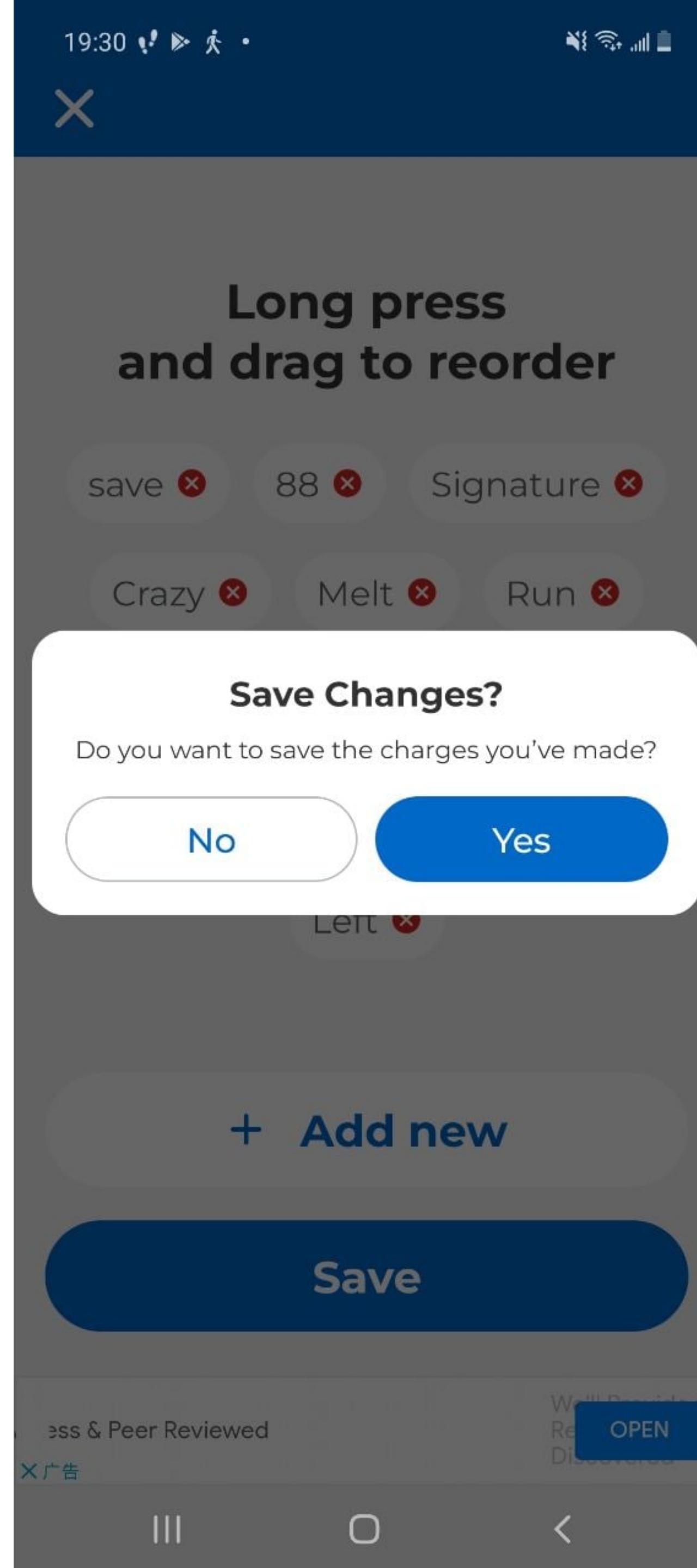


输入内容文案一致

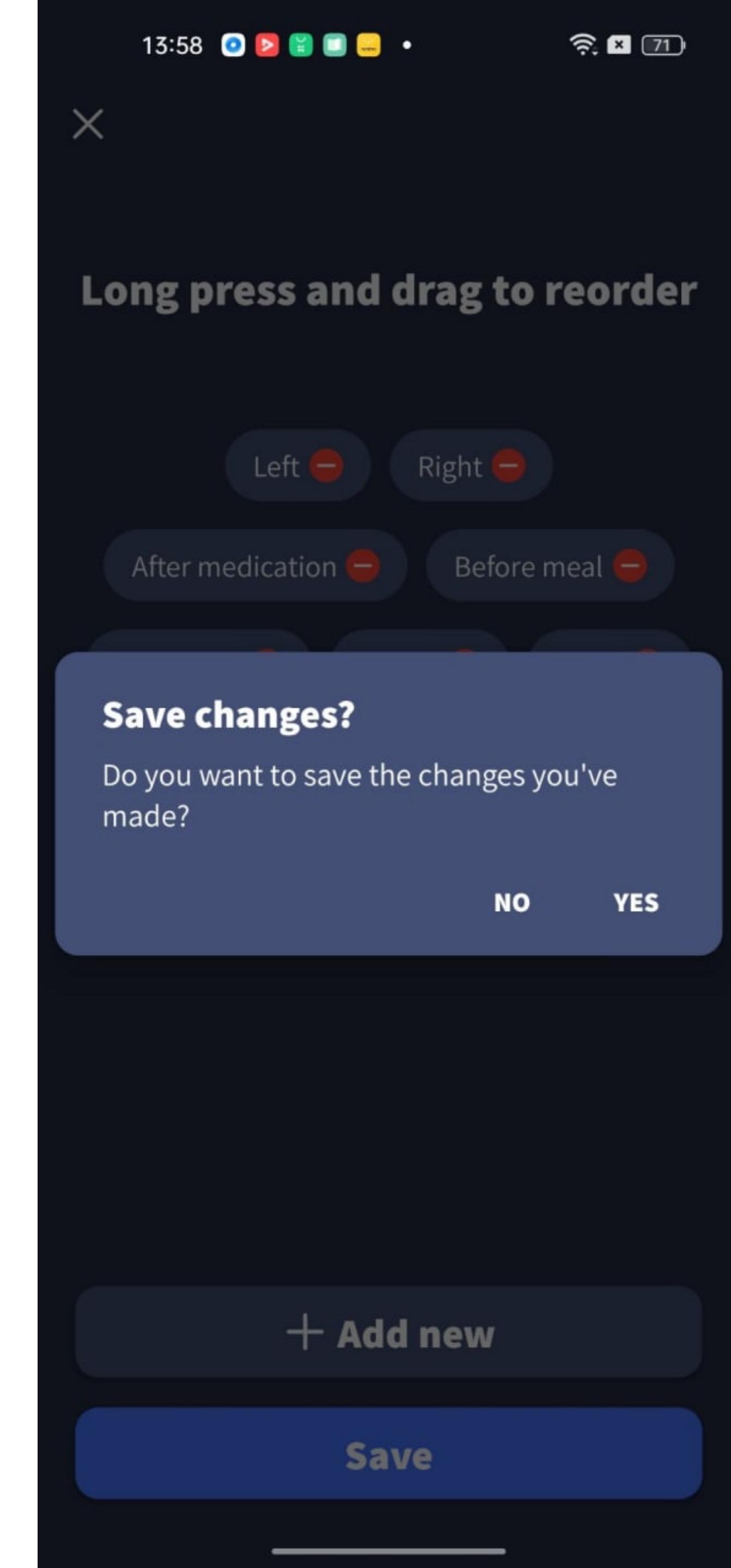


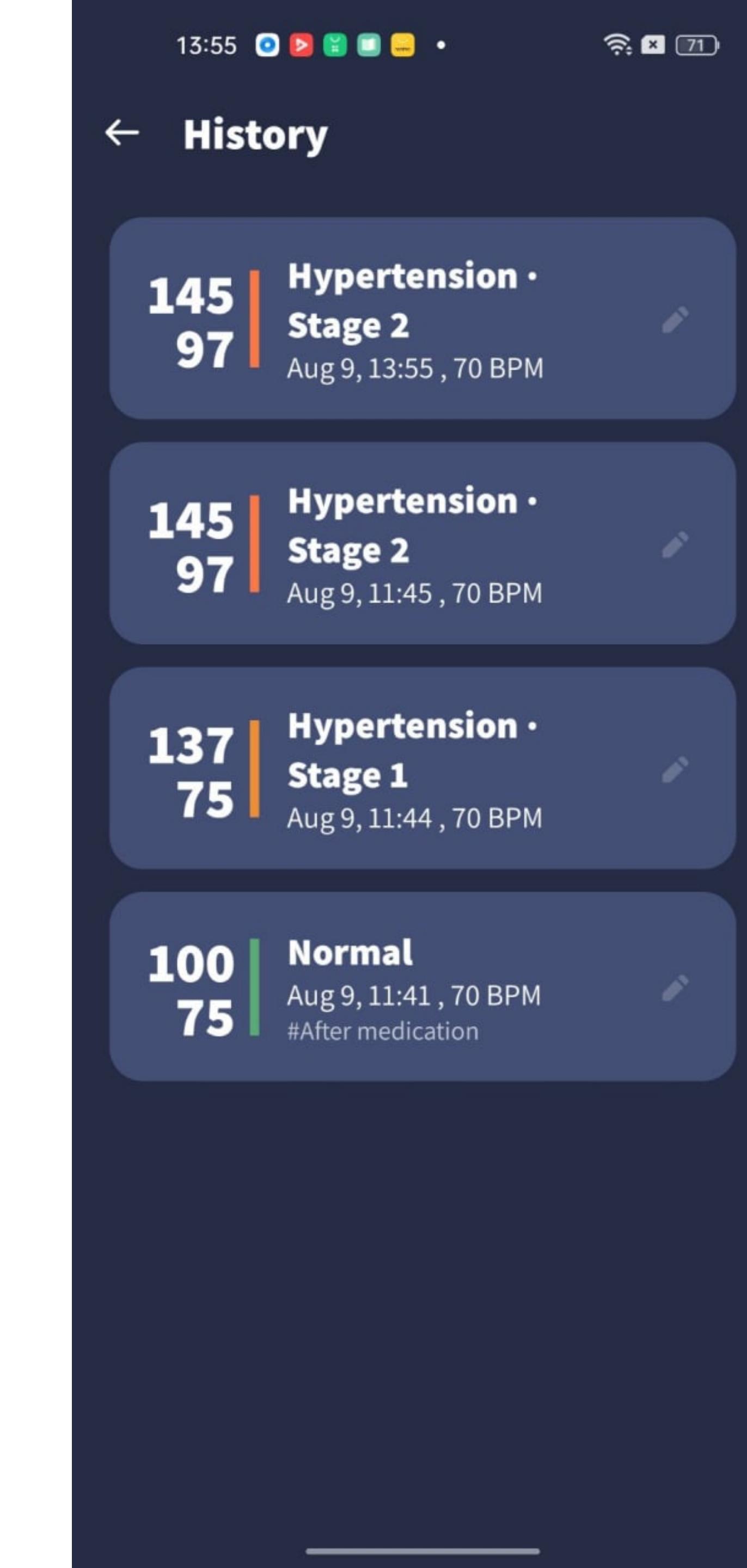
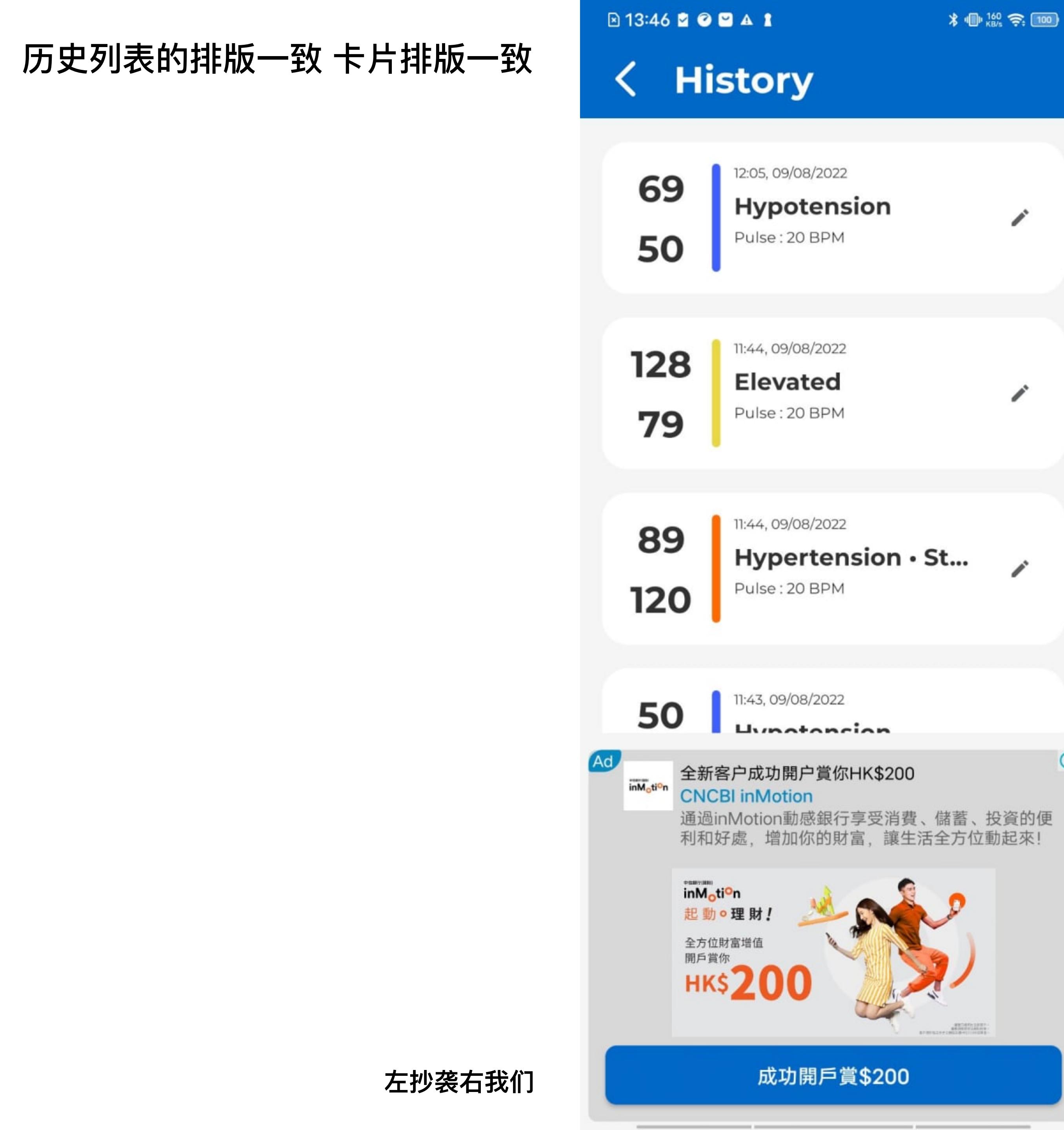


保存更改弹窗文案一致



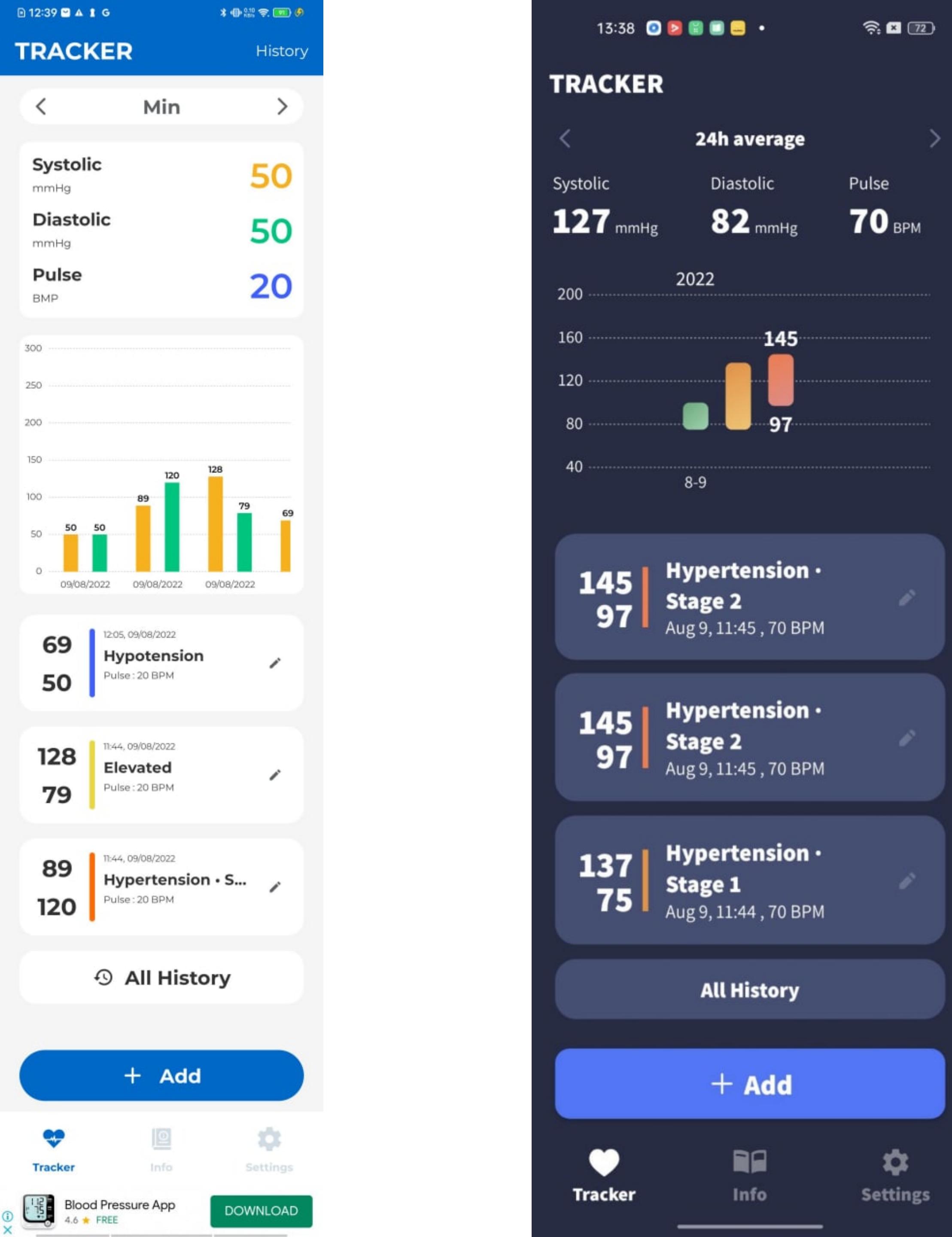
左抄袭右我们





左抄袭右我们

# Tracker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](mailto:removals@google.com) <[removals@google.com](mailto:removals@google.com)>  
**Sent:** Friday, December 23, 2022 12:33 PM  
**To:** David Silver <[david@bayramoglu-legal.com](mailto: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](mailto: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\\_9z0zRxRxOQmPJs](https://drive.google.com/drive/folders/1dKv3LbKrUBgBlrUz_9z0zRxRxOQmPJs)

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](mailto: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](mailto:removals@google.com)>  
Date: Tue, Oct 25, 2022 at 12:23 AM  
Subject: Re: Your Request to Google [5-3967000033498]  
To: <[deept thought7.5m@gmail.com](mailto:deept thought7.5m@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](mailto:google-legal-support@google.com) from the U.S., or [internationalcivil@google.com](mailto: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](https://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

[deepthought7.5m@gmail.com](mailto: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

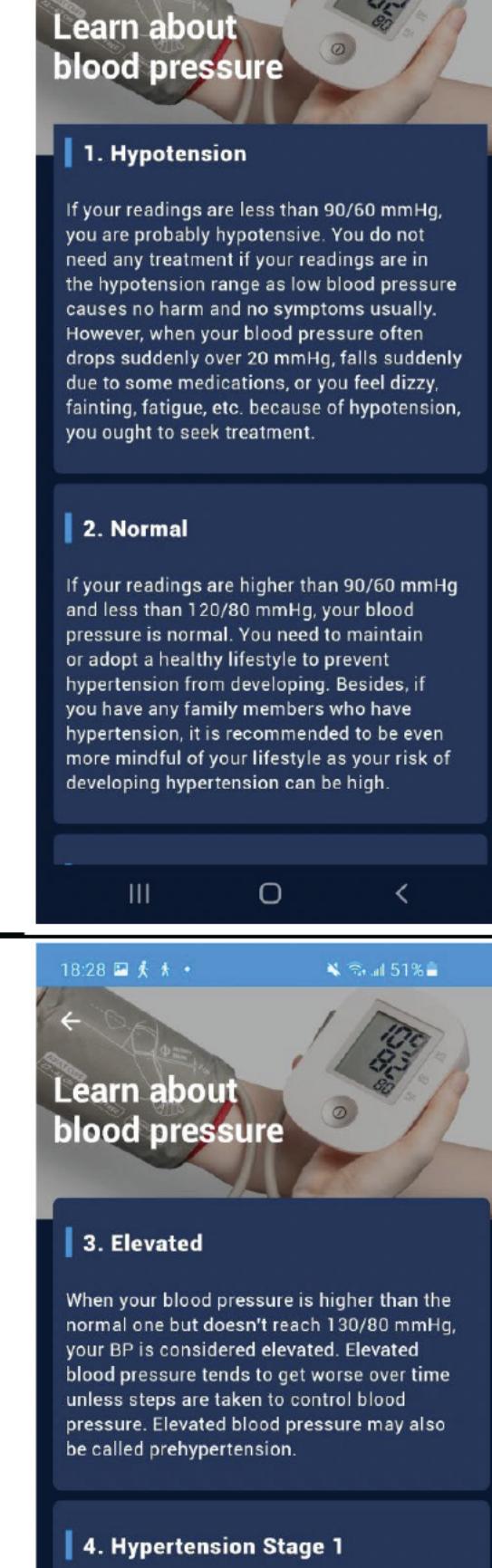
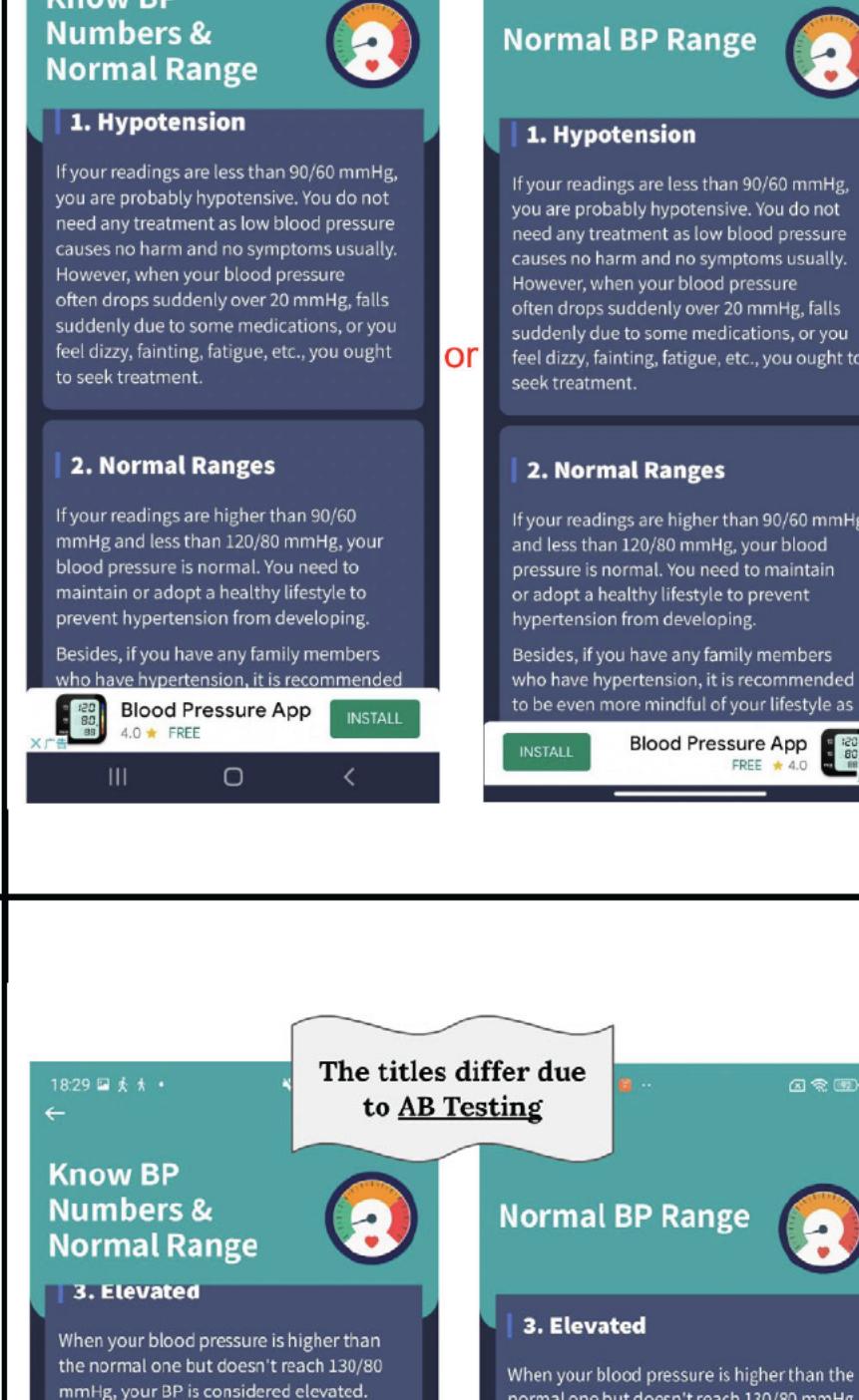
Sherry Smith

## Our Original Creatives

## Infringing Copies

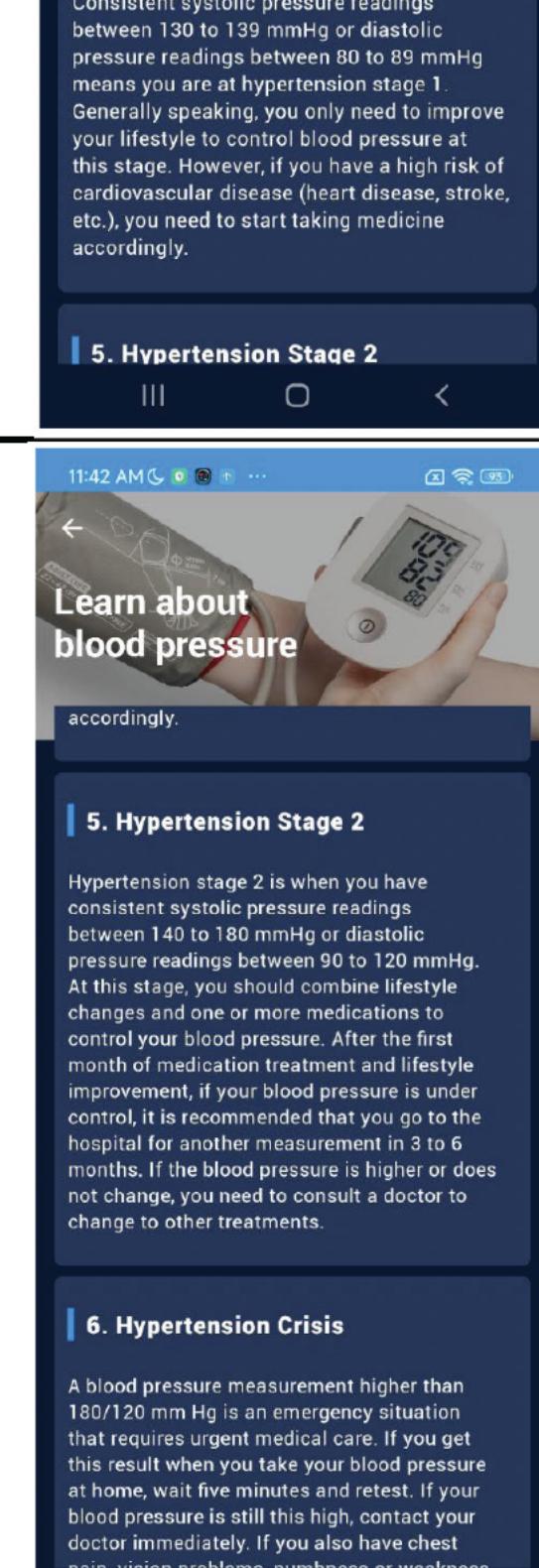
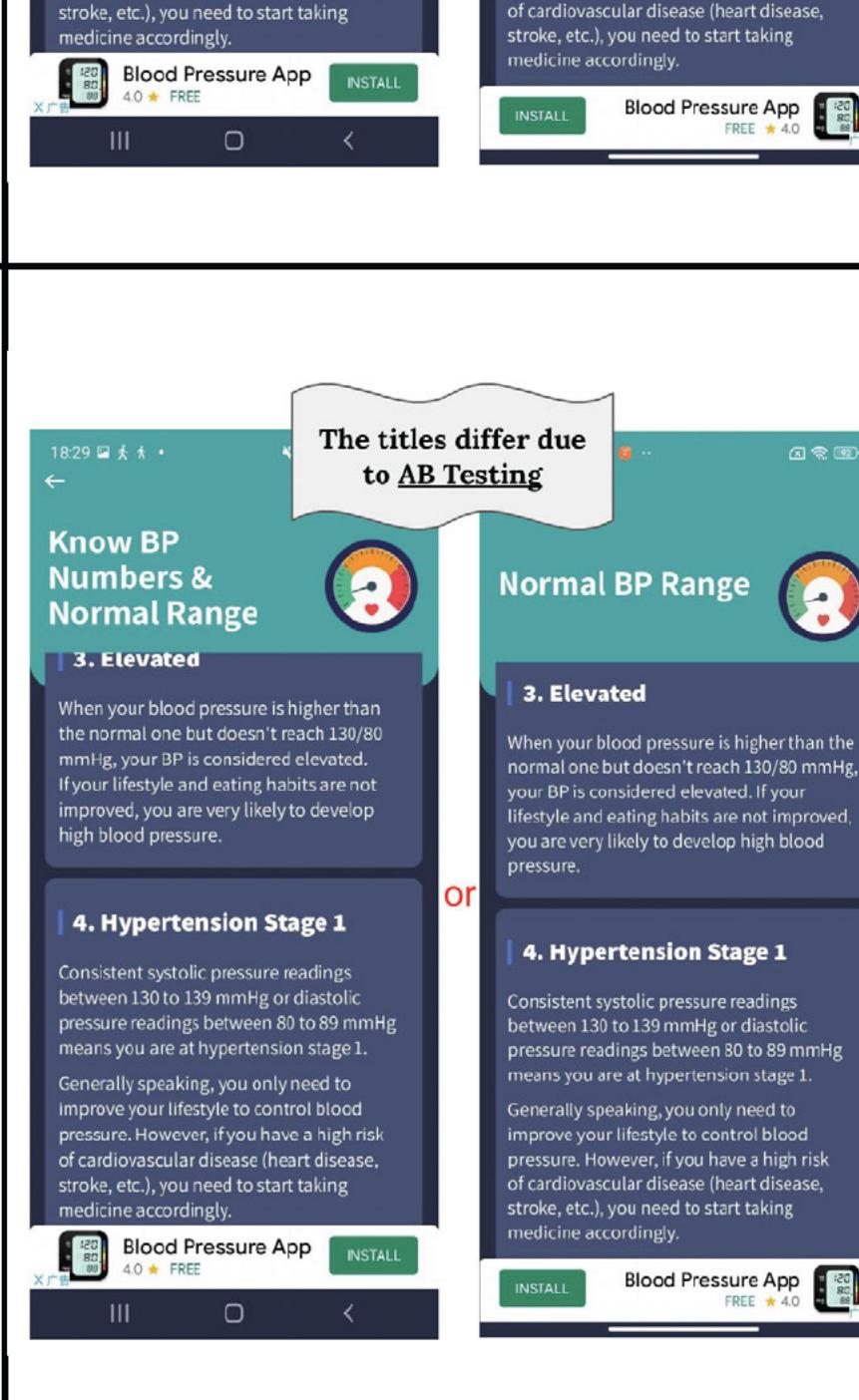
### 100% the Same

Totally the same copies of our articles as shown at right



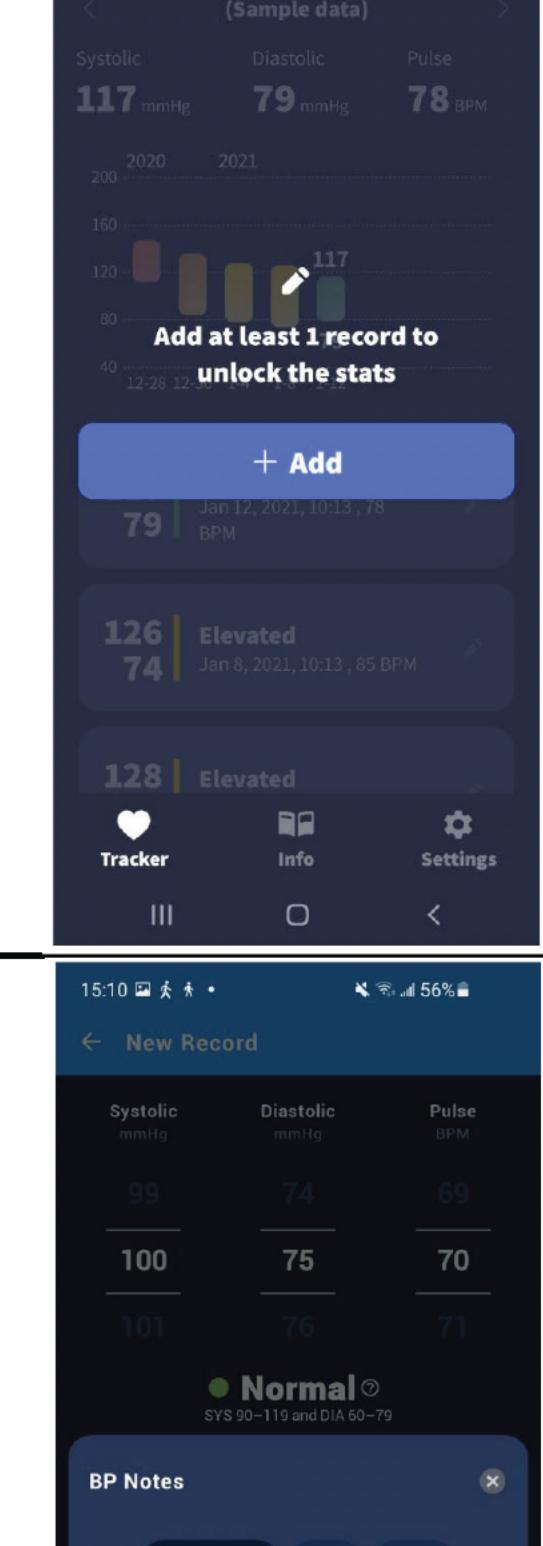
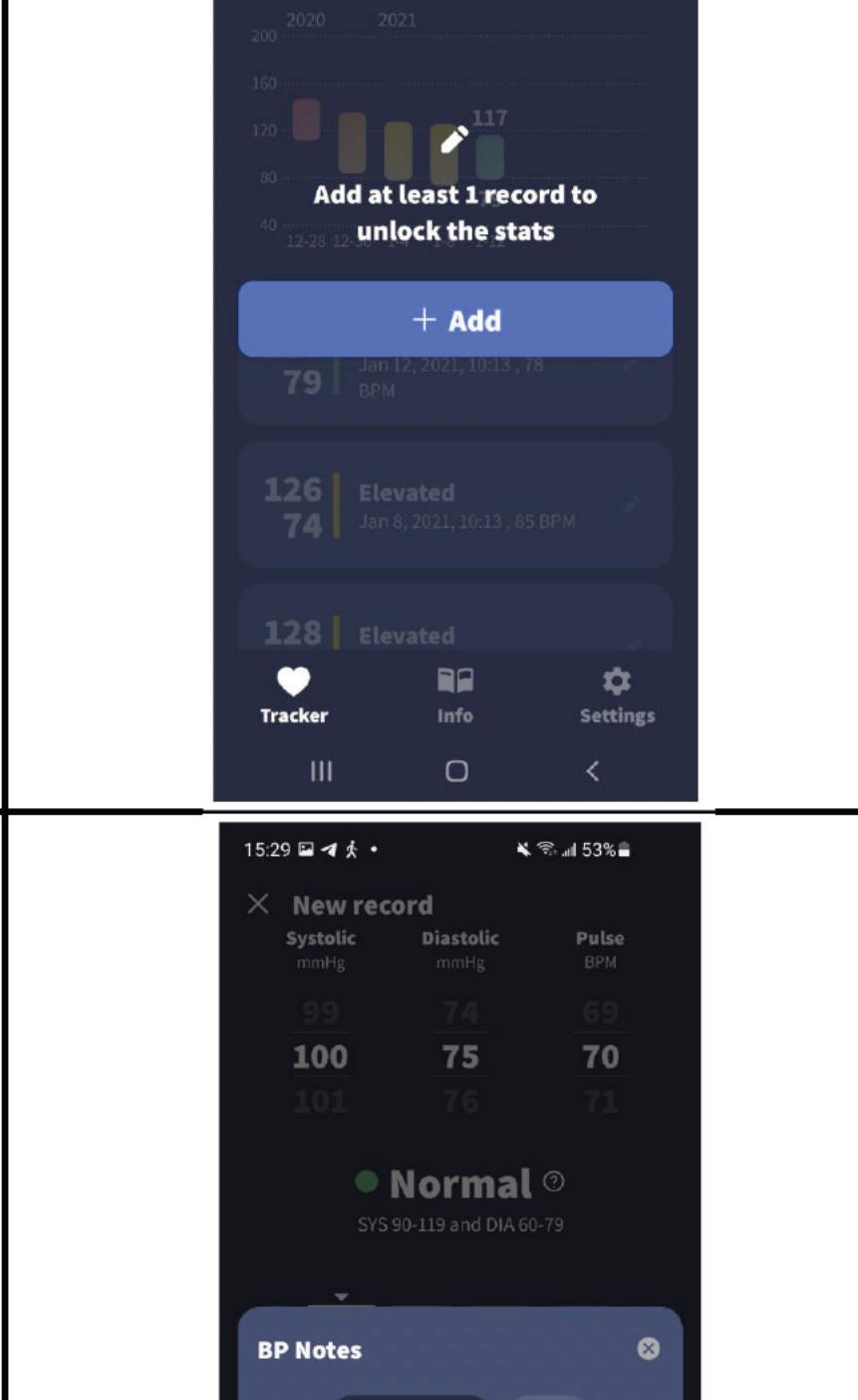
### 100% the Same

Totally the same copies of our articles as shown at right



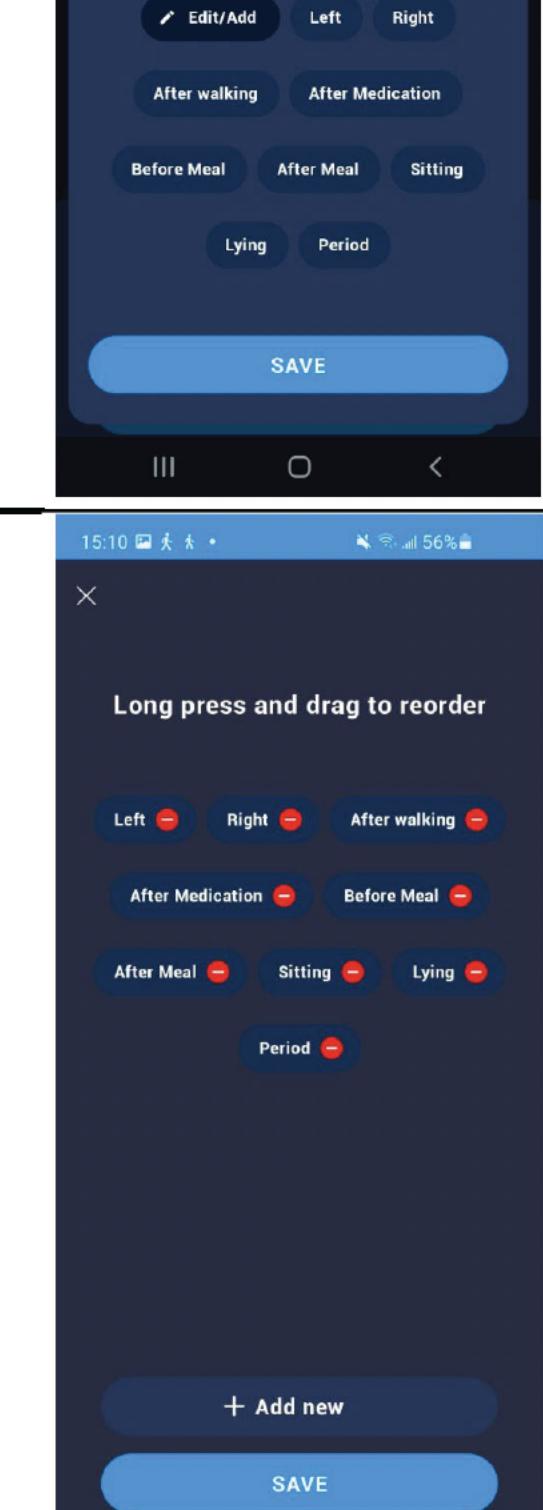
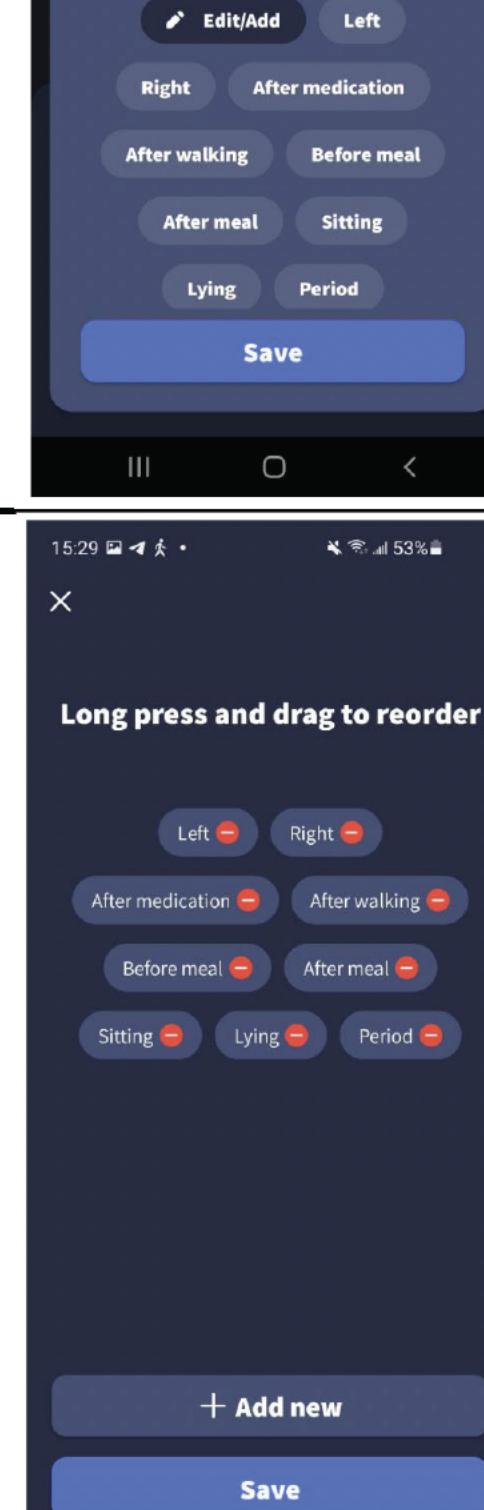
### 100% the Same

Totally the same copies of our articles as shown at right



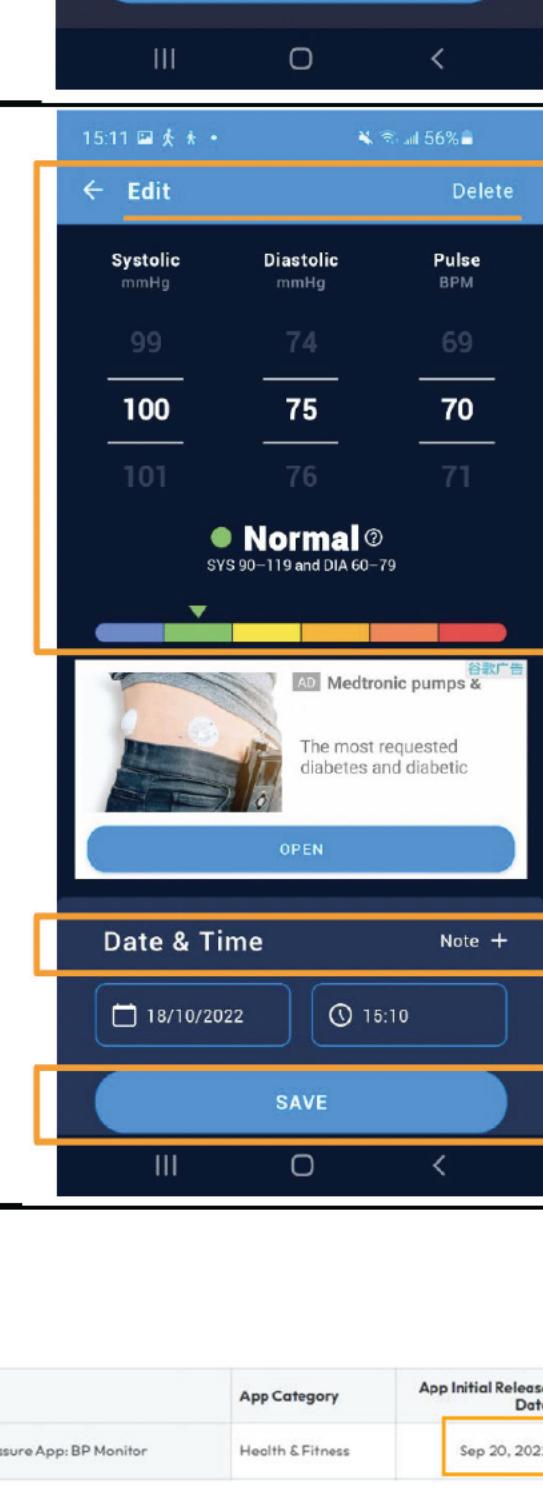
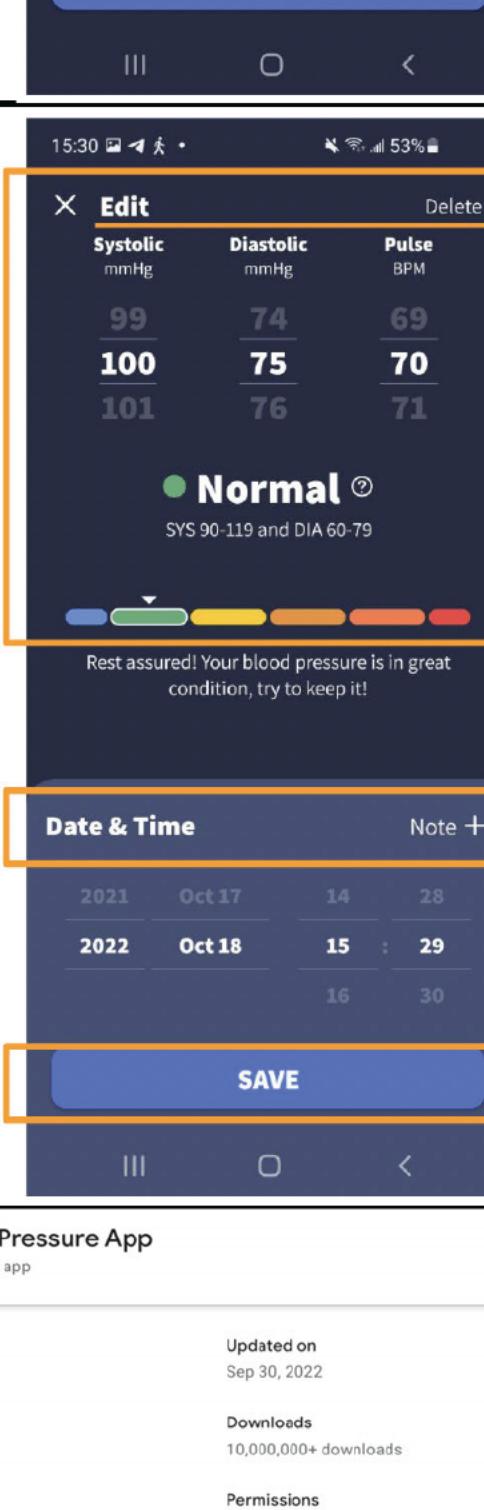
### 100% the Same

Totally the same copies of our user interface as shown at right



### 100% the Same

Totally the same copies of our user interface as shown at right



Our app was copyright protected for the **EARLIER RELEASE**

# **EXHIBIT F**

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

From: <[removals@google.com](mailto:removals@google.com)>  
Date: Thu, Dec 1, 2022 at 11:08 PM  
Subject: Re: Your Request to Google [2-7084000033674]  
To: <[deepthought7.5m@gmail.com](mailto: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](mailto:google-legal-support@google.com) from the U.S., or [internationalcivil@google.com](mailto: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](https://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

[deepthought7.5m@gmail.com](mailto:deepthought7.5m@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](mailto: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](mailto: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](mailto:info@begamob.com).

Regards,

The Google Team

For more information about our content removal process access [g.co/legal](https://www.google.com/intl/en/ads/legals/terms/content_removal.html).

## 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](mailto: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

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

## Our Copyrighted Work

### Blood Pressure App

Please find the mentioned article through the title

#### Learn About Blood Pressure



#### 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.

#### Find Your Blood Pressure Type



#### Break Blood Pressure Misbeliefs



#### Hypertension Types You Must Know



#### Notice Symptoms of Hypertension



Tracker

Info

Settings

## Infringement

### Infor & Knowledge

Ad closed by Google

Please find the mentioned article through the title

#### Learn About Blood Pressure

Sey scalper, evento gratuito. El evento comienza el 4 de diciembre. Totalmente gratis, estrategias para trading.

#### Find Your Blood Pressure Type

#### Break Blood Pressure Misbeliefs

#### Hypertension Types You Must Know

Home

Info

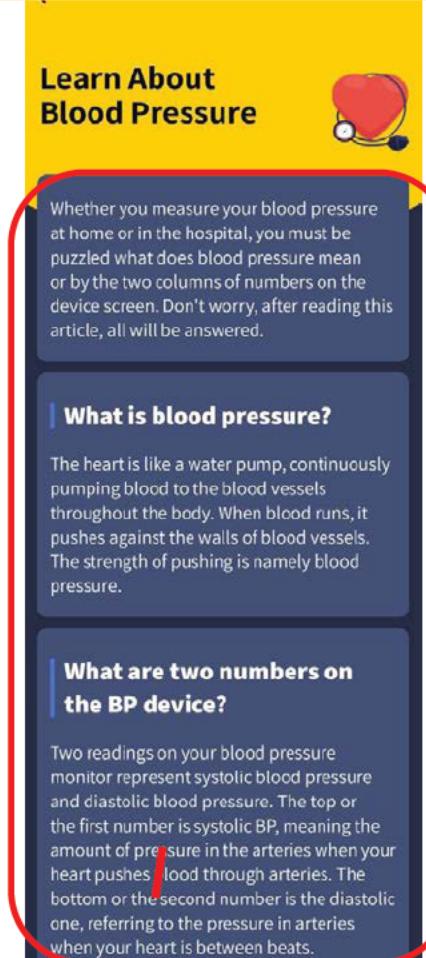
Remind

Settings

III O <

## Article 1

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



Learn About Blood Pressure

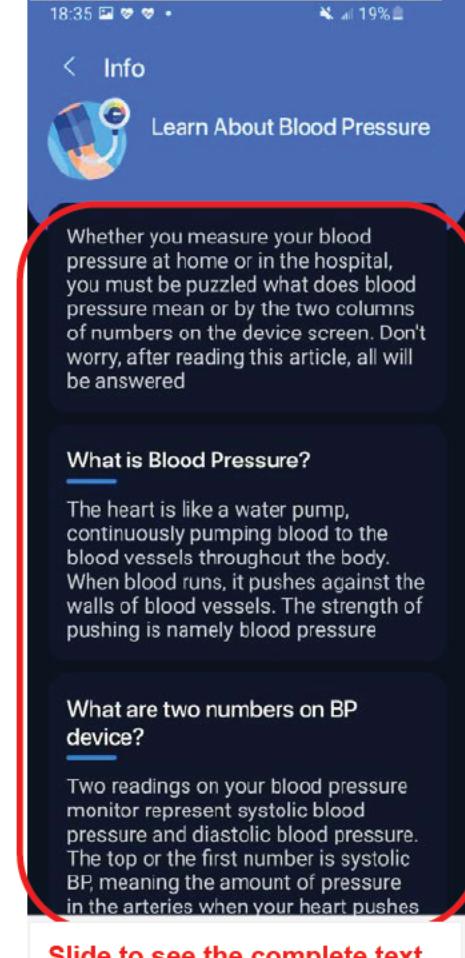
Whether you measure your blood pressure at home or in the hospital, you must be puzzled what does blood pressure mean or by the two columns of numbers on the device screen. Don't worry, after reading this article, all will be answered.

**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.



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### 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>

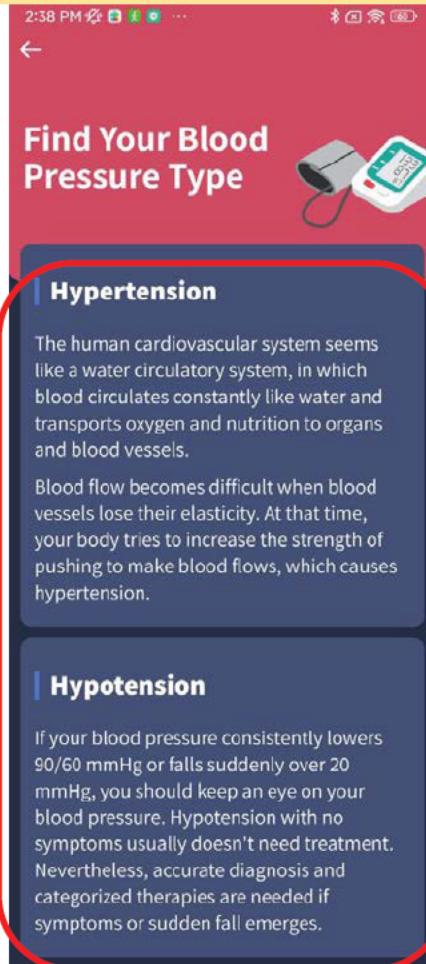
<https://www.healthline.com/health/high-blood-pressure-hypertension/blood-pressure-reading-explained>

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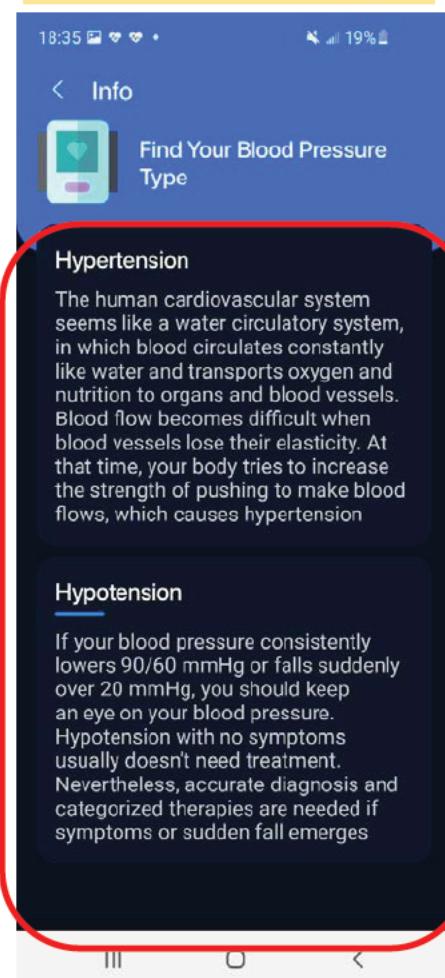
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## Article 2

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## Original Article

### Find Your Blood Pressure Type

#### <h1> Hypertension

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.

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.

#### <h1> Hypotension

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.

### Reference

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.

### Reference Website

<https://www.nhs.uk/conditions/low-blood-pressure-hypotension/>

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.

<https://www.betterhealth.vic.gov.au/health/conditionsandtreatments/blood-pressure-high-hypertension>

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### 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

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## Infringement

### Info



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

Do you know that hypertension is

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#### <h1>2. I don't have hypertension if no symptoms emerge

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.

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

Reference	Reference Website
Low blood pressure isn't anything to worry about.	<a href="https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure">https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure</a>
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.	
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.	<a href="https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-20355465#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous.">https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-20355465#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous.</a>
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.	<a href="https://www.franciscanhealth.org/community/blog/hypertension-high-blood-pressure-a-silent-killer">https://www.franciscanhealth.org/community/blog/hypertension-high-blood-pressure-a-silent-killer</a>
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.	<a href="https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure">https://www.healthgrades.com/right-care/high-blood-pressure/9-myths-about-blood-pressure</a>

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## Article 4

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## First Aid Tips for Hypotensive Crisis

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.

### 1. Lie down

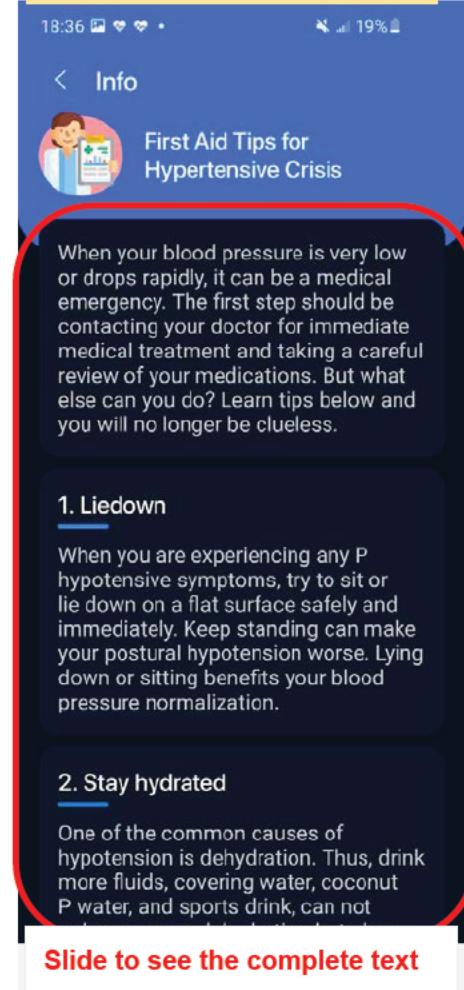
When you are experiencing any hypotensive symptoms, try to sit or lie down on a flat surface safely and immediately. Keep standing can make your postural hypotension worse. Lying down or sitting benefits your blood pressure normalization.

### 2. Stay hydrated

One of the common causes of hypotension

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## Info

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One of the common causes of hypotension is dehydration. Thus, drink more fluids, covering water, coconut P water, and sports drink, can not

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## 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><b>&lt;h1&gt;1. Liedown</b></p> <p>When you are experiencing any hypotensive symptoms, try to <a href="#">sit or lie down on a flat surface safely and immediately</a>. Keeping standing can make your postural hypotension worse. Lying down or sitting <a href="#">benefits your blood pressure normalization</a>.</p> <p><b>&lt;h1&gt;2. Stay hydrated</b></p> <p><a href="#">One of the common causes of hypotension is dehydration</a>. Thus, drinking more fluids, <a href="#">covering water, coconut water, and sports drink</a>, 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 <a href="#">improve your blood pressure or restore your glucose level</a>.</p> <p><b>&lt;h1&gt;3. Take adequate salt</b></p> <p>Try eating more salty foods or licking a pinch of salt to let the <a href="#">sodium raise your blood pressure</a>. You can also drink sports drinks or take <a href="#">oral rehydration salts (ORS)</a> which can rehydrate you and provide salt as well as other electrolytes to <a href="#">improve your blood</a></p>	<p>If you feel faint, you should <a href="#">immediately sit or lie down if you can do so safely</a>.</p> <p>The moment you experience the giddiness, dizziness, black out or any other symptom of low blood pressure, lie down <a href="#">on a flat surface</a>. Close your eyes for a few minutes or until you feel <a href="#">your pressure normalise</a>.</p> <p>Drink at least 2 to 3 litres of water every day. Besides this, include drinks like <a href="#">coconut water, bael ka sharbat and aam panna</a> 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>You can even add a pinch of salt and sugar to the water. Sodium in the salt improves your blood pressure while sugar <a href="#">helps in restoring the glucose level</a> (if caused due to low blood glucose or hypoglycaemia).</p> <p>Generally, <a href="#">the higher your sodium intake, the higher your blood pressure</a>. 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><a href="https://www.bupa.co.uk/health-information/heart-blood-circulation/low-blood-pressure-hypotension">https://www.bupa.co.uk/health-information/heart-blood-circulation/low-blood-pressure-hypotension</a></p> <p><a href="https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/">https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/</a></p> <p><a href="https://food.ndtv.com/health/home-remedies-for-low-blood-pressure-1287697">https://food.ndtv.com/health/home-remedies-for-low-blood-pressure-1287697</a></p> <p><a href="https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/">https://www.thehealthsite.com/diseases-conditions/first-aid-for-low-blood-pressure-b1215-356404/</a></p>

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## Article 5

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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

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### Infringement

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

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## Original Article

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- Stop your current task
- Take deep breaths
- Sit down or lie flat
- Listen to relaxing sounds
- Meditate

### <h1>2. Take your blood pressure medication

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.

### <h1>3. Sip a cup of hibiscus tea

## 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.medicinenet.com/how_to_lower_my_blood_pressure_immediately/article.htm)

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

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**1. Hypotension**

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.

**2. Normal Ranges**

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.

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.

**3. Elevated**

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.

**4. Hypertension Stage 1**

Consistent systolic pressure readings between 130 to 139 mmHg or diastolic pressure readings between 80 to 89 mmHg means you are at hypertension stage 1.

Generally speaking, you only need to improve your lifestyle to control blood pressure. However, if you have a high risk of cardiovascular disease (heart disease, stroke, etc.), you need to start taking medicine accordingly.

**5. Hypertension Stage 2**

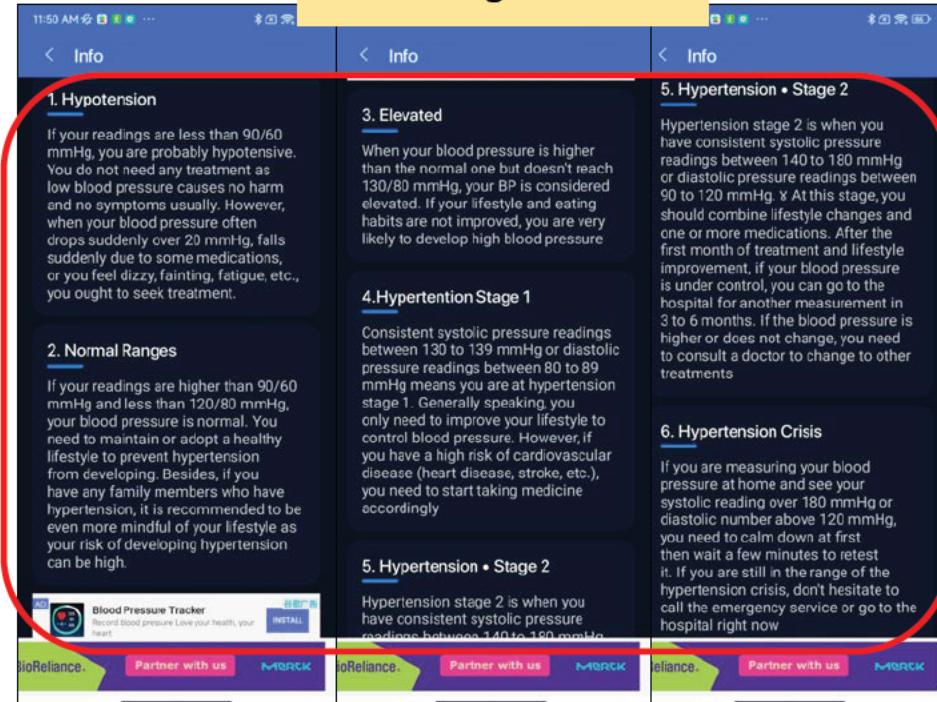
Hypertension stage 2 is when you have consistent systolic pressure readings between 140 to 180 mmHg or diastolic pressure readings between 90 to 120 mmHg. At this stage, you should combine lifestyle changes and one or more medications. After the first month of treatment and lifestyle improvement, if your blood pressure is under control, you can go to the hospital for another measurement in 3 to 6 months. If the blood pressure is higher or does not change, you need to consult a doctor to change to other treatments.

**6. Hypertension Crisis**

If you are measuring your blood pressure at home and see your systolic reading over 180 mmHg or diastolic number above 120 mmHg, you need to calm down at first then wait a few minutes to retest it. If you are still in the range of the hypertension crisis, don't hesitate to call the emergency service or go to the hospital right now.

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## Infringement



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**Blood Pressure Tracker** Record blood pressure. Love your health, your heart. **INSTALL**

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## Original Article

### Am I at a normal BP range?

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.

#### <h1>1. Hypotension

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.

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<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><a href="https://www.webmd.com/hypertension-high-blood-pressure/guide/diastolic-and-systolic-blood-pressure">https://www.webmd.com/hypertension-high-blood-pressure/guide/diastolic-and-systolic-blood-pressure</a></p> <p><a href="https://www.healthline.com/health/high-blood-pressure-hypertension/blood-pressure">https://www.healthline.com/health/high-blood-pressure-hypertension/blood-pressure</a></p> <p><a href="https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-20355465#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous.">https://www.mayoclinic.org/diseases-conditions/low-blood-pressure/symptoms-causes/syc-20355465#:~:text=Most%20doctors%20consider%20blood%20pressure,blood%20pressure%20can%20be%20dangerous.</a></p> <p><a href="https://www.nhs.uk/conditions/low-blood-pressure-hypotension/">https://www.nhs.uk/conditions/low-blood-pressure-hypotension/</a></p> <p><a href="https://www.mayoclinic.org/diseases-conditions/prehypertension/symptoms-causes/syc-20376703">https://www.mayoclinic.org/diseases-conditions/prehypertension/symptoms-causes/syc-20376703</a></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.

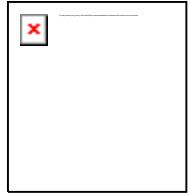
We value our relationship with your organization. Also, we hope that these steps taken demonstrate our commitment to maintaining a good relationship with your company and to protecting its hard-earned reputation.

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**

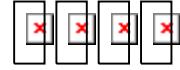
Phone: +84 394 000 881

Email: [phuongntb@ikameglobal.com](mailto:phuongntb@ikameglobal.com)

LinkedIn: [Candace Nguyen](#)

Website: [begamob.com](http://begamob.com)

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



# **EXHIBIT H**

**From:** [Shelley Ivan](#)  
**To:** [trustedapp.help@gmail.com](mailto:trustedapp.help@gmail.com); [haudt@apero.vn](mailto:haudt@apero.vn); [admin@apero.vn](mailto: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

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11 Telephone: 650.382.4546  
12 Email: zheng.liu@rimonlaw.com

13 Shelley Ivan, Esq.  
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16 New York, NY 10017  
17 Telephone: 332.600.4332  
18 Email: shelley.ivan@rimonlaw.com

19 *Attorneys for Plaintiff AKRURA PTE. LTD.*

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

AKRURA PTE. LTD., a Singapore  
company,

Plaintiff,  
v.

APERO TECHNOLOGIES GROUP, a  
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

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

7 **I. INTRODUCTION**

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

17 **II. BACKGROUND**

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

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

24 On July 24, 2022, to tap into Plaintiff’s user traffic and related income,  
25 Apero surreptitiously launched the Blood Pressure Tracker using the same content  
26 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.

## CERTIFICATE OF SERVICE

I, Shelley Ivan, hereby certify that on August 14, 2023, a true and correct copy of the foregoing **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 Service (Dkt. No. 24) as follows:

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

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

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

By: /s/ Shelley Ivan  
Shelley Ivan

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

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13 Shelley Ivan, Esq. (*pro hac vice*)  
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18 Email: shelley.ivan@rimonlaw.com

19 *Attorneys for Plaintiff* AKRURA PTE. LTD

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

AKRURA PTE. LTD, a Singapore  
company,

Plaintiff,

vs.

APERO TECHNOLOGIES GROUP, a  
Vietnam company, BEGAMOB  
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”)  
11 and Trusted Tools & Utilities Apps (“Tools”) in the above-captioned case for  
12 copyright infringement, whereby Defendants improperly copied Plaintiff’s blood  
13 pressure mobile application and offered infringing versions on Google Play.  
14 Compl., Dkt. 1.

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 14<sup>h</sup> day of August, 2023, at Santa Barbara, California.

26 /s/ Shelley Ivan  
27 Shelley Ivan

**CERTIFICATE OF SERVICE**

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:

(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.

By: /s/ Shelley Ivan  
Shelley Ivan

**From:** [Shelley Ivan](#)  
**To:** [info@begamob.com](mailto: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  
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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

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4 400N Los Angeles, CA 90067  
5 Telephone: 310.561.5776  
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12 Email: zheng.liu@rimonlaw.com

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

19 *Attorneys for Plaintiff AKRURA PTE. LTD.*

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

AKRURA PTE. LTD., a Singapore  
company,

Plaintiff,  
v.

APERO TECHNOLOGIES GROUP, a  
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  
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PROCEDURE**

Dist. Judge: Hon. Josephine L. Staton

Mag. Judge: Hon. Karen L. Stevenson

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2 attorneys of record, files this motion for entry of default by the Court’s Clerk  
3 against Defendants Apero Technologies Group (“Apero”), Begamob Global  
4 (“Begamob”), and Trusted Tools & Utilities Apps (“Tools”) (collectively,  
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7 **I. INTRODUCTION**

8 Plaintiff’s motion is meritorious and should be granted. Defendant Apero  
9 stole Plaintiff’s copyrighted blood pressure mobile application available on Google  
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11 targeting the same consumers. After Plaintiff filed with Google a DMCA  
12 takedown request to remove the infringing content, Apero started offering  
13 substantially the same infringing counterfeits through the other two defendants,  
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24 On July 24, 2022, to tap into Plaintiff’s user traffic and related income,  
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4        On December 13, 2022, Google removed Apero's application in response to  
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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  
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12       Notably, several weeks after Plaintiff's first DMCA Takedown Request  
13 regarding Apero's application, Apero launched infringing Tool and Begamob  
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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.

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24 due on June 8, 2023.

25       **III. POINTS AND AUTHORITY**

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3 *Clarendon Am. Inc.*, 244 F.R.D. 317, 348 (E.D. Va. 2007) (“Before the plaintiff  
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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.

## **CERTIFICATE OF SERVICE**

I, Shelley Ivan, hereby certify that on August 14, 2023, a true and correct copy of the foregoing **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 Service (Dkt. No. 24) as follows:

(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.

By: /s/ Shelley Ivan  
Shelley Ivan

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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7 Zheng Liu, Esq. (SBN: 229311)  
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13 Shelley Ivan, Esq. (*pro hac vice*)  
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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”)  
11 and Trusted Tools & Utilities Apps (“Tools”) in the above-captioned case for  
12 copyright infringement, whereby Defendants improperly copied Plaintiff’s blood  
13 pressure mobile application and offered infringing versions on Google Play.  
14 Compl., Dkt. 1.

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 14<sup>h</sup> day of August, 2023, at Santa Barbara, California.

26 /s/ Shelley Ivan  
27 Shelley Ivan

**CERTIFICATE OF SERVICE**

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:

(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.

By: /s/ Shelley Ivan  
Shelley Ivan

**From:** [Shelley Ivan](#)  
**To:** [liveroyalstudio.inc@gmail.com](mailto: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](#)

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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](mailto:shelley.ivan@rimonlaw.com)

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

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

19 *Attorneys for Plaintiff AKRURA PTE. LTD.*

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

AKRURA PTE. LTD., a Singapore  
company,

Plaintiff,  
v.

APERO TECHNOLOGIES GROUP, a  
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

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

7 **I. INTRODUCTION**

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

17 **II. BACKGROUND**

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

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

24 On July 24, 2022, to tap into Plaintiff’s user traffic and related income,  
25 Apero surreptitiously launched the Blood Pressure Tracker using the same content  
26 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.

## CERTIFICATE OF SERVICE

I, Shelley Ivan, hereby certify that on August 14, 2023, a true and correct copy of the foregoing **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 Service (Dkt. No. 24) as follows:

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

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

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

By: /s/ Shelley Ivan  
Shelley Ivan

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17 Telephone: 332.600.4332  
18 Email: shelley.ivan@rimonlaw.com

19 *Attorneys for Plaintiff* AKRURA PTE. LTD

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

AKRURA PTE. LTD, a Singapore  
company,

Plaintiff,

vs.

APERO TECHNOLOGIES GROUP, a  
Vietnam company, BEGAMOB  
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”)  
11 and Trusted Tools & Utilities Apps (“Tools”) in the above-captioned case for  
12 copyright infringement, whereby Defendants improperly copied Plaintiff’s blood  
13 pressure mobile application and offered infringing versions on Google Play.  
14 Compl., Dkt. 1.

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 14<sup>h</sup> day of August, 2023, at Santa Barbara, California.

26 /s/ Shelley Ivan  
27 Shelley Ivan

**CERTIFICATE OF SERVICE**

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:

(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.

By: /s/ Shelley Ivan  
Shelley Ivan

# **EXHIBIT I**

## Shelley Ivan

---

**From:** Shelley Ivan  
**Sent:** Tuesday, August 22, 2023 6:54 PM  
**To:** [removals@google.com](mailto:removals@google.com)  
**Cc:** [deepthought7.5m@gmail.com](mailto: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](mailto: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](mailto: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](mailto: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/1qV7x0aOx08BDCPhv1huQrZNOHChBFYA8wS1ARB3yjcw/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

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

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Regards,

The Google Team

*For more information about our content removal process, see [g.co/legal](https://www.google.com/intl/en/legal/policies/content-removal/).*

## 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](mailto:deepthought7.5m@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