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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 v.

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

Defendants.

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

**PLAINTIFF'S NOTICE OF WAIVER
OF ORAL ARGUMENT ON MOTION
FOR DEFAULT JUDGMENT**

Hearing Date: January 5, 2024
Time: 10:30 a.m.
Courtroom 8A

Judge: Hon. Josephine L. Staton
Magistrate Judge: Hon. Karen L.
Stevenson

1 NOTICE IS HEREBY GIVEN pursuant to Local Rule 7-15 that, having
2 received no opposition to its Renewed Motion for Default Judgment against the
3 defendants, Begamob Global (“Begamob”) and Trusted Tools & Utilities Apps
4 (“Tools”), which is set for hearing on Friday, January 5, 2024, at 10:30 a.m., in
5 Courtroom 8A, before the Honorable Josephine L. Staton, plaintiff Akrura PTE.
6 LTD (“Plaintiff”) hereby advises the Court that it waives oral argument.¹

7 Plaintiff further advised the Court that Plaintiff has agreed to set aside
8 default against defendant Apero Technologies Group and to vacate the hearing as
9 to that defendant.

10 Plaintiff thus respectfully requests that the Court consent to Plaintiff’s oral
11 argument waiver and cancel the hearing scheduled for January 5, 2024. Plaintiff
12 further asks the court clerk to advise the parties by noon on January 4, 2024, as to
13 whether the Court has consented to the oral argument waiver and hearing
14 cancellation.

15 Dated: December 18, 2023

RIMON, P.C.

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18 By: /s/ Mark S. Lee

Mark S. Lee (SBN: 94103)

19 Zheng Liu (SBN: 229311)

20 Shelley Ivan (*pro hac vice*)

21 Attorneys for Plaintiff AKRURA PTE.
22 LTD.

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27 ¹ In case defendants Begamob and Tools enter an appearance before the January 5,
28 2024 hearing, Plaintiff reserves the right to oral argument.

1 **CERTIFICATE OF SERVICE**

2 I, Shelley Ivan, hereby certify that on December 18, 2023, a true correct
3 copy of the foregoing **PLAINTIFF’S NOTICE OF WAIVER OF ORAL**
4 **ARGUMENT ON MOTION FOR DEFAULT JUDGMENT** was served upon
5 Defendants, pursuant to the Court’s April 7, 2023 Order Granting Plaintiff’s Ex
6 Parte Motion for Alternative Service (Dkt. No. 24) as follows:

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

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

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

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19 By: /s/ Shelley Ivan
20 Shelley Ivan
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