

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
FLORIDA

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals,
Corporations, Limited Liability Companies, Partnerships and
Unincorporated Associations Identified in Schedule A

Hong Kong Leyuzhen Technology · No. 1:25-cv-21899-GAYLES · Decided April 21, 2026

SUMMARY

The United States District Court for the Southern District of Florida grants in part and denies in part Plaintiff Hong Kong Leyuzhen Technology Co. Limited’s motion to dismiss counterclaims. The Court dismisses the defendants’ declaratory judgment counterclaim as redundant of the underlying copyright infringement claim and related affirmative defense, but allows the tortious interference counterclaim to proceed beyond the pleading stage.

CASE DETAILS

COURT	United States District Court for the Southern District of Florida
JURISDICTION	United States District Court for the Southern District of Florida
DECIDED	April 21, 2026
DOCKET	1:25-cv-21899-GAYLES
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved under Federal Rule of Civil Procedure 12(b)(6) to dismiss counterclaims for declaratory judgment and tortious interference with business relationships.
STANDARD OF REVIEW	The court considered whether the counterclaims stated claims under Federal Rule of Civil Procedure 12(b)(6).
PRECEDENTIAL VALUE	unpublished district court order

TOPICS

- motions to dismiss
- copyright infringement
- civil procedure
- intentional interference with expectancy
- commercial litigation

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the declaratory-judgment counterclaim should be dismissed as redundant because resolution of Plaintiff's copyright infringement claim and Defendants' affirmative defenses would resolve the same issues.
2. Whether Defendants adequately alleged a claim for tortious interference with business relationships at the pleading stage.

HOLDINGS

1. A declaratory-judgment counterclaim may be dismissed as redundant when resolution of the plaintiff's claims and the defendant's affirmative defenses would resolve all questions raised by the counterclaim and the counterclaim therefore serves no useful purpose.
2. The tortious-interference counterclaim adequately alleged a claim and was not dismissed at the pleading stage.

KEY QUOTATIONS

"Here, the Court finds that Defendants' declaratory judgment counterclaim is redundant and serves no useful purpose."

"The issues raised by Plaintiff for this claim are best addressed at summary judgment, after discovery."

FACTUAL BACKGROUND

Plaintiff Hong Kong Leyuzhen Technology Co. Limited brought a copyright infringement action concerning images. Defendants asserted a counterclaim seeking a declaration that Plaintiff lacked valid copyrights or ownership and asserted a corresponding affirmative defense. Defendants also asserted a counterclaim for tortious interference with business relationships.

PROCEDURAL HISTORY

In an underlying copyright infringement action, Defendants LaiyiVic, ZonJie, and PaladMom asserted counterclaims against Plaintiff. Plaintiff moved to dismiss both counterclaims. The court granted the motion as to the declaratory-judgment counterclaim and denied it as to the tortious-interference counterclaim.

DISPOSITION

other

CASES CITED

- Ctr. Hill Courts Condo. Ass'n, Inc. v. Rockhill Ins. Co., No. 19-cv-80111, 2019 WL 7899220, at *2 (S.D. Fla. Apr. 9, 2019)

- Medmarc Cas. Ins. Co. v. Pineiro & Byrd, PLLC, 783 F. Supp. 2d 1214, 1217 (S.D. Fla. 2011)
- U.S. ex rel. BAC Funding Consortium, Inc. v. Westchester Fire Ins. Co., No. 13-cv-22536, 2014 WL 186125, at *5 (S.D. Fla. Jan. 16, 2014)
- It's a 10, Inc. v. Beauty Elite Grp., Inc., No. 13-cv-60154, 2013 WL 4543796, at *5 (S.D. Fla. Aug. 27, 2013)

OPINION

Hong Kong Leyuzhen Technology Co. Limited v. The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule A

PER CURIAM.

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF FLORIDA

Case No.: 1:25-cv-21899-GAYLES

HONG KONG LEYUZHEN TECHNOLOGY

CO. LIMITED,

Plaintiff, v.

THE INDIVIDUALS, CORPORATIONS,

LIMITED LIABILITY COMPANIES,

PARTNERSHIPS AND UNINCORPORATED

ASSOCIATIONS IDENTIFIED IN

SCHEDULE A,

Defendants. /

ORDER

THIS CAUSE comes before the Court on Plaintiff Hong Kong Leyuzhen Technology Co. Limited's Motion to Dismiss Counterclaims (the "Motion"). [ECF No. 61]. Plaintiff moved to dismiss the counterclaims asserted by Defendants LaiyiVic, ZonJie, and PaladMom (together, "Defendants") pursuant to Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim. See generally *id.* Defendants filed a Response in Opposition to the Motion, [ECF No. 66], to which Plaintiff filed a Reply, [ECF No. 68]. The Court has considered the record, the parties' written submissions, and applicable law. For the following reasons, the Motion is GRANTED IN PART and DENIED IN PART. The Motion is GRANTED as to Count I of the Counterclaims. In Count I (Declaratory Judgment of Lack of Copyright Ownership and/or Invalidity), Defendants "seek a declaratory judgment under 28 U.S.C. § 2201" that "Plaintiff does not own valid copyrights in the images it asserts against" Defendants. [ECF No. 58, Defendants' Affirmative Defenses and Counterclaims, at 11]. And in their Ninth Affirmative Defense, Defendants assert that "Plaintiff does not own valid copyrights in the images at issue or otherwise cannot establish ownership or exclusive rights in those images." *Id.* at 8. Plaintiff contends that the "declaratory judgment counterclaim" is "duplicative of issues already before the Court in the underlying copyright infringement action, and [it] should be dismissed in the exercise of the Court's discretion under the

Declaratory Judgment Act.” [ECF No. 68, Reply at 1]. The Court agrees. Where, as here, a court is “presented with a redundant counterclaim for declaratory judgment, [the] court may either strike or dismiss the filing.” *Ctr. Hill Courts Condo. Ass'n, Inc. v. Rockhill Ins. Co.*, No. 19-cv-80111, 2019 WL 7899220, at *2 (S.D. Fla. Apr. 9, 2019). In determining “whether to dismiss” such a counterclaim “as redundant, a court must consider whether the declaratory action serves a useful purpose.” *Id.* And “to discern whether a declaratory action serves a useful purpose, courts should consider ‘whether resolution of plaintiff’s claim, along with the affirmative defenses asserted by defendant[], would resolve all questions raised by the counterclaim.’” *Id.* (quoting *Medmarc Cas. Ins. Co. v. Pineiro & Byrd, PLLC*, 783 F. Supp. 2d 1214, 1217 (S.D. Fla. 2011)). Here, the Court finds that Defendants’ declaratory judgment counterclaim is redundant and serves no useful purpose. This is because “[r]esolution of Plaintiff’s [copyright infringement] claim and Defendant[s’] [Ninth] affirmative defense[] will decide the factual and substantive issues presented by Defendant[s’] Counterclaim” for declaratory relief. *Id.* at 3; see also *U.S. ex rel. BAC Funding Consortium, Inc. v. Westchester Fire Ins. Co.*, No. 13-cv-22536, 2014 WL 186125, at *5 (S.D. Fla. Jan. 16, 2014) (finding that “the counterclaim for declaratory judgment serves no useful purpose” because “the resolution of [plaintiff’s] claims and [defendant’s] defenses thereto would resolve the questions raised in [defendant’s] counterclaim.”). The Court therefore “will exercise its discretion” and “dismiss [Defendants’ declaratory judgment] counterclaim.” /d.; see also *It's a 10, Inc. v. Beauty Elite Grp., Inc.*, No. 13-cv-60154, 2013 WL 4543796, at *5 (S.D. Fla. Aug. 27, 2013) (exercising discretion in dismissing a redundant counterclaim). The Motion is DENIED as to Count II of the Counterclaims as the Court finds that this Count adequately alleges a claim for tortious interference with business relationships. The issues raised by Plaintiff for this claim are best addressed at summary judgment, after discovery. DONE AND ORDERED in Chambers at Miami, Florida, this 21st day of April, 2026. of Bl Ae
UNITED STATES DIST JUDGE