

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Automotive Lift Institute, Inc. v. Autokato Engineering, Ltd. doing
business as Katool

Automotive Lift Institute · No. 5:25-CV-106 (FJS/TWD) · Decided February 3, 2026

SUMMARY

The court denies without prejudice Plaintiff Automotive Lift Institute, Inc.'s motion for default judgment in a copyright infringement action against Autokato Engineering, Ltd. The court finds that Plaintiff failed to submit the copyright registration certificate needed to establish ownership of a valid copyright and identifies deficiencies in the requests for actual damages, costs, attorney's fees, and prejudgment interest. Plaintiff is granted leave to renew the motion within thirty days.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Frederick J. Scullin, Jr.
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	February 3, 2026
DOCKET	5:25-CV-106 (FJS/TWD)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for entry of a default judgment in a copyright-infringement action. The Clerk had entered Defendant's default, but the Court denied the motion without prejudice and granted leave to renew.
STANDARD OF REVIEW	A default judgment lies in the sound discretion of the district court. The court accepts well-pleaded allegations as true and draws reasonable inferences in the plaintiff's favor, but must independently determine whether those allegations establish liability as a matter of law and need not accept the plaintiff's legal conclusions.
PRECEDENTIAL VALUE	unpublished district court memorandum-decision and order; persuasive rather than binding outside the case
PARTIES	Automotive Lift Institute, Inc. v. Autokato Engineering, Ltd. doing business as Katool

TOPICS

default judgment copyright infringement attorney fees prejudgment interest damages

PRACTICE AREAS

copyright civil procedure remedies commercial litigation

QUESTIONS PRESENTED

1. Whether Plaintiff established Defendant's copyright-infringement liability sufficiently to obtain a default judgment when Plaintiff identified a copyright registration number but did not submit the registration certificate.
2. Whether Plaintiff adequately supported its requests for actual damages, costs, attorney's fees, and prejudgment interest.
3. Whether the default-judgment motion should be denied without prejudice with leave to renew.

HOLDINGS

1. Plaintiff failed to establish ownership of a valid copyright because it did not submit the certificate of registration for the safety labels. Therefore, Plaintiff did not establish the first element of its copyright-infringement claim and was not entitled to default judgment.
2. A defendant's default admits well-pleaded factual allegations, but the court must still determine whether those allegations establish a valid cause of action and liability as a matter of law.
3. Any renewed request for actual damages must be supported by a reasonable, non-speculative basis for computation tied to typical market values.
4. The Court declined to award costs or attorney's fees at this stage. A renewed motion must provide documentation supporting out-of-pocket costs, contemporaneous time records, and the reasonableness of requested hourly rates.
5. The Court denied Plaintiff's request for prejudgment interest because the governing law was unresolved, Plaintiff did not address the issue, the case was not exceptional, and actual damages would provide sufficient deterrence.

KEY QUOTATIONS

"Thus, courts in the Second Circuit have established a two-step process: 'first, the entry of a default, and second, the entry of a default judgment.'" (III.A)

"However, 'a district court 'need not agree that the alleged facts constitute a valid cause of action.'" (III.A)

"To establish infringement of a copyright under the Act, a plaintiff must prove two elements: '(1) ownership of a valid copyright, and (2) copying of constituent elements of the work that are original.'" (III.B)

"'[T]he decision to grant a motion for a default judgment lies in the sound discretion of the trial court.'" (III.B)

"The Copyright Act neither allows nor prohibits an award of pre-judgment interest, and the issue of the permissibility of pre-judgment interest is unresolved in this Circuit." (III.C.5)

FACTUAL BACKGROUND

Plaintiff alleged that Defendant marketed automotive lifts bearing unauthorized copies of Plaintiff's copyrighted safety labels. Plaintiff alleged that Defendant had sold 700 lifts containing the labels and destroyed an additional 40 labels, and sought \$45,029 in actual damages, attorney's fees and costs, and prejudgment interest. Plaintiff identified a copyright registration number in the Complaint but did not submit the corresponding certificate of registration with either the Complaint or the default-judgment motion.

PROCEDURAL HISTORY

Plaintiff commenced the action on January 22, 2025. After Defendant failed to plead or otherwise defend, Plaintiff requested entry of default on March 27, 2025, and the Clerk entered default that day. Plaintiff moved for default judgment on April 28, 2025, but the Court denied the motion because Plaintiff had not submitted the copyright registration certificate or adequate documentation supporting damages, costs, and attorney's fees.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand. Plaintiff may renew the motion for default judgment within thirty days, submitting documentation establishing copyright ownership and supporting any damages, costs, and attorney's-fee requests. If Plaintiff does not renew within thirty days, the Clerk shall close the case for failure to prosecute without further order.

CASES CITED

- City of N.Y. v. Mickalis Pawn Shop, LLC, 645 F.3d 114, 128, 137 (2d Cir. 2011)
- New York v. Green, 420 F.3d 99, 104 (2d Cir. 2005)
- Pasatieri v. Starline Prods., Inc., No. 18-CV-4688 (PKC) (VMS), 2020 WL 207352, at *1, *5 (E.D.N.Y. Jan. 14, 2020)
- Vt. Teddy Bear Co., Inc. v. 1-800 Beargram Co., 373 F.3d 241, 246 (2d Cir. 2004)
- United States v. DiPaolo, 466 F. Supp. 2d 476, 482 (S.D.N.Y. 2006)
- O'Callaghan v. Sifre, 242 F.R.D. 69, 73 (S.D.N.Y. 2007)
- Shah v. New York State Dep't of Civil Serv., 168 F.3d 610, 615 (2d Cir. 1999)
- Finkel v. Romanowicz, 577 F.3d 79, 84 (2d Cir. 2009)
- Au Bon Pain Corp. v. Arctect, Inc., 653 F.2d 61, 65 (2d Cir. 1981)
- BWP Media USA Inc. v. Polyvore, Inc., 922 F.3d 42, 61 (2d Cir. 2019)
- Feist Publications, Inc. v. Rural Telephone Service Co., 499 U.S. 340, 345, 361, 111 S. Ct. 1282, 113 L. Ed. 2d 358 (1991)

- Sheldon v. Plot Commerce, No. 15 CV 5885 (CBA) (CLP), 2016 WL 5107072, at *11, *14 (E.D.N.Y. Aug. 26, 2016)
- Gym Door Repairs, Inc. v. Young Equip. Sales, Inc., 206 F. Supp. 3d 869, 896 (S.D.N.Y. 2016)
- Weissmann v. Freeman, 868 F.2d 1313, 1321 (2d Cir. 1989)
- On Davis v. The Gap, Inc., 246 F.3d 152, 159 (2d Cir. 2001)
- Antenna Television, A.E. v. Aegean Video Inc., No. 95-CV-2328 ERK, 1996 WL 298252, at *3 (E.D.N.Y. Apr. 16, 1996)
- Renna v. Queens Ledger/Greenpoint Star Inc., No. 17-CV-3378 (DRH) (SIL), 2019 WL 1061259, at *4 (E.D.N.Y. Feb. 13, 2019)
- Barrera v. Brooklyn Music, Ltd., 346 F. Supp. 2d 400, 404-05 (S.D.N.Y. 2004)
- Barsch v. Modern Boss Mktg. LLC, No. 1:24-CV-820 (AMN/DJS), 2025 WL 1424254, at *6 (N.D.N.Y. May 16, 2025)
- Stokes v. ???, 681 F. Supp. 3d 243-44
- Mango v. ???, 356 F. Supp. 3d 379
- Healey v. Leavitt, 485 F.3d 63, 71 (2d Cir. 2007)
- Millea v. Metro-North Railroad Co., 658 F.3d 154, 166 (2d Cir. 2011)
- Hart v. Kitchen Infinity, Inc., No. 24-CV-05031 (JMA) (AYS), 2025 WL 2576675, at *5 (E.D.N.Y. Sept. 5, 2025)
- Capitol Recs., Inc. v. MP3tunes, LLC, No. 07-CV-09931, 2015 WL 13684546, at *4 (S.D.N.Y. Apr. 3, 2015)