IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

HONG KONG LEYUZHEN TECHNOLOGY CO., LTD.,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE "A" HERETO,

Defendants.

Case No. 1:24-CV-02939-MFK-BWJ

Honorable Matthew F. Kennelly

Magistrate Beth W. Jantz

REPLY MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF'S REVISED MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION

Plaintiff Hong Kong Leyuzhen Technology Co., Ltd. ("Plaintiff") submits this Reply Memorandum of Law in support of its Revised Motion for Entry of a Preliminary Injunction (the "Reply").

The Reply is supported by the pleadings and papers on file in this action, the Supplemental Declaration of Shawn A. Mangano, Esq. (the "Supp. Mangano Decl."), the Declaration of Joseph W. Droter, Esq. (the "Droter Decl."), the Declaration of Lilly P. O'Dea (the "O'Dea Declaration"), the Supplemental Declaration of Liangjie Li (the "Supp. Li Decl."), together with the arguments set forth herein and any oral argument by counsel entertained by the Court at the hearing set on this matter.

I. <u>INTRODUCTION</u>

During the May 22, 2024 telephonic hearing in this action, the Court raised two specific issues that it wanted Plaintiff to address in seeking entry of a preliminary injunction: (1) whether the Court to exercise specific personal jurisdiction over the appearing Defendants based on their unauthorized use of copyright protected images on Amazon.com ("Amazon") storefronts selling counterfeit Rotita brand products; and (2) whether Plaintiff was prepared to thoroughly examine and reduce the amounts currently being restrained in Defendants' online stores by Amazon to an amount reasonably related to the company's entitlement to equitable relief through the disgorgement of profits. This Reply seeks to address these concerns directly and succinctly.

Turning first to its concerns over whether personal jurisdiction could be properly exercised over the appearing Defendants, the Court specifically mentioned that many Schedule "A" Defendants often place orders for counterfeit or infringing goods so that there is evidence of purposeful availment to the jurisdiction. Plaintiff has heeded the Court's advice and undertook an investigation into online Amazon storefronts using registered copyright protected images and currently unregistered copyright protected images to promote the sale of counterfeit Rotita products. (Supp. Li Decl. ¶ 9, Ex. 1; Droter Decl. ¶ 4-20.) This cursory investigation has resulted ten (10) represented Defendants operating online Amazon storefronts displaying unauthorized images owned by Plaintiff and protected by, at least, six (6) individual federal copyright registrations. (Id.; Droter Decl. ¶ 4-13, 17.) In addition, six (6) more represented Defendants were discovered to be displaying misappropriated, unregistered copyrighted protected images on their Amazon.com online storefronts to advertise the sale of counterfeit Rotita products. (Id.; Droter Decl. ¶ 4-6, 12, 15-20.) Plaintiff has compiled a summary of these federally registered copyright protected images, their corresponding registration numbers, links to the represented Defendants'

Amazon storefronts displaying these images without authorization, the actual images displayed without authorization, and similar information for the unregistered copyright protected works. (Supp. Li Decl. ¶ 9, Ex. 1.)

After discovering that some sixteen (16) represented Defendants contesting the Court's authority to exercise personal jurisdiction over them and asserting that they had engaged in absolutely no sales to residents of the State of Illinois, Plaintiff used a third party to place multiple orders for counterfeit products using the company's federally registered copyright protected images and unregistered copyright protected images for shipment to Chicago, Illinois. (O'Dea Decl. ¶¶ 4-11; Droter Decl. ¶¶ 4-31.) Each of these purchases, which requested shipment to Chicago, Illinois, resulted in sales confirmation that were captured through screenshots. (*Id.* ¶ 12, Ex. A; Droter Decl. ¶¶ 4, 30, Ex. B.) Moreover, several of these purchases have been shipped and are currently in transit to Chicago, Illinois. (*Id.* ¶ 13, Ex. B; Droter Decl. ¶¶ 31, Ex. C.) In fact, as of the filing of this Reply, at least one counterfeit product offered for sale by a represented Defendant using Rotita's copyright protected images was delivered to Chicago, Illinois. (*Id.* ¶ 14, Ex. C; Droter Decl. ¶¶ 32, Ex. D.)

As such, this Court now has affirmative proof before it that the represented Defendants have engaged in, and continue to engage in, the direct unauthorized copying of Plaintiff's copyright protected images in offering for sale counterfeit Rotita products that can – and now have – been shipped to and received in this judicial district. Under these circumstances, it simply cannot and should not be determined that specific personal jurisdiction cannot be exercised over the represented Defendants. Such a finding would only serve to sanction their ongoing, highly sophisticated counterfeit operation at the expense of Plaintiff's significant intellectual property rights for which it has paid handsomely to secure.

Turning next to the Court's directive to meaningfully evaluate and reduce the amount of funds currently being restrained by Amazon for each appearing Defendant at the May 22, 2024 telephonic hearing. Plaintiff and its counsel have worked diligently to identify potential, eligible United States sales by the represented Defendants, determine a reasonable net profit rate for those sales, apply that amount to the sums restrained by Amazon, and seek the release of any amount in excess. (Supp. Li Decl. ¶¶ 11-12; Supp. Mangano Decl. ¶ 12, Ex. 1.) In doing so, Plaintiff has identified a 40% net profit rate to be reasonable – particularly given that the represented Defendants use misappropriated advertising images for which Plaintiff is required to pay and given that they also employ the use of the term "Rotita" in their Search Engine Optimization ("SEO") parameters with Amazon to improperly drive consumer traffic to their counterfeit product storefronts. (Supp. Li. Decl. ¶ 12.) Plaintiff's counsel has communicated with Defendants' counsel and relayed the decision to release all amounts restrained by Amazon that do not reasonably support an equitable disgorgement of profits based on the estimated sales figures currently known.¹ (Supp. Mangano Decl. ¶¶ 13-16.) To the extent any other represented Defendants have not been engaged for this discussion, Plaintiff and its counsel are ready and willing to do so. (*Id.* ¶ 18.)

II. <u>ARGUMENT</u>

a. Defendants Are Subject to Specific Personal Jurisdiction.

The answer to this threshold question is crystal clear. The represented Defendants are subject to specific personal jurisdiction.

It is without question that specific personal jurisdiction may properly be exercised over a defendant that has engaged in an online presence, directed to the forum state, that results in order

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¹ One exception to this statement is that Plaintiff's counsel and counsel for the Defendants represented by Michael Adams are negotiating a stipulation to reduce the amounts restrained by Amazon for each of his three clients to \$100,000 per. (Supp. Mangano Decl. ¶ 17.)

and shipment confirmations. *Curry v. Revolution Laboratories, LLC*, 949 F.3d 385, 399 (7th Cir. 2020) (online order and shipping confirmations sufficient for specific jurisdiction). Moreover, even receipt of a single, counterfeit or infringing product in the forum state is sufficient for the exercise of specific personal jurisdiction. *See NBA Properties, Inc. v. HANWJH*, 46 F.4th 614, 624 (7th Cir. 2022).

Here, a vast majority of the represented Defendants have asserted they have made absolutely no sales in the State of Illinois, nor have they adequately targeted the jurisdiction sufficient for specific jurisdiction to be exercised over them. Plaintiff's independent investigation, which could have been more extensive given additional time, revealed that ten (10) of the Represented Defendants were operating additional stores on Amazon.com that used, at least, misappropriated copyright protected images that infringe six (6) federally registered copyrights in connection with the sale of counterfeit Rotita brand products. (Supp. Li Decl. ¶ 9.) Additionally, six (6) more of the Represented Defendants were displaying misappropriated, unregistered copyrighted protected images on their Amazon.com online storefronts to advertise the sale of counterfeit Rotita products. (Id.) In sum, Plaintiff has identified the exact same counterfeit operations alleged to have been operating in this case currently operating elsewhere through storefronts maintained by numerous represented Defendants on the Amazon platform.

Not only has Plaintiff identified these parallel, identical, counterfeit sales operations using its copyright protected images as bait for unsuspecting consumers, it has, through a third-party, placed orders for these counterfeit products, received order confirmations in response, been provided access to shipping updates, and has physically received at least one counterfeit product in Chicago, Illinois. (O'Dea Decl. ¶¶ 12-14, Exs. A-C; Droter Decl. ¶¶ 30-32, Exs. B-D.) Given additional time, Plaintiff is confident that it could supply the Court with even more counterfeit

Rotita products received from the represented Defendants' Amazon storefronts once they arrive at their destination in Chicago, Illinois.

In addition to the foregoing facts, the Court is reminded that the Defendants are alleged to be engaged in a highly sophisticated, counterfeit operation in which they are acting in concert and obtaining finished, source products from at least one common supplier. (Supp. Mangano Decl. ¶ 5; Supp, Li Decl. ¶ 7.) Under this scenario, specific personal jurisdiction exercised against one Defendant should be imputed against all Defendants. *See Textor v. Board of Regents of Northern Illinois University*, 711 F.3d 1387, 1392-93 (7th Cir. 1983). To the extent the Court requires Plaintiff to more sufficiently plead these allegations to sustain specific personal jurisdiction on this basis, if deemed necessary, it for entry of the requested injunctive relief subject to doing so. Such relief would preserve the viable basis for Plaintiff's entitlement to injunctive relief while merely conforming the pleadings before the Court to conform with the evidence already presented.

In short, existing caselaw from the Seventh Circuit and from this district supports the exercise of specific personal jurisdiction over Defendants on the record presented. To the extent the Court is somehow unconvinced given the record before it, Plaintiff asks that its request for entry of preliminary injunctive relief be granted while it engages in jurisdictional discovery. To this end, Plaintiff has already made a *prima facie* showing that specific jurisdiction should be exercised over multiple represented and appearing Defendants. *See Central States Pension Fund v. Reimer Express World Corp.*, 230 F.3d 934, 946 (7th Cir. 2000). In this regard, Plaintiff has already requested, and Amazon is already processing, its request for specific sales information related to the State of Illinois that was not provided by the platform in its original responses to the company's expedited discovery. (Supp. Mangano Decl. ¶ 10.) In addition, Plaintiff has set forth other, specifically targeted discovery efforts related to jurisdictional issues with this submission.

(*Id.* ¶ 11.) Accordingly, Plaintiff respectfully requests the Court find that it may properly exercise specific personal jurisdiction over the represented Defendants on the record presented or, alternatively, enter the requested injunctive relief for an interim period while Plaintiff engages in jurisdictional discovery.

b. Plaintiff has Agreed to a Reasonable Release of Restrained Funds, Thereby

Further Tipping the Balance of Hardships in Its Favor.

At the May 22, 2024 telephonic hearing, the Court expressed some doubt as to whether the balance of the hardships would sufficiently tip in favor of the Plaintiff in the event funds in excess of any potential equitable disgorgement of profits were restrained. In view of these concerns, the Court directed Plaintiff to meaningfully examine the amounts restrained by Amazon. Plaintiff has heeded the Court's advice and has taken appropriate action.

Specifically, Plaintiff and its counsel have worked to identify a reasonable net profit rate that should be applied to any United States sales by the represented Defendants given the company's net profit rate and advertising expenses, which would likely not apply to Defendants given their use of misappropriated images and the unauthorized incorporation of Plaintiff's "Rotita" brand in their SEO parameters. (Supp. Li Decl. ¶ 12; Supp. Mangano Decl. ¶ 12.) This resulted in Plaintiff identifying a 40% net profit rate for Defendants' accused United States sales. (Supp. Li Decl. ¶ 12.) These accused United States sales, which have been compiled by Plaintiff's use of two proprietary software programs, have been conveyed to its counsel. (Id. ¶¶ 11-12.) Counsel used these accused United States sales figures and applied the selected reasonable net profit rate for an equitable disgorgement analysis. (Supp. Mangano Decl. ¶ 12.) If the resulting equitable disgorgement amount exceeded the amount restrained by Amazon, counsel for the Defendant(s) appearing at the May 22, 2024 was advised of the release that would be submitted to

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the platform. (Supp. Mangano Decl. ¶ 12-17, Exs. 2-4.) If the disgorgement amount did not exceed

the restrained amount, no release would be sought from Amazon. (Id. ¶ 12.) The calculations

employed in this analysis have been submitted with this Reply. (Id., Ex. 1.) Moreover, Plaintiff

remains ready, willing, and able to apply the same analysis to any represented Defendant that it

may have inadvertently overlooked. (*Id.* ¶ 18.)

Given the foregoing, Plaintiff submits that it has fully and reasonably addressed the Court's

concerns over maintaining asset restrains that exceed the company's potential equitable recovery

under a disgorgement of profits analysis. That said, Plaintiff is in the process of communicating

with Amazon to facilitate the release of restrained funds and may require a further Order of the

Court to effectuate this action based on the platform's requirements. Accordingly, and in view of

Plaintiff's actions and representations, the company asserts that the balance of the hardship tips

decidedly in its favor, which supports the creation of copyright protected content and the

enforcement of such rights.

III. **CONCLUSION**

For the foregoing reasons, Plaintiff respectfully requests the Court grant its request for

entry of a preliminary injunction and maintain the current bond amount required under the TRO,

together with issuing any other relief that it deems just and proper.

DATED: June 4, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Bar No. 6299408)

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Attorneys for Plaintiff

REPLY IN SUPPORT OF REVISED MOTION FOR

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of June 2024, I electronically filed the foregoing

document with the clerk of the court for the U.S. District Court, Northern District of Illinois,

Eastern Division, using the electronic case filing system. The electronic case filing system sent a

"Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept

this Notice as service of this document by electronic means. Notice of this filing is provided to

unrepresented parties for whom contact information has been provided via email and by posting

the filing on a URL contained on our website https://blointernetenforcement.com/, and distributed

to ecommerce platform, Amazon.

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Bar No. 6299408)

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Attorneys for Plaintiff

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Defendants.

Case No. 1:24-CV-02939-MFK-BWJ

Honorable Matthew F. Kennelly

Magistrate Beth W. Jantz

SUPPLEMENTAL DECLARATION OF SHAWN A. MANGANO, ESQ. IN SUPPORT OF PLAINTIFF'S REVISED MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION

- I, Shawn A. Mangano, of the City of Las Vegas, in the State of Nevada, declare as follows:
- 1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.
- 2. I make this declaration in support of Plaintiff's Reply in. Support of Motion for Entry of a Preliminary Injunction (the "Reply").
- 3. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff's estimated gross revenue from United States sales likely exceeds \$20,000,000 USD per year. Of this amount, Plaintiff estimates that over \$1,000,000 is derived from sales in the State of Illinois. Moreover, Plaintiff spends anywhere from \$8,000,000 to \$12,000,000 USD each year to specifically advertise its Rotita brand in the United States through such online advertising sources as Google Ads, Facebook, and Bing. Furthermore, the company has spent more than \$80,000 in filing fees paid to the United States Copyright Office just to secure registration of copyright protected works being asserted in eleven (11) enforcement actions initiated in this judicial district. Simply put, Plaintiff is an extremely successful company that earns millions of dollars from product sales in the United States – including within the State of Illinois. To do so, Plaintiff annually spends tens of millions of dollars advertising in the United States to promote the sale of its brand.

5. Plaintiff's operative Complaint in this action is but one piece in a multi-action copyright enforcement campaign that seeks to dismantle a criminal network that operates through six (6) of the largest online retail platforms in existence and includes over 2,500 named Schedule "A" Defendants. These named Schedule "A" Defendants are alleged to be engaged in the practice of copying Plaintiff's copyright protected product images almost instantaneously after they are first displayed on the company's website and then associating these images with sale and promotion of unauthorized, counterfeit products of substandard quality, thereby deceiving consumers – including the citizens of the State of Illinois. Moreover, given the nature of Plaintiff's goods, such large-scale sales operations over multiple online retail platforms require considerable supply chain coordination that could not reasonably be accomplished independently by any of the named Defendants. Accordingly, Defendants are alleged to be operating in concert as part of a large-scale counterfeit operation based in the People's Republic of China.

6. The appearing Defendants in this action argue that the Court cannot reasonably exercise personal jurisdiction over them because they have not engaged in any infringing sales within the State of Illinois. This argument has been raised by those blocks of Defendants represented by Shengmao Mu (the "Mu Defendants"), those represented by Adam Urbanczyk (the "AU Defendants"), and those represented by Benjamin Solter (the "Solter Defendants" and collectively referred to as the "Represented Defendants") in this action. Only the Mu Defendants (Dkt. No. 66) and AU Defendants (Dkt. No. 55) have filed oppositions to Plaintiff's Motion for Preliminary Injunction.

- 7. Defendants have directly targeted their counterfeit sales activities, through online sales platforms not utilized by Plaintiff, in the United States, including to the residents of the State of Illinois, through, at least, fully interactive, e-commerce stores operating under their designated aliases on the Amazon platform.
- 8. Specifically, Defendants have targeted online sales to Illinois residents by setting up, maintaining, and operating Amazon-based e-commerce stores using their seller aliases that target United States consumers, including residents of the State of Illinois, whereby these targeted sales individuals can purchase counterfeit Rotita brand products.
- 9. As set forth in the Supplemental Declaration of Liangjie Li submitted in support of Plaintiff's Reply, Plaintiff performed a cursory investigation for any additional counterfeit products being offered for sale on the Amazon.com platform by any of the Represented Defendants. Plaintiff's investigation revealed that ten (10) of the Represented Defendants were operating additional stores on Amazon.com that used, at least, misappropriated copyright protected images that infringe six (6) federally registered copyrights in connection with the sale of counterfeit Rotita brand products. The six (6) federally registered copyright registrations are: (1)

VA0002384828; (2) VA0002379888; (3) VA0002379895; (4) VA0002384827; (5) VA0002379893; and (6) VA0002379911. In addition, six (6) more of the Represented Defendants were displaying misappropriated, unregistered copyrighted protected images on their Amazon.com online storefronts to advertise the sale of counterfeit Rotita products. Counterfeit Rotita products from these Represented Defendants' online Amazon storefronts, including those displaying federally registered copyright protected images without authorization, were ordered from Chicago, Illinois, for shipment to Chicago, Illinois. Moreover, purchase confirmations and shipping confirmations have been provided by the Represented Defendants' online storefronts maintained on Amazon.com. Finally, at least one counterfeit product has been physically delivered to Chicago, Illinois as of the filing of this supplemental declaration.

- 10. Plaintiff has requested Amazon.com provide specific Illinois sales data for the ASINs associated with the Represented Defendants' online storefronts. Amazon is in the process of compiling this specific data. Amazon has not provided a date when its data compilation is expected to be completed.
- 11. To the extent the Court determines that jurisdictional discovery is necessary at this stage of the proceedings, Plaintiff would expect to receive the requested Illinois-specific sales data for the ASINs associated with the Represented Defendants' online storefronts, it would expect to subpoena any third-party data services responsible for tracking the Represented Defendants' online sales and reviews to identify any sales made in the State of Illinois, it would expect to send out written discovery requests to the Represented Defendants on jurisdictional discovery topics, and it may elect to depose principals associated with, at least, the major identified sellers of counterfeit products on jurisdictional issue that are represented by counsel in this action.

12. Plaintiff has provided me with a list of United States product sales by the Represented Defendants and all other Defendants that, to the best of my recollection, appeared at the last hearing in this matter. I have compiled a chart that summarizes each Defendant block by their counsel. The chart next includes the identified United States sales made by each Defendant, the amount of funds frozen by Amazon.com, and an estimated equitable disgorgement of profits from each Defendant based on the 40% net profit margin identified by Plaintiff's Chief Operating Officer in his supporting declaration. (Supp. Li Decl. ¶ 12.) I have then included this disgorgement of profits estimate in a separate column. If the amount frozen by Amazon.com exceeded the disgorgement of profits estimate, the difference has been targeted for release by the platform. If the amount frozen by Amazon.com was less than the disgorgement of profits estimate, then a release of funds is not appropriate. Attached as Exhibit "1" is a true and correct copy of my Amazon fund release analysis spreadsheet created for this action.

- 13. I have attempted to negotiate the release of funds per the Court's directive at the last telephonic hearing in this matter. To the best of my knowledge, I have contacted counsel for the Represented Defendants and all other Defendants appearing at that hearing
- 14. I have advised counsel for the Mu Defendants the amounts being targeted for release for each qualifying Defendant via email on June 3, 2024. Attached as Exhibit "2" is a true and correct copy of my June 3, 2024 email to counsel for the Mu Defendants.
- 15. I have advised counsel for the Solter Defendants the amounts being targeted for release for each qualifying Defendant via email on June 3, 2024. Attached as Exhibit "3" is a true and correct copy of my June 3, 2024 email to counsel for the Solter Defendants.

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16. I have advised counsel for the AU Defendants the amounts being targeted for

release for each qualifying Defendant via email on June 3, 2024. Attached as Exhibit "4" is a true

and correct copy of my June 3, 2024 email to counsel for the AU Defendants.

17. In addition, I have exchanged emails with Michael Adams, Esq. concerning the

release of funds frozen by Amazon.com for his three clients. At this time, we are negotiating a

stipulated resolution whereby funds in the amount of \$100,000 per Defendant would be frozen.

18. Plaintiff remains ready, will, and able to employ the same analysis in seeking the

release of funds currently frozen by Amazon.com for any other represented Defendant in this

action that contacts counsel.

I declare under penalty of perjury under the laws of the United States of America the

foregoing is true and correct.

Executed on June 4, 2024, in Las Vegas, Nevada.

By: /s/ Shawn A. Mangano

SHAWN A. MANGANO, ESQ.

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of June 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email posting filing URL contained website and by the on on our https://blointernetenforcement.com/, and distributed to ecommerce platform, Amazon.

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Bar No. 6299408) **BAYRAMOGLU LAW OFFICES LLC** 1540 West Warm Springs Road Ste. 100 Henderson, NV 89014

Tel: (702) 462-5973 Fax: (702) 553-3404 shawnmangano@bayramoglu-legal.com *Attorneys for Plaintiff*

EXHIBIT 1

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Attorney	Defendant	US Sales	Amount Frozen	Units Sold	40%	Amount to Release
Shengmao Mu Whitewood Law PLLC 111 W. Jackson Blvd. Ste 1700 Chicago, IL 60604 917-858-8018 smu@whitewoodlaw.com	FANDEE	\$303,568.00	\$26,718.82	8,135	\$121,427.20	
	Runwind	\$62,854.00	\$108,200.25	1,727	\$25,141.60	\$83,058.65
	Nmoder	\$150,309.00	\$143,026.28	405	\$60,123.60	\$82,902.68
	JTNFairy	\$3,398.00	\$61,893.61	103	\$1,359.20	\$60,534.41
	LightlyKiss	\$64,963.00	\$70,884.93	2,027	\$25,985.20	\$44,899.73
	TDiooCor	\$4,751.00	\$27,878.70	17	\$1,900.40	\$25,978.30
Keaton David Smith Whitewood Law Pllc 57 W 57th Street 3 rd /4th Fl. Manhattan, NY 10019 (917) 858-8018	LaiyiVic	\$334,116.45	\$66,485.22	101,857	\$133,646.58	
	Glozeplus	\$711,258.59	\$33,753.99	27,854	\$284,503.44	
	MsavigVice	\$8,687,599.14	\$27,530.34	238,975	\$3,475,039.66	
ksmith@whitewoodlaw.com	Sexycherry	\$1,318,968.25	\$125,026.97	45,365	\$527,587.30	
	SeNight	\$665,194.02	\$82,875.79	21,498	\$266,077.61	
	SxClub	\$205,577.62	\$131,070.93	6,476	\$82,231.05	\$48,839.88
	Yiershu	\$152,904.00	\$35,814.35	4,881	\$61,161.60	
	VisiChenup	\$172,414.41	\$35,313.12	5,567	\$68,965.76	
	PaladMom	\$86,720.00	\$51,465.64	2,986	\$34,688.00	\$16,777.64
	PerZeal PerZeal	\$136,599.00	\$120,747.88	3,916	\$54,639.60	\$66,108.28
	LalaLin	\$972,508.60	\$174,257.82	26,653	\$389,003.44	
	Yajedo	\$818,486.00	\$131,946.40	852	\$327,394.40	
	Angerella Fashion	\$9,505,522.00	\$38,716.10	314,662	\$3,802,208.80	

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Attorney	Defendant	US Sales	Amount Frozen	Units Sold	40%	Amount to Release
Benjamin Solter Solter Ip Law, LLC 421 W Huron St Apt 801 Chicago, IL 60654 (781) 752-6369 bsolter@solteriplaw.com	TieBnss	\$139,185.94	\$7,050.43	4,252	\$55,674.38	
	IbuduSexy	\$1,197,204.08	\$23,909.18	40,598	\$478,881.63	
	Oxgmoky	\$408,121.77	\$11,238.57	12,499	\$163,248.71	
	MOJICK	\$254,702.64	\$15,755.73	7,426	\$101,881.06	
	Bttup	\$1,125,799.83	\$20,167.10	36,156	\$450,319.93	
	DinyIn	\$219,106.00	\$25,386.06	5,443	\$87,642.40	
	HugeNice	\$335,991.36	\$20,563.07	10,949	\$134,396.54	
	Knoint	\$32,937.00	\$14,114.81	1,092	\$13,174.80	\$940.01
	ZonJie	\$53,126.00	\$10,658.94	1,554	\$21,250.40	
	SheKiss	\$94,258.57	\$5,363.13	3,143	\$37,703.43	
			1			1
Adam Edward Urbanczyk	ANHEUM	\$161.26	\$137,117.78	11	\$64.50	\$137,053.28
Au LLC 444 W. Lake St., 17th Floor Chicago, IL 60606 312-715-7312	StunningQueen	\$0	\$5,423.08	0	\$0.00	\$5,423.08
	ADHOWBEW	\$27.78	\$2,062.06	1	\$11.11	\$2,050.95
adamu@au-llc.com						

Attorney	Defendant	US Sales	Amount Frozen	Units Sold	40%	Amount to Release
	Aojingyibin	\$0	\$208.01	0	\$0.00	\$208.01
	BTLYUIOAPE	\$0	\$13,735.51	0	\$0.00	\$13,735.51
	Febecool	\$0	\$4,201.07	0	\$0.00	\$4,201.07
	FQZWONG	\$18.51	\$26,818.66	1	\$7.40	\$26,811.26
	Goddess Accent 15-18 Days Delivery	\$0	\$1,294.82		\$0.00	\$1,294.82
	Hjgjhgf	\$28.42	\$70,450.20	1	\$11.37	\$70,438.83
	Holiday Deals-7-15 Days Delivery-Ruisiqi Trading	\$0	\$2,336.16	0	\$0.00	\$2,336.16
	uebc_NHF	\$0	\$555.15	0	\$0.00	\$555.15
	Kenvina	\$0	\$4,226.61	0	\$0.00	\$4,226.61
	lcyhony 2023 Black Friday Deals-7-20 Days Delivery	\$0	\$422.80	0	\$0.00	\$422.80
	MABUTINGTI	\$0	\$46,505.87	0	\$0.00	\$46,505.87
	Tang jian	\$0	\$2,911.59	0	\$0.00	\$2,911.59
	Tantisy Easter Day Big Promotion	\$0	\$1,728.11	0	\$0.00	\$1,728.11
	Taymeis women's store	\$0	\$832.62	0	\$0.00	\$832.62
	Yantihe	\$0	\$7,170.28	0	\$0.00	\$7,170.28
	ZWSPTO-US	\$0	\$4,210.99	0	\$0.00	\$4,210.99
	ZXTC	\$0	\$1,680.99	0	\$0.00	\$1,680.99
	HPJKLYTR Lightning Deals of Today	\$0	\$23,183.70	0	\$0.00	\$23,183.70

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Attorney	Defendant	US Sales	Amount Frozen	Units Sold	40%	Amount to Release
Michael P. Adams	FLOERNS STORE	\$72,851.00	\$1,254,694.50	1793	\$29,140.40	\$1,225,554.10
Dykema Gossett PLLC 111 Congress Ave. Ste 1800	VERDUSA STORE	\$5,477.00	\$1,860.13	22	\$2,190.80	
Austin, TX 78701	SWEATYROCKS STORE	\$3,846.00	\$586,094.49	156	\$1,538.40	\$584,556.09
		•				

EXHIBIT 2

Rotita/Amazon - Case No. 1:24-cv-02939 (Judge Kennelly) - Release Amazon Fund Summary

Shawn Mangano <Shawnmangano@bayramoglu-legal.com>

Mon 6/3/2024 2:02 PM

To:Shengmao Mu <smu@whitewoodlaw.com>

Cc:Keaton Smith <ksmith@whitewoodlaw.com>;Litigation <litigation@bayramoglu-legal.com>

Sam:

Based on our internal sales analysis, we are prepared to release the following funds currently frozen in your clients' Amazon seller accounts:

- 1. Runwind = \$83,058.65 to be released leaving \$25,141.60 restrained;
- 2. Nmoder = \$82,902.68 to be released leaving \$60,123.60 restrained;
- 3. JTNFairy = \$60,534.41 to be released leaving \$1,359.20 restrained;
- 4. LightlyKiss = \$44,899.73 to be released leaving \$25,985.20 restrained;
- 5. TDiooCor = \$25,978.30 to be released leaving \$1,900.40 restrained;
- SxClub = \$48,839.88 to be released leaving \$82,231.05 restrained;
- 7. PaladMom = \$16,777.64 to be released leaving \$34,688.00 restrained; and
- 8. PerZeal = \$66,108.28 to be released leaving \$54,639.60 restrained.

The above decisions to release frozen funds has been made based upon an estimated net profit subject to disgorgement of between 30% and 50% based on our client's estimated net profit figures that includes significant advertising expenses that your clients do not have. All other restrained funds in this action do not exceed the potential disgorgement of profits based on a 40% net profit analysis.

Regards,

S





Admissions: Nevada & California

1540 West Warm Springs Road, Suite 100, Henderson, NV 89014 (702) 462–5973 www.bayramoglu-legal.com EVERY PERSON WHO WALKS THROUGH OUR DOOR IS IMPORTANT TO US

EXHIBIT 3

Rotita/Amazon - 1:24-cv-02939 (Judge Kennelly) - Release of Amazon Funds

Shawn Mangano <Shawnmangano@bayramoglu-legal.com>

Mon 6/3/2024 2:10 PM

To:bsolter@solteriplaw.com <bsolter@solteriplaw.com>

Cc:Litigation < litigation@bayramoglu-legal.com>;Heather lkerd < Heather@bayramoglu-legal.com>

Ben:

Based on our internal sales analysis, we are prepared to release the following funds currently frozen in your clients' Amazon seller accounts:

Knoint = \$ 940.01 to be released leaving \$13,174.80 restrained;

The above decisions to release frozen funds has been made based upon an estimated net profit subject to disgorgement of between 30% and 50% based on our client's estimated net profit figures that includes significant advertising expenses that your clients do not have. All other restrained funds in this action do not exceed the potential disgorgement of profits based on a 40% net profit analysis.

Regards,

S





Admissions: Nevada & California

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EXHIBIT 4

Rotita/Amazon - 1:24-cv-02939 (Judge Kennelly) - Release of Amazon Funds

Shawn Mangano <Shawnmangano@bayramoglu-legal.com>

Mon 6/3/2024 2:46 PM

To:Adam E. Urbanczyk <adamu@au-llc.com>

Cc:Litigation Litigation@bayramoglu-legal.com; Frank Niu <niu@mainleaf-law.com>

Adam:

Per our conversation, I am going to ask that Amazon release all restrained funds currently held by it. This decision is based on our current sales figures from the single ASIN identified with Amazon for which they have provided sales data. T

his decision does not, however, concede that no infringing sales have been made by these clients - only that the currently identified sales associated with this single ASIN, which is likely associated with an undesirable product size (such as XS or XXS), does not show corresponding sales sufficient to justify restraining the funds currently held. This decision also does not in any waive our client's right to seek a disgorgement of profits from these defendants or to recover on a lost profits damage theory.

As also stated in our telephone conversation, we are open to pursuing global settlements with the clients represented by your firm in this case and in the other pending cases. I hope we can work together to solve our client's claim against these defendants and the other defendants represented by your firm.

Regards,

S



Bayramoglu Law

Admissions: Nevada & California

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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE "A" HERETO,

Defendants.

Case No.: 1:24-cv-02939-MFR-BWJ

Honorable Mathew F. Kennelly

Magistrate Beth W. Jantz

<u>DECLARATION OF JOSEPH W. DROTER, ESQ. IN SUPPORT OF MOTION TO ENTER PRELIMINARY INJUNCTION</u>

I, Joseph W. Droter, Esq., of the City of Chicago, in the State of Illinois, declare as follows:

- 1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.
- 2. I make this declaration in support of Plaintiff's Reply in Support of Motion for Preliminary Injunction.
- 3. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

- 4. As set forth in the Supplemental Declaration of Liangije Li submitted in support of Plaintiff's Reply, Plaintiff performed a cursory investigation for any additional counterfeit products being offered for sale on the Amazon.com platform by any of the Represented Defendants. Plaintiff's investigation revealed that ten (10) of the Represented Defendants were operating additional stores on Amazon.com that used, at least, misappropriated copyright protected images that infringe six (6) federally registered copyrights in connection with the sale of counterfeit Rotita brand products. The six (6) federally registered copyright registrations are: (1) VA0002384828; (2) VA0002379888; (3) VA0002379895; (4) VA0002384827; (5) VA0002379893; and (6) VA0002379911. In addition, six (6) more of the Represented Defendants were displaying misappropriated, unregistered copyrighted protected images on their Amazon.com online storefronts to advertise the sale of counterfeit Rotita products. Counterfeit Rotita products from these Represented Defendants' online Amazon storefronts, including those displaying federally registered copyright protected images without authorization, were ordered from Chicago, Illinois, for shipment to Chicago, Illinois. Moreover, purchase confirmations and shipping confirmations have been provided by the Represented Defendants' online storefronts maintained on Amazon.com. Finally, at least one counterfeit product has been physically delivered to Chicago, Illinois as of the filing of this supplemental declaration.
- 5. Defendant JTN Fairy has used the federally registered copyright image protected by VA0002384828 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois. This same Defendant has used another Rotita owned unregistered copyright protected image without authorization in the sale of two counterfeit products being shipped to Chicago, Illinois.

- 6. Defendant PaladMom has used the federally registered copyright image protected by VA0002379888 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois. This same Defendant has used another Rotita owned unregistered copyright protected image without authorization in the sale of one other counterfeit product being shipped to Chicago, Illinois.
- 7. Defendant FQZWONG has used the federally registered copyright image protected by VA0002379895 without authorization in the sale of two (2) counterfeit products being shipped to Chicago, Illinois. Defendant FQZWONG has used the federally registered copyright image protected by VA0002379893 without authorization in the sale of another counterfeit product being shipped to Chicago, Illinois.
- 8. Defendant Febecool has used the federally registered copyright image protected by VA0002379895 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.
- 9. Defendant Tan jian has used the federally registered copyright image protected by VA0002379895 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.
- 10. Defendant Shusuen Tantisy ★Easter Day Big Promotion has used the federally registered copyright image protected by VA0002379895 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.
- 11. Defendant FANDEE has used the federally registered copyright image protected by VA0002379888 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.

- 12. Defendant MOJICK has used the federally registered copyright image protected by VA0002384827 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois. This same Defendant has used another Rotita owned unregistered copyright protected image without authorization in the sale of one other counterfeit product being shipped to Chicago, Illinois.
- 13. Defendant Yiershu has used the federally registered copyright image protected by VA0002379888 without authorization in the sale of two (2) counterfeit products being shipped to Chicago, Illinois. Defendant Yiershu has used the federally registered copyright image protected by VA0002379893 without authorization in the sale of another counterfeit product being shipped to Chicago, Illinois.
- 14. This Defendant LaiyiVic has used a Rotita owned unregistered copyright protected image without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.
- 15. Defendant MsavigVice has used a Rotita owned unregistered copyright protected image without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.
- 16. Defendant SeNight has used a Rotita owned unregistered copyright protected image without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.
- 17. Defendant Bttup has used the federally registered copyright image protected by VA0002379911 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois. This same Defendant has used another Rotita owned unregistered copyright protected image without authorization in the sale of one other counterfeit product being shipped to Chicago, Illinois.

- 18. Defendant HugeNice has used a Rotita owned unregistered copyright protected image without authorization in the sale of two (2) counterfeit products being shipped to Chicago, Illinois.
- 19. Defendant IbuduSexy has used a Rotita owned unregistered copyright protected image without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.
- 20. Defendant LalaLin has used a Rotita owned unregistered copyright protected image without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.
- 21. The above transactions are described in greater detail below. They are also replicated in a chart, a true and correct copy of which is attached hereto as Exhibit "A".
- 22. On May 26, 2024, Lilly P. O'Dea placed order number 111-8233301-9818664 on Amazon.com, ordering product "PaladMom Casual Sleeveless Long Maxi Dresses Sundress for Women Summer Plus Size V Neck Loose Adjustable African Floral Printed Dress with Pockets" and is scheduled to be delivered to Chicago, Illinois. This product is sold by Defendant 172, PaladMom, in this action.
- 23. On May 26, 2024, Lilly P. O'Dea placed order number 111-2741435-1082619 on Amazon.com, ordering product "Women's Button Patchwork 2023 Casual Tops Long Sleeve V Neck Womens Square Neck Tank Tops Long Sleeve Jumpers for Women Women's Sweatshirts Plus Size (4-Red,X-Large)" and is scheduled to be delivered to Chicago, Illinois. This product is sold by Defendant 51, Tang jian, in this action.
- 24. On May 26, 2024, Lilly P. O'Dea placed order number 111-1984552-8520260 on Amazon.com, ordering products "Lace Floral A Line Ruffle Short Sleeve Plus Size Maxi Dress Elegant Classy Prom Evening Cold Shoulder Flowy Swing Solid Color Loose Fitting Cut Out

Mother of The Bride Dresses(B Blue,X-Large), ""FQZWONG Summer Tops for Women,Fashion 2022 Casual Short Sleeve Flower Print Button up V Neck Pleated Flowy Swing Boho Tops Hawaiian Henley Shirts Blouses T-Shirts Going Out Tops(B Black,Small)," "Sequin Dress for Women Elegant Bodycon Dress Plus Size Sexy Prom Party Club Formal Gowns and Evening Dresses Wedding Guest Dress Fashion Solid Puff Sleeve Mini Pencil Dress(B Black,X-Large)," and is scheduled to be delivered to Chicago, Illinois. These products are sold by Defendant 104, FQZWONG, in this action.

- 25. On May 26, 2024, Lilly P. O'Dea placed order number 111-3188129-9066667 on Amazon.com, ordering product "JTNFairy Plus-Size Bohemian Floral Maxi Dress for Women Casual Vacation Summer Beach Black Sundress" and it was delivered to Chicago, Illinois on May 29, 2024. This product is sold by Defendant 83, JTNFairy, in this action.
- 26. On May 26, 2024, I placed order number 111-8322209-4149042 on Amazon.com, ordering product "Womens Plus Size Summer Dress Formal Wedding Lace Stitching Floral Ruffle Short-Sleeved Strapless Prom Dress Wedding Dress" and is scheduled to be delivered to Chicago, Illinois. This product is sold by Defendant 109, Febecool, in this action.
- 27. On May 26, 2024, Lilly P. O'Dea placed order number 111-0460485-9319431on

 Amazon.com, ordering product "Women Solid Swimsuit Easter Day St. Patrick's Day

 Independence Day 2024 Flyaway Tankini Navy Swimsuit Baseball Hat Big Swim for Women

 Petite Tankini Swimsuits for Women" and is scheduled to be delivered to Chicago, Illinois. This

 product is sold by Defendant 62, Shusuen Tantisy Easter Day Big Promotion, in this action.
- 28. On June 3, 2024, Lilly P. O'Dea placed order number 111-0277422-5569073 on Amazon.com, ordering products: 1. JTNFairy Women Summer Short Sleeve Ruffle Wear to Work Church Wedding Guest Party Dresses White; 2. Yiershu Women's Casual Sexy Summer Print

Bodycon Long Suspender Maxi Dresses Floor Length Sleeveless Plus Size Sundresses(Pink Flower,M); 3. Womens Elegant Sleeveless Lace Dresses Wedding Guest Bodycon Pencil Dress Sexy Floral Cocktail Party Mini Dress; 4. Bttup Off Shoulder Wrap Dress for Women Mesh Sleeve Wrap Dress Party Dress Casual Long Flare Bell Sleeve Dresses Sheath Cocktail Party Outfits Black; 5. JTNFairy Women's Deep V Neck High Waist Jumpsuit Sexy Simple Cocktail Party Jumpsuit Yellow; 6. PaladMom 2024 Summer Sundress Plus Size Maxi Dresses for Women Casual V Neck Adjustable African Loose Sunflower Long Dress with Pockets; 7. Sexy Long Sleeve Mermaid Maxi Dress for Women Elegant Formal One Shoulder Red Evening Gown with Zipper X-Large; 8. LaiyiVic Maxi Dress for Women Casual Long Dress Colorful Print Round Neck Short Sleeve Summer Dress with Pockets Black X-Large; 9. IbuduSexy Half Sleeve Dress Color Block Casual Crew Neck Church Dresses for Women with Belt Black; 10. Pencil Dress for Women Bodycon Elegant Off Shoulder Long Bell Sleeve Vintage Sheath Dresses with Zipper; 11. SeNight Women's Dress Work Business Church Dresses Bodycon Half Ruffles Sleeve Round Neck Blue Floral Pencil Dresses with Bow Tie; 12. MsavigVice Maxi Dresses for Women Casual Button Down V Neck Womens Loose Floor Length Dress with Belt; 13. Women's 2 Piece Business Skirt Suit Casual Black Blazer Jackets and Pencil Midi Skirt Work Professional Sets with Buttons; 14. Women Dress Elegant Peplum Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper Dress White. These products are sold by Defendants: Defendant 83, JTNFairy; Defendant 40, Yiershu; Defendant 3, Bttup; Defendant 172, PaladMom; Defendant 16, HugeNice; Defendant 17, LaiyiVic; Defendant 112, IbuduSexy; Defendant 87, MOJICK; Defendant 30, SeNight; and Defendant 21, MsavigVice, in this action. These products are scheduled to be delivered to Chicago, Illinois.

- 29. On June 3, 2024, Lilly P. O'Dea placed order number 111-7971689-6545847 on Amazon.com, ordering products: 1. LalaLin Elegant Long Sleeve Dress for Women Solid Color Work Office Prom Bodycon Sexy Church Midi Dresses Blue; 2. Women Dress Elegant Peplum Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper Dress Dark Green; and 3. FANDEE Pink Plus Size Women's Dresses Vintage Bodycon Elegant Work 3/4 Sleeve Pencil Wedding Guest Party Church Dress XL. These products are sold by Defendants: Defendant 162, LalaLin; Defendant 40, Yiershu; and Defendant 7, Fandee Branch Store, in this action. These products are scheduled to be delivered to Chicago, Illinois.
- 30. On June 4, 2024, three (3) more items arrived to Chicago, Illinois from FANDEE, Lalalin and Yiershu.
- 31. Attached as Exhibit "B" are true and correct copies of screenshots of the confirmation order indicating the products will be shipped to Illinois and the status of shipped items to Illinois.
- 32. Attached as Exhibit "C" are true and correct copies of shipping confirmations for the ordered products that are in transit to Chicago, Illinois.
- 33. Attached as Exhibit "D" are true and correct copies of photos of the packaging received in Chicago, Illinois and products contained therein.
- 34. When reviewing the product listings as of the date of ordering, the products were active and the seller indicated they're willing and able to continue to sell and ship to Illinois residents by allowing consumers to add items to their online carts and order.

Case: 1:24-cv-02939 Document #: 74 Filed: 06/04/24 Page 9 of 9 PageID #:1693

I declare under penalty of perjury under the laws of the United States of America the foregoing is true and correct.

Executed on June 4, 2024 in Chicago, Illinois.

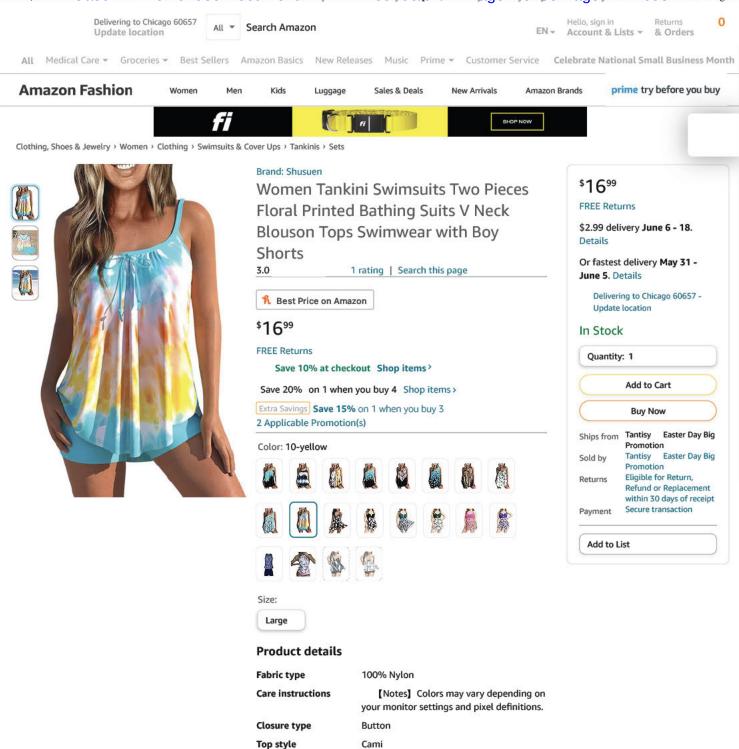
By: <u>/s/ Joseph W. Droter</u> JOSEPH W. DROTER, ESQ.

EXHIBIT A

Seller	Purchased Item	Copyrighted Photo	Registered Copyright	Link to Infringing Photo
МОЛСК	The second section of the section of the second section of the second section of the section of the second section of the section o		VA0002384827	https://www.amazon.co m/dp/B0CJ4HZNPH?ps c=1
МОЛСК	Manufacture and a second control of the control of	• • • • • • • • • • • • • • • • • • • •	Protected Image	https://www.amazon.co m/dp/B0C93627MM?ps c=1
IbuduSexy	The state of the s		Protected Image	https://www.amazon.co m/dp/B0BVM2VJSC?ps c=1
Bttup	Management Man		Protected Image	https://www.amazon.co m/dp/B0C9SSVHQM?p sc=1
HugeNice	The second secon	î î î	Protected Image	https://www.amazon.co m/dp/B0BRR742XX?ps c=1
LalaLin	Section of the control of the contro		Protected Image	https://www.amazon.co m/dp/B09ZGVLLCZ?ps c=1
FQZWONG Shop holiday deals FQZWONG	with cold in the control of the cont		VA0002379895	https://www.amazon.co m/dp/B09XZTJ84P?psc =1

FQZWONG Shop holiday deals FQZWONG	The state of the s		VA0002379881	https://www.amazon.co m/dp/B09QPVG9Q8?ps c=1
Generic Febecool	The state of the s		VA0002379895	https://www.amazon.co m/dp/B0C5HBYZLT?ps c=1
Generic Tang jian	The state of the s		VA0002379888	https://www.amazon.co m/dp/B0CR3Y2GXS?th =1&psc=1
Shusuen Tantisy Easter Day Big Promotion	The second secon		VA0002381070 VA0002381171 VA0002381172	https://www.amazon.co m/dp/B0BYRKRV51?p sc=1
PaladMom		8 8 8 9	VA0002379911	https://www.amazon.co m/dp/B09QKP5MYL?p sc=1
JTNFairy	The state of the s	8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8 8	VA0002379911	https://www.amazon.co m/dp/B0CY2KR8PB?th =1&psc=1

EXHIBIT B



About this item

Country of Origin

 Feature:outfit for women swimsuits women tankini burkini swimsuits for women red white and blue padded bikini top tremaker floral cover for women traje de women 2023 women's athletic two piece swimsuits women workout outfits sports tie dye one piece suit sun and moon bikini set shorts we

China

✓ See more

Report an issue with this product or seller



Details for Order #111-0460485-9319431

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-0460485-9319431

Order Total: \$19.85

Not Yet Shipped

Items Ordered Price

1 of: Women Solid Swimsuit Easter Day St. Patrick's Day Independence Day 2024 Flyaway Tankini Navy Swimsuit Baseball Hat \$16.99 Big Swim for Women Petite Tankini Swimsuits for Women

Sold by: Tantisy ★Easter Day Big Promotion (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

Standard Shipping

Payment Method:

Billing address

United States

\$16.99	Item(s) Subtotal:
\$2.99	Shipping & Handling:
-\$1.70	Promotion Applied:
\$18.28	Total before tax:

Lilly O'Dea Total before tax: \$18.28

Estimated tax to be collected: \$1.57

CHICAGO, IL 60613-5656

Payment information

Grand Total: \$19.85

To view the status of your order, return to Order Summary.

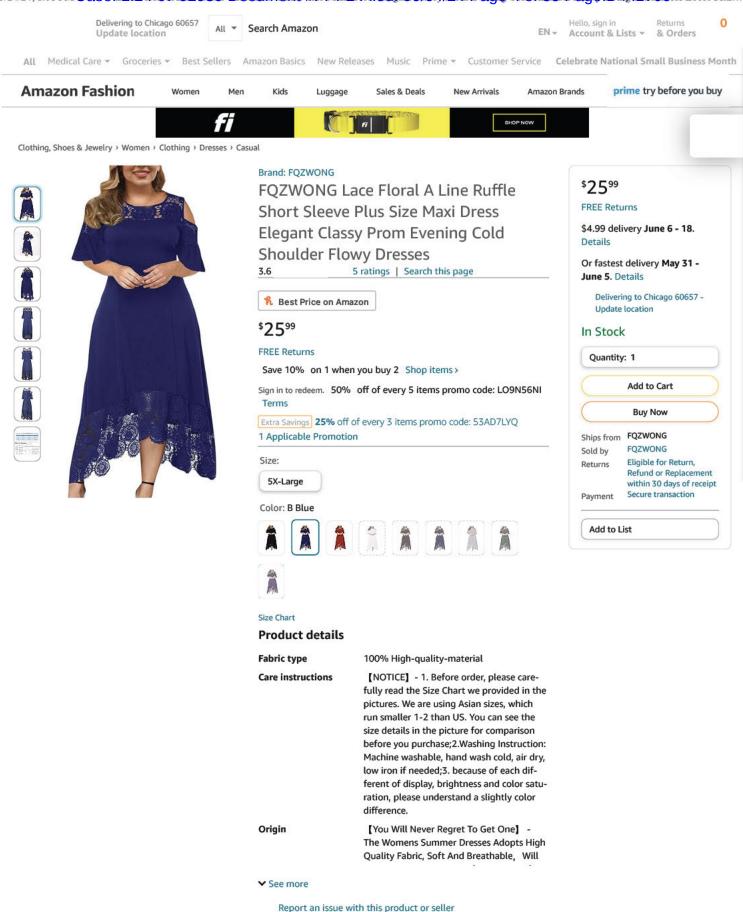
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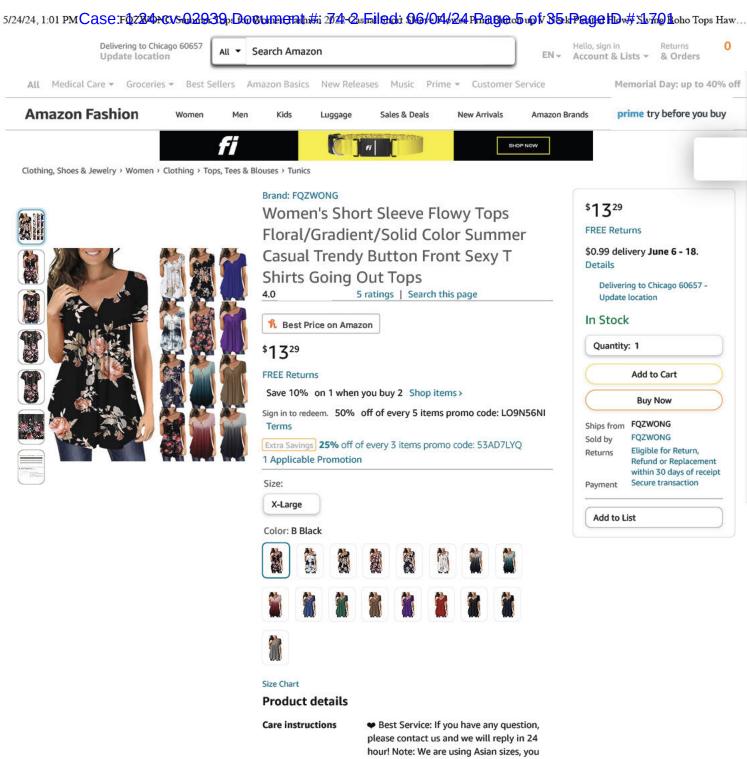
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Styling ideas



can see the size details in the picture for comparison.

Fur description

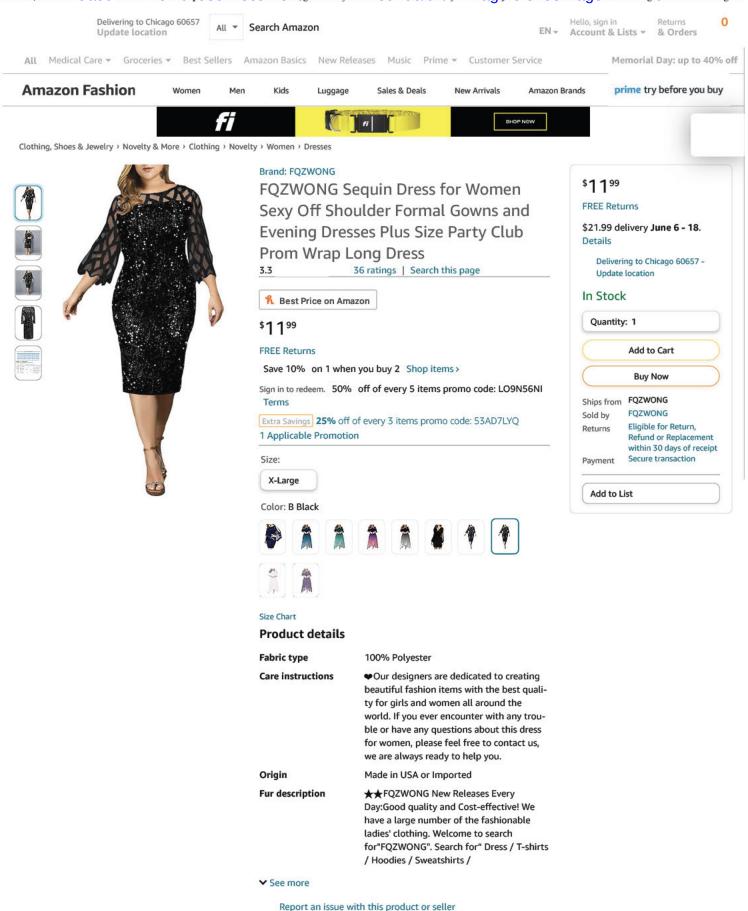
★★FQZWONG New Releases Every Day:We have a large number of the fashionable ladies' clothing. Welcome to search for"FQZWONG". Search for" Dress / T-shirts

Pants/Skirts/Bodysuits/Vests/Jeans/Overal ls/Jumpsuits/Rompers/Leggings/Lingerie/ Shorts/Blazers/Suiting/Swimsuits/Blouses/ Tees/Hoodies / Sweatshirts /

Cardigan/Sweaters/Coats /Tops/Jackets"in our storefront for more RIG discount prod-

✓ See more

Report an issue with this product or seller



Customers also viewed these products



Details for Order #111-1984552-8520260

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-1984552-8520260

Order Total: \$83.17

Not Yet Shipped

Items Ordered Price

1 of: Lace Floral A Line Ruffle Short Sleeve Plus Size Maxi Dress Elegant Classy Prom Evening Cold Shoulder Flowy Swing Solid \$25.99 Color Loose Fitting Cut Out Mother of The Bride Dresses(B Blue, X-Large)

Sold by: FQZWONG (seller profile)

Supplied by: Other

Condition: New

1 of: FQZWONG Summer Tops for Women, Fashion 2022 Casual Short Sleeve Flower Print Button up V Neck Pleated Flowy \$13.29

Swing Boho Tops Hawaiian Henley Shirts Blouses T-Shirts Going Out Tops(B Black, Small)

Sold by: FQZWONG (seller profile)

Supplied by: Other

Condition: New

1 of: Sequin Dress for Women Elegant Bodycon Dress Plus Size Sexy Prom Party Club Formal Gowns and Evening Dresses

\$11.99 Wedding Guest Dress Fashion Solid Puff Sleeve Mini Pencil Dress(B Black, X-Large)

Sold by: FQZWONG (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

CHICAGO, IL 60613-5656

United States

Lilly O'Dea

Shipping Speed:

Standard Shipping

Payment information

Payment Method: Item(s) Subtotal: \$51.27 Shipping & Handling: \$27.97

Promotion Applied: -\$1.20

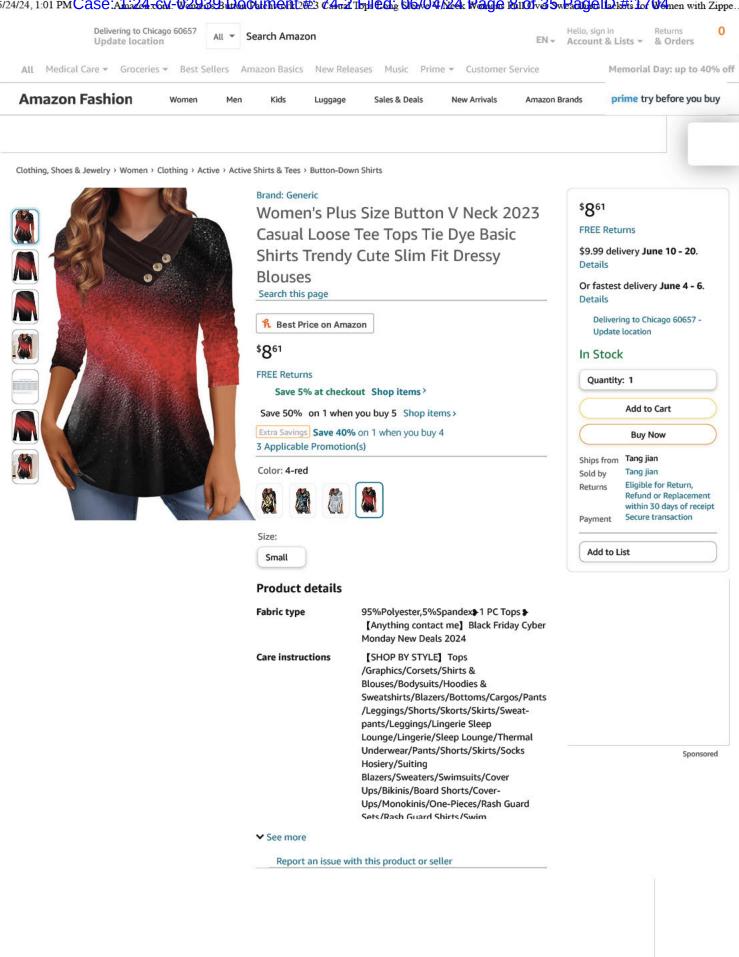
Billing address

Total before tax: \$78.04 Estimated tax to be collected: \$5.13

United States Grand Total: \$83.17

To view the status of your order, return to Order Summary.

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https://www.amazon.com/dp/B0CR3Y2GXS?th=1&psc=1

Sponsored



Details for Order #111-2741435-1082619

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-2741435-1082619

Order Total: \$20.35

Not Yet Shipped

Items Ordered Price

1 of: Women's Button Patchwork 2023 Casual Tops Long Sleeve V Neck Womens Square Neck Tank Tops Long Sleeve Jumpers for Women Women's Sweatshirts Plus Size (4-Red,X-Large)

Sold by: Tang jian (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

Standard Shipping

Pa	yment information	
Payment Method:	Item(s) Subtotal:	\$9.89
Visa ending in 8357	Shipping & Handling:	\$9.99
	Promotion Applied:	-\$0.49
Billing address		
Lilly O'Dea	Total before tax:	\$19.39
	Estimated tax to be collected:	\$0.96
CHICAGO, IL 60613-5656		
United States	Grand Total:	\$20.35

To view the status of your order, return to Order Summary.

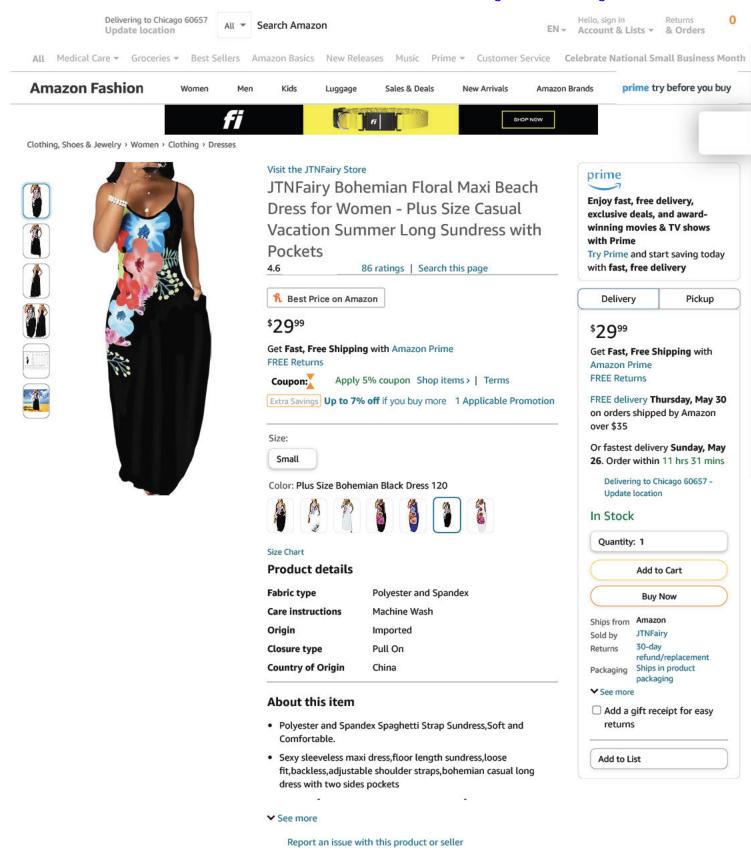
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\$9.89



Explore more in the dresses collections



Details for Order #111-3188129-9066667

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-3188129-9066667

Order Total: \$32.07

Not Yet Shipped

Items Ordered Price

1 of: JTNFairy Plus-Size Bohemian Floral Maxi Dress for Women - Casual Vacation Summer Beach Black Sundress

Sold by: JTNFairy (seller profile) | Product question? Ask Seller

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

Rush Shipping

Pay	ment information	
Payment Method:	Item(s) Subtotal:	\$29.99
Visa ending in 8357	Shipping & Handling:	\$2.99
	Promotion Applied:	-\$0.90
Billing address	Free Shipping:	-\$2.99
Lilly O'Dea		100 100 100 100 100 100 100 100 100 100
	Total before tax:	\$29.09
CHICAGO, IL 60613-5656	Estimated tax to be collected:	\$2.98
United States		2000000
	Grand Total:	\$32.07

To view the status of your order, return to Order Summary.

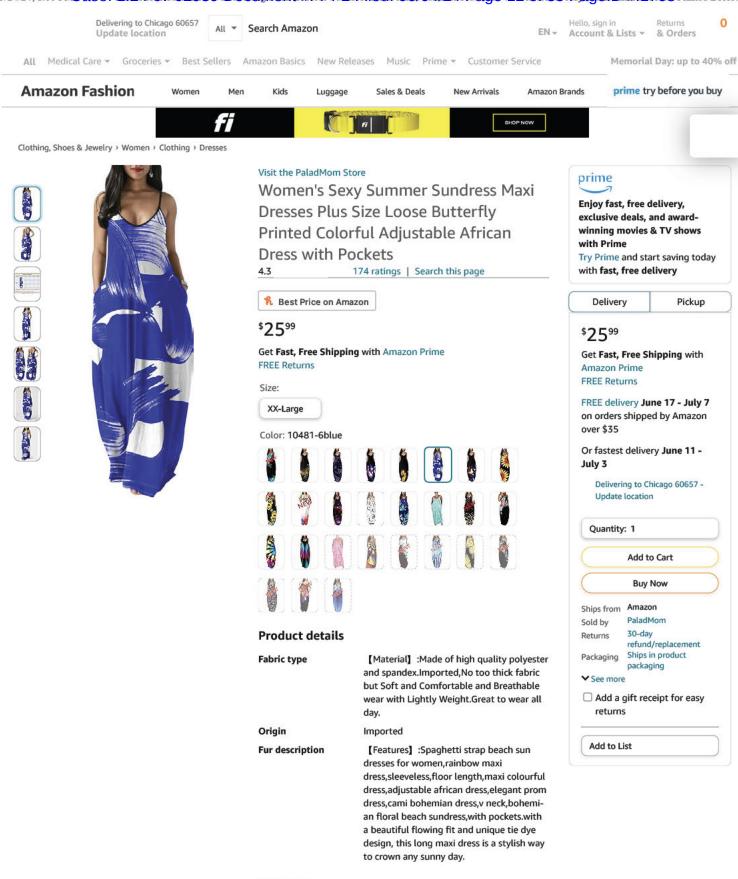
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\$29.99



See more

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Customers frequently viewed

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Details for Order #111-8233301-9818664

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-8233301-9818664

Order Total: \$28.65

Not Yet Shipped

Items Ordered Price

1 of: PaladMom Casual Sleeveless Long Maxi Dresses Sundress for Women Summer Plus Size V Neck Loose Adjustable African \$25.99 Floral Printed Dress with Pockets

Sold by: PaladMom (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

FREE Prime Delivery

Par	yment information	
Payment Method:	Item(s) Subtotal:	\$25.99
Visa ending in 8357	Shipping & Handling:	\$0.00
Billing address	Total before tax:	\$25.99
Lilly O'Dea	Estimated tax to be collected:	\$2.66

CHICAGO, IL 60613-5656 **Grand Total:** \$28.65

United States

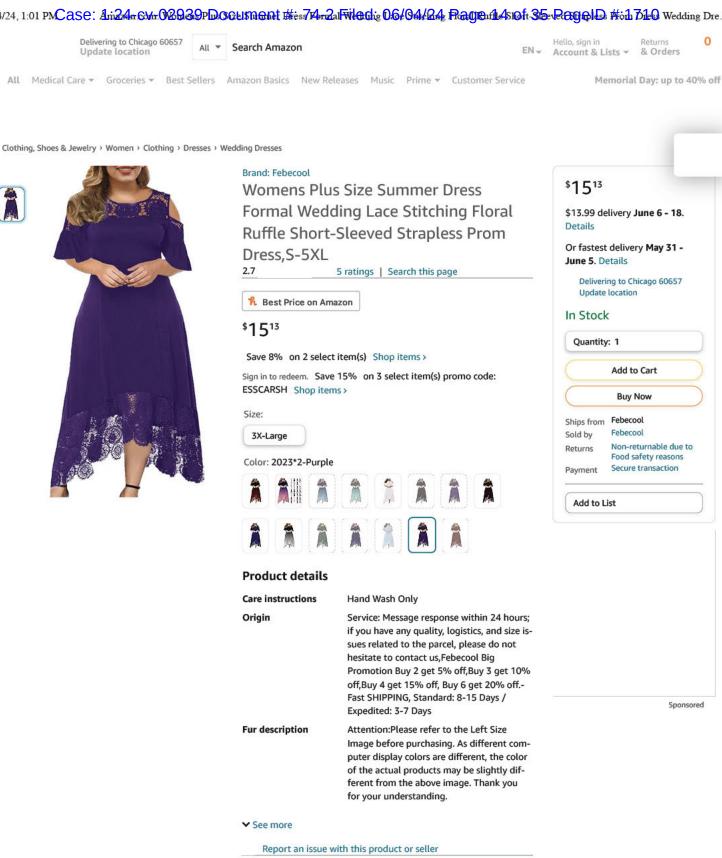
To view the status of your order, return to Order Summary.

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Details for Order #111-8322209-4149042

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-8322209-4149042

Order Total: \$30.67

Not Yet Shipped

Items Ordered Price

1 of: Womens Plus Size Summer Dress Formal Wedding Lace Stitching Floral Ruffle Short-Sleeved Strapless Prom Dress

Wedding Dress

Sold by: Febecool (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

Standard Shipping

Payment information

Payment Method: Item(s) Subtotal: \$15.13 \$13.99

Shipping & Handling:

Total before tax: \$29.12

Lilly O'Dea Estimated tax to be collected: \$1.55

\$15.13

CHICAGO, IL 60613-5656 **Grand Total:** \$30.67

United States

Billing address

To view the status of your order, return to Order Summary.

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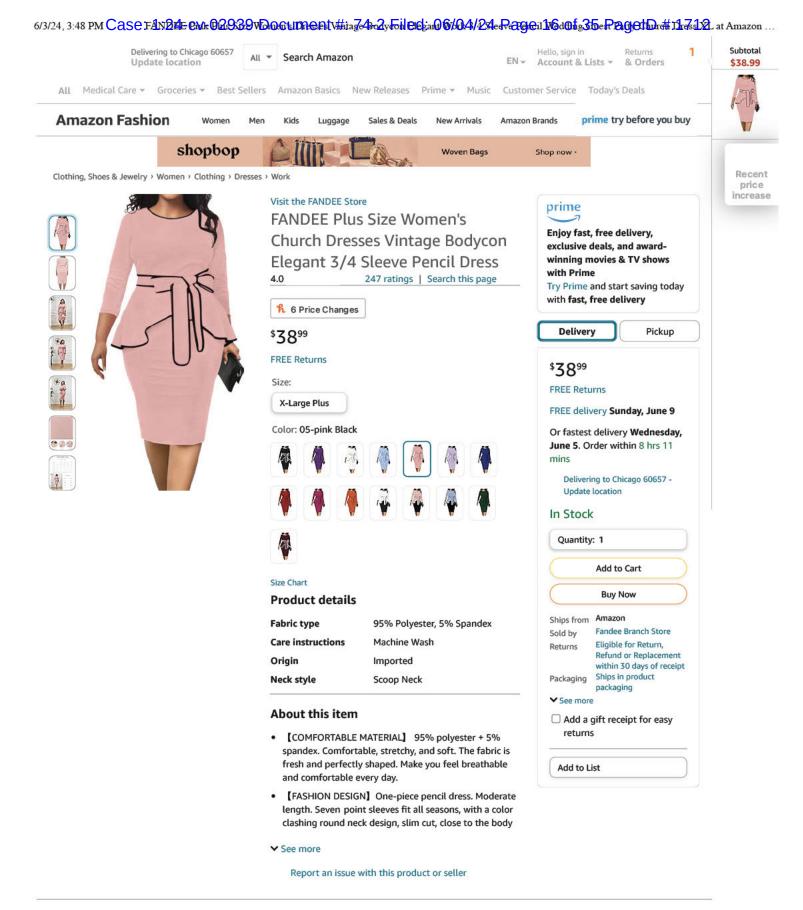
Back to top

English

United States

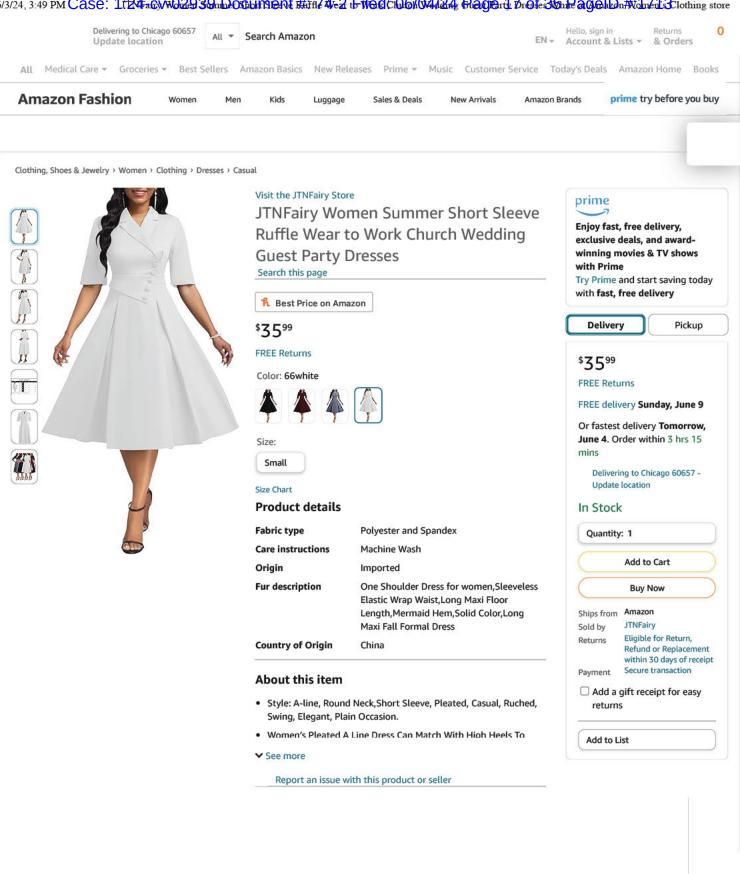
Help

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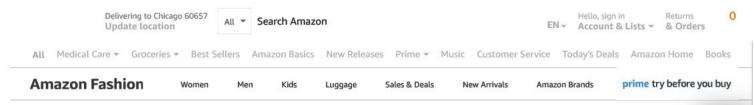
Styling ideas

Page 1 of 5



Sponsored

Styling ideas



Clothing, Shoes & Jewelry > Women > Clothing > Dresses > Casual



Visit the LaiviVic Store

LaiyiVic Maxi Dress for Women Casual Long Dress Colorful Print Round Neck Short Sleeve Summer Dress with Pockets

3.7 70 ratings | Search this page

R Best Price on Amazon

\$3599

FREE Returns

Join Prime to buy this item at \$32.39

Size:

X-Large

Color: Color11337-1











Size Chart

Product details

Fabric type Polyester and Spandex
Care instructions Hand Wash Only
Origin Imported
Closure type Pull On
Country of Origin China

About this item

- · Comfy polyester and spandex, soft and comfortable
- Features: Short sleeve, Casual Long beach dress, Maxi dress with Pockets, Loose fit. It is so pretty, hangs well, flattering and can be dressed up or down.
- African print dress perfect for busty ladies and women,plus size

✓ See more

Report an issue with this product or seller

Similar item with fast delivery



FANDEE Plus Size Maxi Dress for Women Casual Summer Sundress V Neck 3/4 Sleeve (11280) \$39.99

prime

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Delivery

Pickup

\$3599

FREE Returns

FREE delivery Sunday, June 9

Or fastest delivery **Wednesday, June 5**. Order within 5 hrs 29 mins

Delivering to Chicago 60657 -Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by LaiyiVic
Returns Eligible for Return,

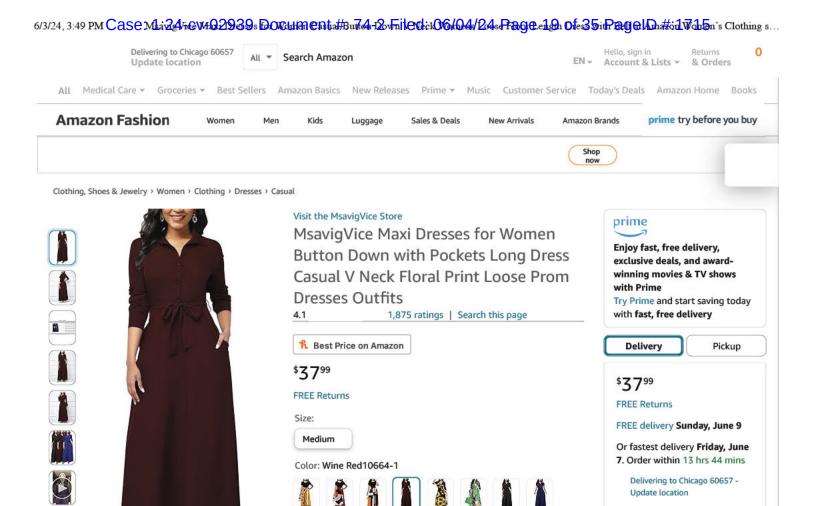
Refund or Replacement within 30 days of receipt

Packaging Ships in product packaging

✓ See more

 Add a gift receipt for easy returns

Add to List





Product details

Fabric type Polyester and Spandex

Care instructions Machine Wash

Care instructions Machine Norigin Imported
Closure type Pull On
Country of Origin China

About this item

- Features: Shirt Collar, Long Sleeve, Button Down, with Belt, Floral Print, Big Swing, Long Maxi Shirt Dress, African Ethnic Print, Long sleeve maxi dress makes you more charming
- Match:Pair this dress with flats for a casual look or pair it with heels and long necklace on date night. Also, it perfect for Merry Christmas season

✓ See more

Report an issue with this product or seller

Only 1 left in stock - order

Add to Cart

Buy Now

Amazon

MsavigVice

Eligible for Return,

Ships in product

packaging

☐ Add a gift receipt for easy

Refund or Replacement within 30 days of receipt

soon.

Ships from

Sold by

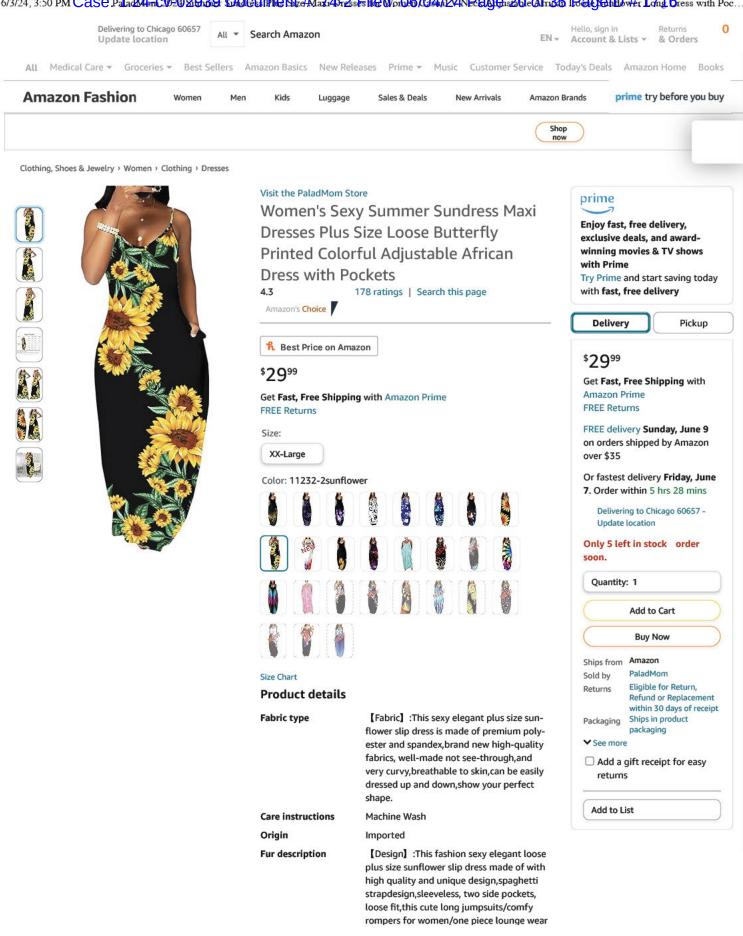
Returns

Packaging

✓ See more

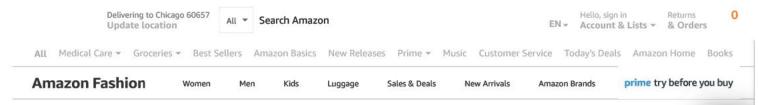
returns

Add to List



✓ See more

Report an issue with this product or seller



Clothing, Shoes & Jewelry > Women > Clothing > Dresses > Work



Visit the SeNight Store

Best Price on Amazon

SeNight Women's Dress Bodycon Church Dress Elegant Work Pencil Dress

330 ratings | Search this page

\$2999

Get Fast, Free Shipping with Amazon Prime

FREE Returns

Medium

Size:

Color: Blue-a



Size Chart

Product details

Fabric type 95% Polyester, 5% Spandex

Origin Imported

Fur description Made of soft surface, light and

comfortable.

Closure type Pull On
Country of Origin China

About this item

- This business work dress Size: there are 5 sizes for your choose:
 Small,Medium,Large,X Large,XX Large,please refer to the chearly size datas on below description page before ordering.
- Elegant and striking,a work dress half ruffles,bow tie, mini length style, suit for business work casual, party, club, etc wear.

✓ See more

Report an issue with this product or seller

prime

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Delivery

Pickup

\$2999

Get Fast, Free Shipping with Amazon Prime FREE Returns

FREE delivery June 22 - July 7 on orders shipped by Amazon over \$35

Or fastest delivery June 20 - July 3

Delivering to Chicago 60657 - Update location

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by SeNight
Patrons Fligible for

Returns Eligible for Return, Refund or Replacement within 30 days of receipt

Packaging Ships in product packaging

✓ See more

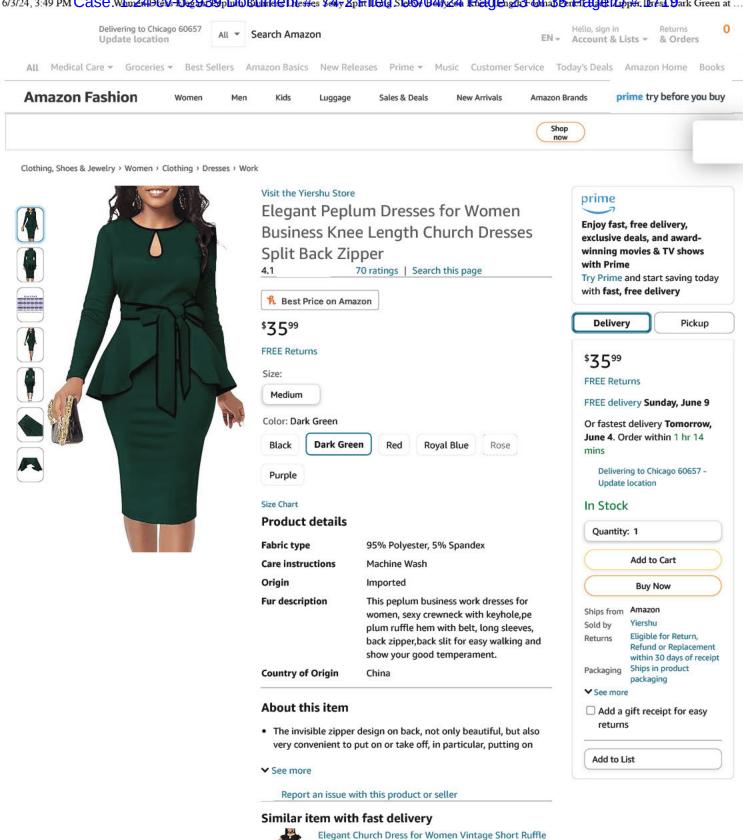
 Add a gift receipt for easy returns

Add to List

Report an issue with this product or seller

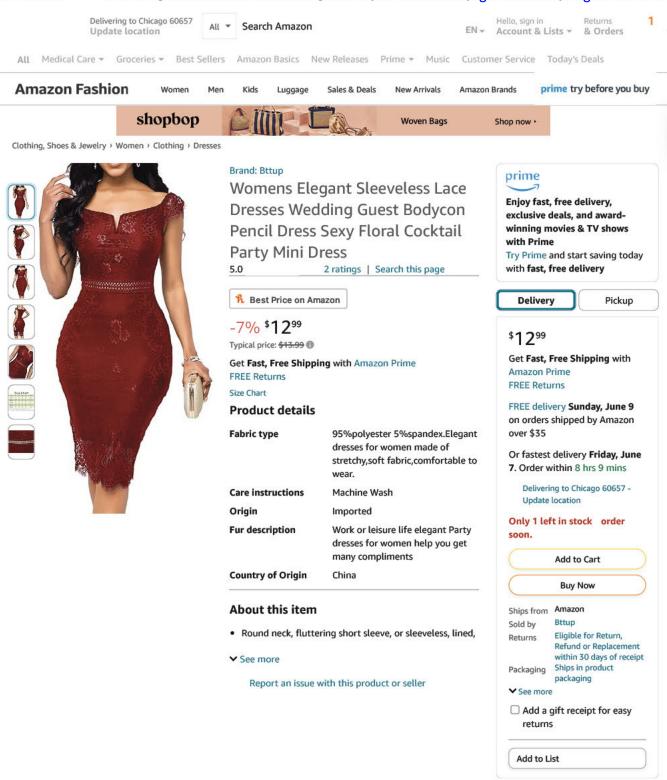
Sponsored

Styling ideas



Sleeve Bodycon Dresses wear to Work (13)

\$30.99

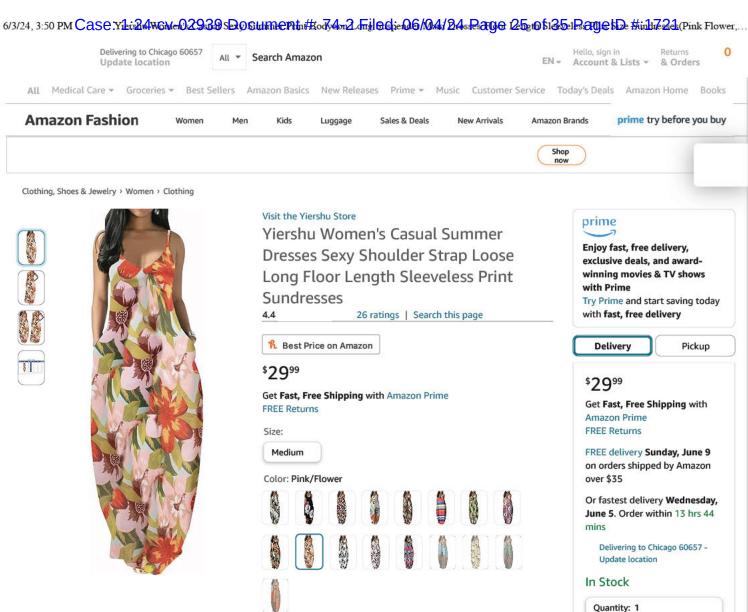


Styling ideas

Page 1 of 5

Subtotal

\$38.99



Size Chart

Product details

Fabric type 95% Polyester, 5% Spandex

Care instructions Hand Wash Only

Origin Imported

Fur description 95% Polyester, 26% Spandex

Country of Origin China

About this item

- Features:Crewneck,Sleeveless,Adjustable shoulder strap,Fashion print,Loose Style,Summer beach dress,Bohemian long maxi dress with pockets.Flattering enough, Flowy and Swing, Sexy and Stylish.
- Design:Plus Size Dresses,Flowy Fashionable Beach Dresses,Cover Up Sundress Relax Wear Maxi Dress Loose and Wide Hem.Cami

✓ See more

Report an issue with this product or seller

Similar item with fast delivery



Yiershu Women's Casual Summer Dresses Sexy Shoulder Strap Loose Long Floor Length Sleeveless **Print Sundresses**

Add to Cart

Buy Now

Eligible for Return,

Ships in product

packaging

☐ Add a gift receipt for easy

Refund or Replacement

within 30 days of receipt

Amazon

Yiershu

Ships from

Sold by

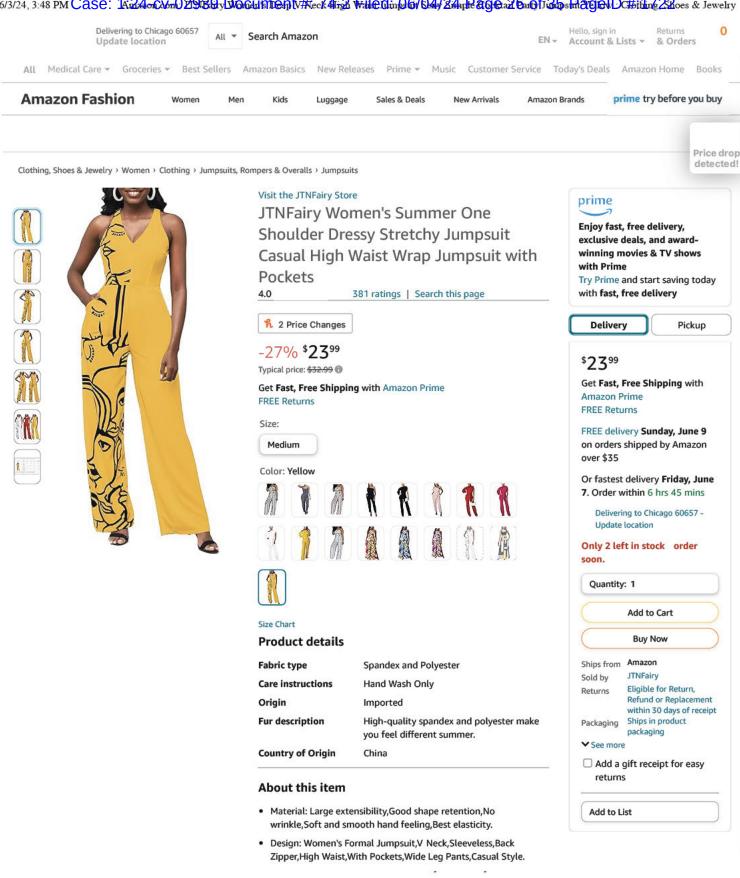
Returns

Packaging

✓ See more

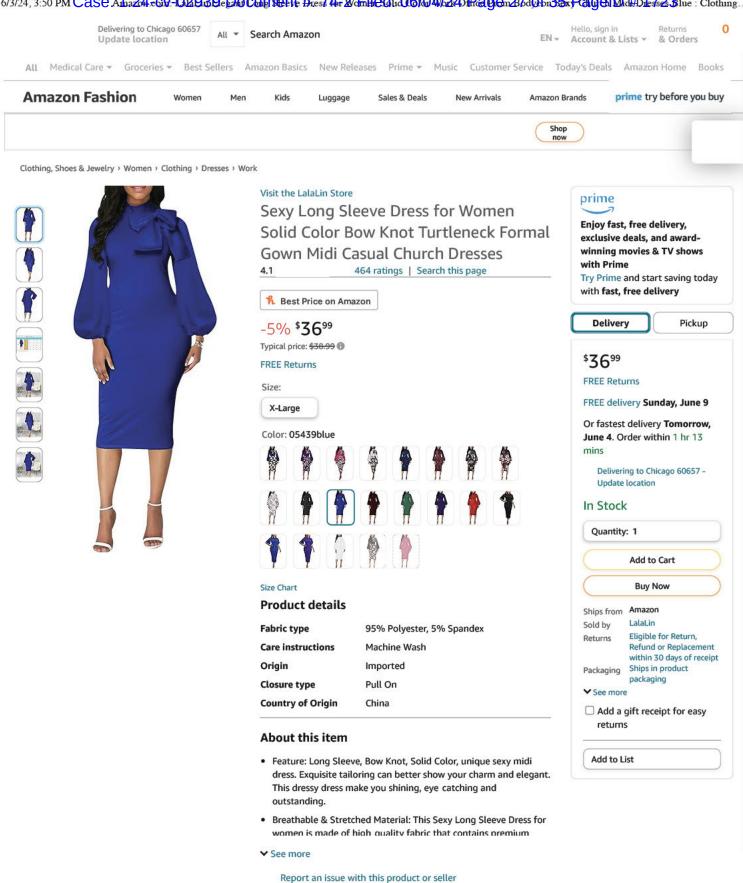
returns

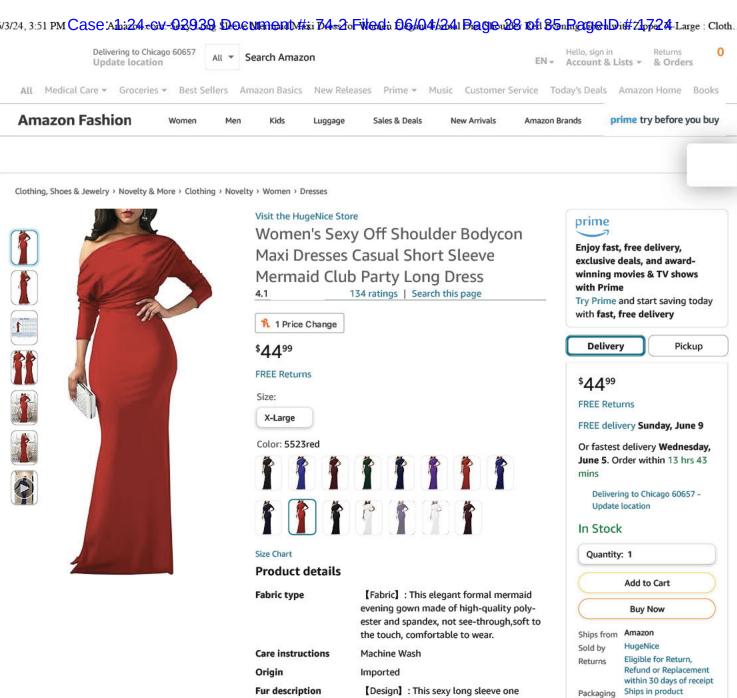
Add to List



✓ See more

Report an issue with this product or seller





shoulder maxi dresses,long sleeve, offshoulder design, V-shaped backless design on the back, and a hidden zipper design on the back, which is easy to put on and take off, the skirt of the long evening dress is a mermaid design, the skirt The length allows you to wear high heels and mop the floor. It can make you more elegant and

See more

Report an issue with this product or seller

Sponsored

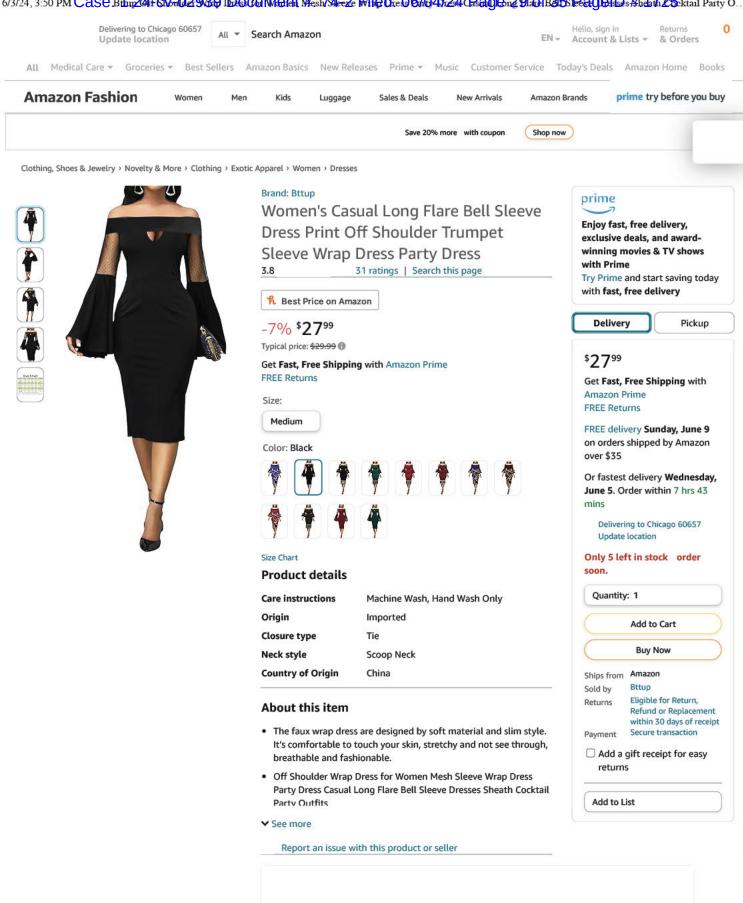
packaging

☐ Add a gift receipt for easy

✓ See more

returns

Add to List



Sponsored



Details for Order #111-0277422-5569073

Print this page for your records.

Order Placed: June 3, 2024

Amazon.com order number: 111-0277422-5569073

Order Total: \$484.27

Not Yet Shipped

Items Ordered 1 of: JTNFairy Women Summer Short Sleeve Ruffle Wear to Work Church Wedding Guest Party Dresses White Sold by: JTNFairy (seller profile) Product question? Ask Seller Supplied by: Other	Price \$35.99
Condition: New 1 of: Yiershu Women's Casual Sexy Summer Print Bodycon Long Suspender Maxi Dresses Floor Length Sleeveless Plus Size Sundresses(Pink Flower,M) Sold by: Yiershu (seller profile) Supplied by: Other	\$29.99
Condition: New 1 of: Womens Elegant Sleeveless Lace Dresses Wedding Guest Bodycon Pencil Dress Sexy Floral Cocktail Party Mini Dress Sold by: Bttup (seller profile) Supplied by: Other	\$12.99
Condition: New 1 of: Bttup Off Shoulder Wrap Dress for Women Mesh Sleeve Wrap Dress Party Dress Casual Long Flare Bell Sleeve Dresses Sheath Cocktail Party Outfits Black Sold by: Bttup (seller profile) Supplied by: Other	\$27.99
Condition: New 1 of: JTNFairy Women's Deep V Neck High Waist Jumpsuit Sexy Simple Cocktail Party Jumpsuit Yellow Sold by: JTNFairy (seller profile) Product question? Ask Seller Supplied by: Other	\$23.99
Condition: New 1 of: PaladMom 2024 Summer Sundress Plus Size Maxi Dresses for Women Casual V Neck Adjustable African Loose Sunflower Long Dress with Pockets Sold by: PaladMom (seller profile) Supplied by: Other	\$29.99
Condition: New 1 of: Sexy Long Sleeve Mermaid Maxi Dress for Women Elegant Formal One Shoulder Red Evening Gown with Zipper X-Large Sold by: HugeNice (seller profile) Supplied by: Other	\$44.99
Condition: New 1 of: LaiyiVic Maxi Dress for Women Casual Long Dress Colorful Print Round Neck Short Sleeve Summer Dress with Pockets Black X-Large Sold by: LaiyiVic (seller profile) Supplied by: Other	\$32.39

Condition: New

1 of: IbuduSexy Half Sleeve Dress Color Block Casual Crew Neck Church Dresses for Women with Belt Black

\$25.99

Sold by: IbuduSexy (seller profile)

Supplied by: Other

Condition: New

1 of: Pencil Dress for Women Bodycon Elegant Off Shoulder Long Bell Sleeve Vintage Sheath Dresses with Zipper

\$30.99

Sold by: MOJICK (seller profile)

Supplied by: Other

Condition: New

1 of: SeNight Women's Dress Work Business Church Dresses Bodycon Half Ruffles Sleeve Round Neck Blue Floral Pencil Dresses \$29.99 with Bow Tie

Sold by: SeNight (seller profile)

Supplied by: Other

Condition: New

1 of: MsavigVice Maxi Dresses for Women Casual Button Down V Neck Womens Loose Floor Length Dress with Belt

\$37.99

Sold by: MsavigVice (seller profile)

Supplied by: Other

Condition: New

1 of: Women's 2 Piece Business Skirt Suit Casual Black Blazer Jackets and Pencil Midi Skirt Work Professional Sets with Buttons \$39.99

Sold by: MOJICK (seller profile)

Supplied by: Other

Condition: New

1 of: Women Dress Elegant Peplum Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper \$35.99

Dress White

Sold by: Yiershu (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

United States

Shipping Speed:

FREE Prime Delivery

Payment information

Payment Method: Item(s) Subtotal: \$439.26

Shipping & Handling:

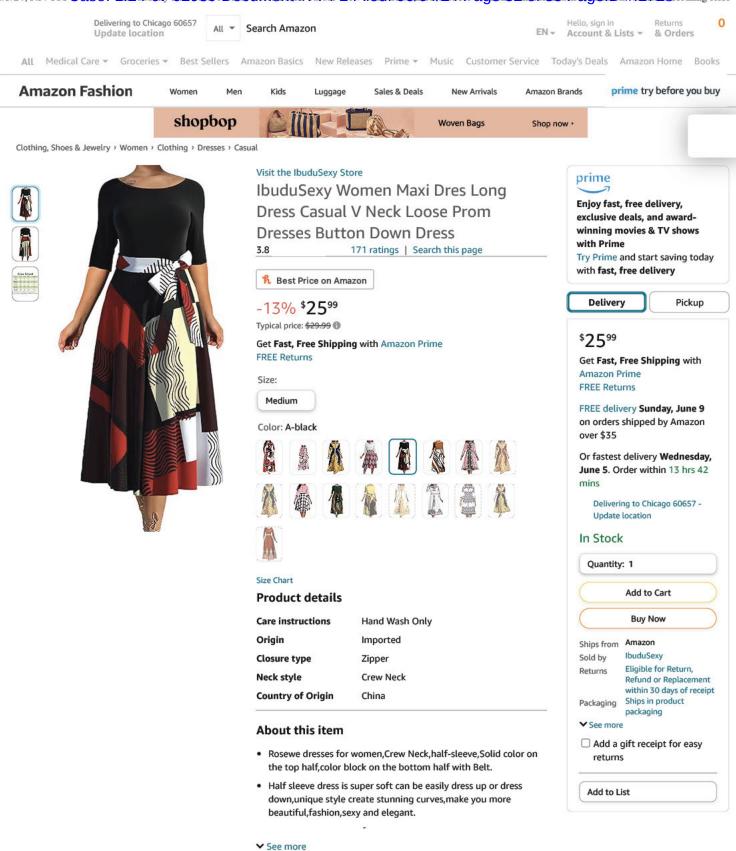
\$0.00 -----

Billing address Total before tax: \$439.26 Lilly O'Dea Estimated tax to be collected:

\$45.01

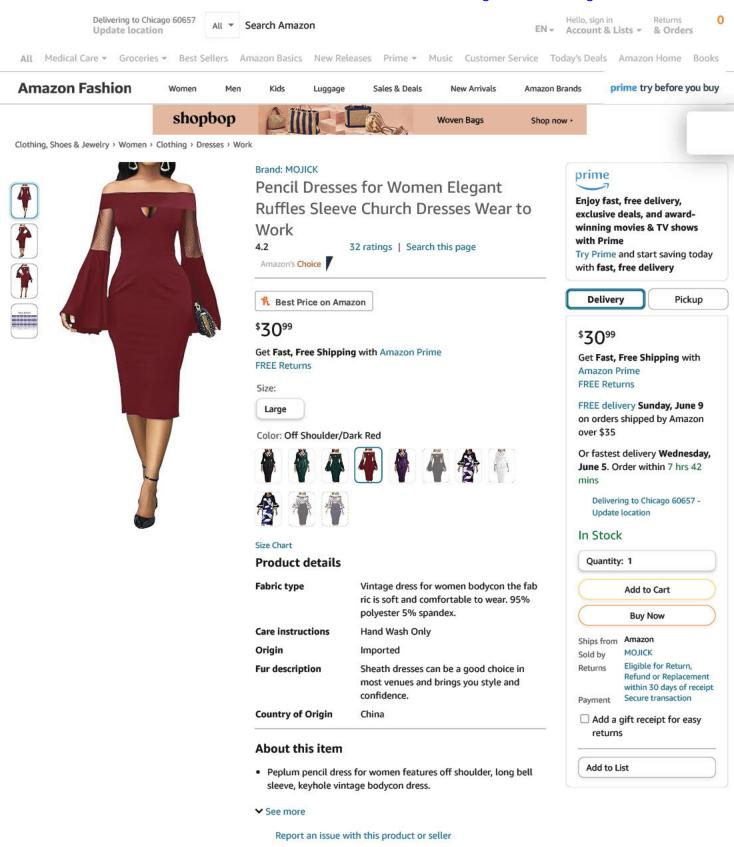
CHICAGO, IL 60613-5656 **Grand Total:** \$484.27

To view the status of your order, return to Order Summary.



Report an issue with this product or seller

Styling ideas



Styling ideas

Page 1 of 5

Report an issue with this product or seller

(84)

Allegra K Women's 2 Piece Suit Skirt Set Business Casual Long Sleeve Blazer and Pencil Skirt

Similar item with fast delivery

\$55.99

Amazon's Choice

Buy it with



Details for Order #111-7971689-6545847

Print this page for your records.

Order Placed: June 3, 2024

Amazon.com order number: 111-7971689-6545847

Order Total: \$123.45

Not Yet Shipped

Items Ordered Price

1 of: LalaLin Elegant Long Sleeve Dress for Women Solid Color Work Office Prom Bodycon Sexy Church Midi Dresses Blue

Sold by: LalaLin (seller profile)

Supplied by: Other

Condition: New

1 of: Women Dress Elegant Peplum Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper \$35.99

Dress Dark Green

Sold by: Yiershu (seller profile)

Supplied by: Other

Condition: New

1 of: FANDEE Pink Plus Size Women's Dresses Vintage Bodycon Elegant Work 3/4 Sleeve Pencil Wedding Guest Party Church

\$38.99

\$36.99

Dress XL

Sold by: Fandee Branch Store (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656 **United States**

Shipping Speed:

Rush Shipping

Payment information

Payment Method: Item(s) Subtotal: \$111.97 Shipping & Handling: \$2.99

Free Shipping: -\$2.99

Billing address Lilly O'Dea Total before tax: \$111.97 Estimated tax to be collected:

\$11.48

CHICAGO, IL 60613-5656 United States **Grand Total:** \$123.45

To view the status of your order, return to Order Summary.

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EXHIBIT C

ORDER PLACED May 26, 2024 TOTAL \$19.85 SHIP TO Lilly O'Dea Y ORDER # 111-0460485-9319431

View order details View invoice

Arriving June 6 - June 18

Shipped



Women Solid Swimsuit Easter Day St. Patrick's Day Independence Day 2024 Flyaway Tankini Navy Swimsuit Baseball Hat Big Swim for Women Petite Tankini Swimsuits for Women



Buy it again

Track package

Return or replace items

Share gift receipt

Leave seller feedback

Write a product review

Archive order

Case: 1:24-cv-02939 Document #: 74-3 Filed: 06/04/24 Page 3 of 4 PageID #:1734

ORDER PLACED TOTAL **SHIP TO** ORDER # 111-8322209-4149042 View order details View invoice May 26, 2024 \$30.67 Lilly O'Dea ~

Arriving June 6 - June 18

Shipped



Womens Plus Size Summer Dress Formal Wedding Lace Stitching Floral Ruffle Short-**Sleeved Strapless Prom Dress Wedding Dress**



Buy it again

Track package

Return or replace items

Leave seller feedback

Write a product review

Archive order

ORDER PLACED May 26, 2024 TOTAL

SHIP TO

\$28.65

Lilly O'Dea Y

ORDER # 111-8233301-9818664

View order details View invoice

Arriving Jun 13 - Jul 5



PaladMom Casual Sleeveless Long Maxi Dresses Sundress for Women Summer Plus Size V Neck Loose Adjustable African Floral Printed Dress with Pockets



Buy it again

Track package

View or edit order

Archive order

ORDER PLACED May 26, 2024 TOTAL

SHIP TO

\$32.07 Lilly O'Dea Y

ORDER # 111-3188129-9066667 View order details

View invoice

Delivered May 27

It was handed directly to a receptionist or someone at a front desk. Signed by: Front desk

Track package

Case: 1:24-cv-02939 Document #: 74-3 Filed: 06/04/24 Page 4 of 4 PageID #:1735

Arriving June 7 - June 18

Shipped



Women's Button Patchwork 2023 Casual Tops Long Sleeve V Neck Womens Square Neck Tank Tops Long Sleeve Jumpers for Women Women's Sweatshirts Plus Size (4-Red,X-Large)



Buy it again

Track package

Return or replace items

Share gift receipt

Leave seller feedback

Write a product review

Archive order

ORDER PLACED

TOTAL

SHIP TO

May 26, 2024

\$83.17

Lilly O'Dea ~

ORDER # 111-1984552-8520260

View order details View invoice

Arriving June 6 - June 18

Shipped

Lace Floral A Line Ruffle Short Sleeve Plus Size Maxi Dress Elegant Classy Prom Evening Cold Shoulder Flowy Swing Solid Color Loose Fitting Cut Out Mother of The Bride Dresses(B Blue,X-Large)

Return items: Eligible through July 6, 2024

FQZWONG Summer Tops for Women, Fashion 2022 Casual Short Sleeve Flower Print Button up V Neck Pleated Flowy Swing Boho Tops Hawaiian Henley Shirts Blouses T-Shirts Going Out Tops (B Black, Small)

Return items: Eligible through July 6, 2024

Sequin Dress for Women Elegant Bodycon Dress Plus Size Sexy Prom Party Club Formal Gowns and Evening Dresses Wedding Guest Dress Fashion Solid Puff Sleeve Mini Pencil Dress(B Black,X-Large)

Track package

Return items

Share gift receipt

Leave seller feedback

Write a product review

EXHIBIT D

Order #111-3188129-9066667 Defendant 51, Tang jian



IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS **EASTERN DIVISION**

HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE "A" HERETO,

Defendants.

Case No. **MFR BWJ** \mathbf{cv}

Honorable Matthew F. Kennelly

Magistrate Beth W. Jantz

DECLARATION OF LILLY P. O'DEA

I, Lilly P. O'Dea, of the City of Chicago, in the State of Illinois, declare as follows:

- Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.
- I make this declaration in support of Plaintiff's Reply In Support of Motion for 2. Preliminary Injunction (the "Reply").
- 3. I am an individual residing in the State of Illinois. I make this declaration from my matters within my own knowledge unless stated otherwise herein.
- 4. On May 26, 2024, I placed order number 111-8233301-9818664 on Amazon.com, ordering product "PaladMom Casual Sleeveless Long Maxi Dresses Sundress for Women Summer Plus Size V Neck Loose Adjustable African Floral Printed Dress with Pockets" and is scheduled

to be delivered to Chicago, Illinois. This product is sold by Defendant 172, PaladMom, in this action.

- 5. On May 26, 2024, I placed order number 111-2741435-1082619 on
 Amazon.com, ordering product "Women's Button Patchwork 2023 Casual Tops Long Sleeve V
 Neck Womens Square Neck Tank Tops Long Sleeve Jumpers for Women Women's Sweatshirts
 Plus Size (4-Red, -Large)" and is scheduled to be delivered to Chicago, Illinois. This product is sold by Defendant 51, Tang jian, in this action.
- 6. On May 26, 2024, I placed order number 111-1984552-8520260 on

 Amazon.com, ordering products "Lace Floral A Line Ruffle Short Sleeve Plus Size Maxi Dress Elegant Classy Prom Evening Cold Shoulder Flowy Swing Solid Color Loose Fitting Cut Out Mother of The Bride Dresses(B Blue, -Large), ""F ZWONG Summer Tops for Women, Fashion 2022 Casual Short Sleeve Flower Print Button up V Neck Pleated Flowy Swing Boho Tops Hawaiian Henley Shirts Blouses T-Shirts Going Out Tops(B Black, Small)," "Sequin Dress for Women Elegant Bodycon Dress Plus Size Sexy Prom Party Club Formal Gowns and Evening Dresses Wedding Guest Dress Fashion Solid Puff Sleeve Mini Pencil Dress(B Black, -Large)," and is scheduled to be delivered to Chicago, Illinois. These products are sold by Defendant 104, F ZWONG, in this action.
- 7. On May 26, 2024, I placed order number 111-3188129-9066667 on
 Amazon.com, ordering product "JTNFairy Plus-Size Bohemian Floral Maxi Dress for Women Casual Vacation Summer Beach Black Sundress" and it was delivered to Chicago, Illinois on May
 29, 2024. This product is sold by Defendant 83, JTNFairy, in this action.
 - 8. On May 26, 2024, I placed order number 111-8322209-4149042 on Amazon.com,

ordering product "Womens Plus Size Summer Dress Formal Wedding Lace Stitching Floral Ruffle Short-Sleeved Strapless Prom Dress Wedding Dress" and is scheduled to be delivered to Chicago, Illinois. This product is sold by Defendant 109, Febecool, in this action.

9. On May 26, 2024, I placed order number 111-0460485-9319431on

Amazon.com, ordering product "Women Solid Swimsuit Easter Day St. Patrick's Day

Independence Day 2024 Flyaway Tankini Navy Swimsuit Baseball Hat Big Swim for Women

Petite Tankini Swimsuits for Women" and is scheduled to be delivered to Chicago, Illinois. This

product is sold by Defendant 62, Shusuen Tantisy Easter Day Big Promotion, in this action.

10. On June 3, 2024, I placed order number 111-0277422-5569073 on Amazon.com, ordering products: 1. JTNFairy Women Summer Short Sleeve Ruffle Wear to Work Church Wedding Guest Party Dresses White; 2. Yiershu Women's Casual Sexy Summer Print Bodycon Long Suspender Maxi Dresses Floor Length Sleeveless Plus Size Sundresses(Pink Flower, M); 3. Womens Elegant Sleeveless Lace Dresses Wedding Guest Bodycon Pencil Dress Sexy Floral Cocktail Party Mini Dress; 4. Bttup Off Shoulder Wrap Dress for Women Mesh Sleeve Wrap Dress Party Dress Casual Long Flare Bell Sleeve Dresses Sheath Cocktail Party Outfits Black; 5. JTNFairy Women's Deep V Neck High Waist Jumpsuit Sexy Simple Cocktail Party Jumpsuit Yellow; 6. PaladMom 2024 Summer Sundress Plus Size Maxi Dresses for Women Casual V Neck Adjustable African Loose Sunflower Long Dress with Pockets; 7. Sexy Long Sleeve Mermaid Maxi Dress for Women Elegant Formal One Shoulder Red Evening Gown with Zipper -Large; 8. LaiyiVic Maxi Dress for Women Casual Long Dress Colorful Print Round Neck Short Sleeve Summer Dress with Pockets Black -Large; 9. IbuduSexy Half Sleeve Dress Color Block Casual Crew Neck Church Dresses for Women with Belt Black; 10. Pencil Dress for Women Bodycon Elegant Off Shoulder Long Bell Sleeve Vintage Sheath Dresses with Zipper; 11.

SeNight Women's Dress Work Business Church Dresses Bodycon Half Ruffles Sleeve Round Neck Blue Floral Pencil Dresses with Bow Tie; 12. MsavigVice Maxi Dresses for Women Casual Button Down V Neck Womens Loose Floor Length Dress with Belt; 13. Women's 2 Piece Business Skirt Suit Casual Black Blazer Jackets and Pencil Midi Skirt Work Professional Sets with Buttons; 14. Women Dress Elegant Peplum Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper Dress White. These products are sold by Defendants: Defendant 83, JTNFairy; Defendant 40, Yiershu; Defendant 3, Bttup; Defendant 172, PaladMom; Defendant 16, HugeNice; Defendant 17, LaiyiVic; Defendant 112, IbuduSexy; Defendant 87, MOJICK; Defendant 30, SeNight; and Defendant 21, MsavigVice, in this action. These products are scheduled to be delivered to Chicago, Illinois

- 11. On June 3, 2024, I placed order number 111-7971689-6545847 on

 Amazon.com, ordering products: 1. LalaLin Elegant Long Sleeve Dress for Women Solid Color

 Work Office Prom Bodycon Sexy Church Midi Dresses Blue; 2. Women Dress Elegant Peplum

 Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper Dress

 Dark Green; and 3. FANDEE Pink Plus Size Women's Dresses Vintage Bodycon Elegant Work

 3/4 Sleeve Pencil Wedding Guest Party Church Dress L. These products are sold by Defendants:

 Defendant 162, LalaLin; Defendant 40, Yiershu; and Defendant 7, Fandee Branch Store, in this

 action. These products are scheduled to be delivered to Chicago, Illinois
- 12. Attached as Exhibit "1" are true and correct copies of screenshots of the confirmation order indicating the products will be shipped to Illinois and the status of shipped items to Illinois.
- 13. Attached as Exhibit "2" are true and correct copy of the shipping status for the products that have been shipped to Chicago, Illinois, but have not been received by me.

Case: 1:24-cv-02939 Document #: 75 Filed: 06/04/24 Page 5 of 5 PageID #:1742

14. Attached as Exhibit "3" true and correct copies of photographs of the packaging

received and products contained therein.

15. Upon reviewing the product listings as of the date of this filing, the products remain

active and the seller indicating they're willing and able to continue to sell and ship to Illinois

residents by allowing consumers to add items to their online carts and order.

I declare under penalty of perjury under the laws of the United States of America the

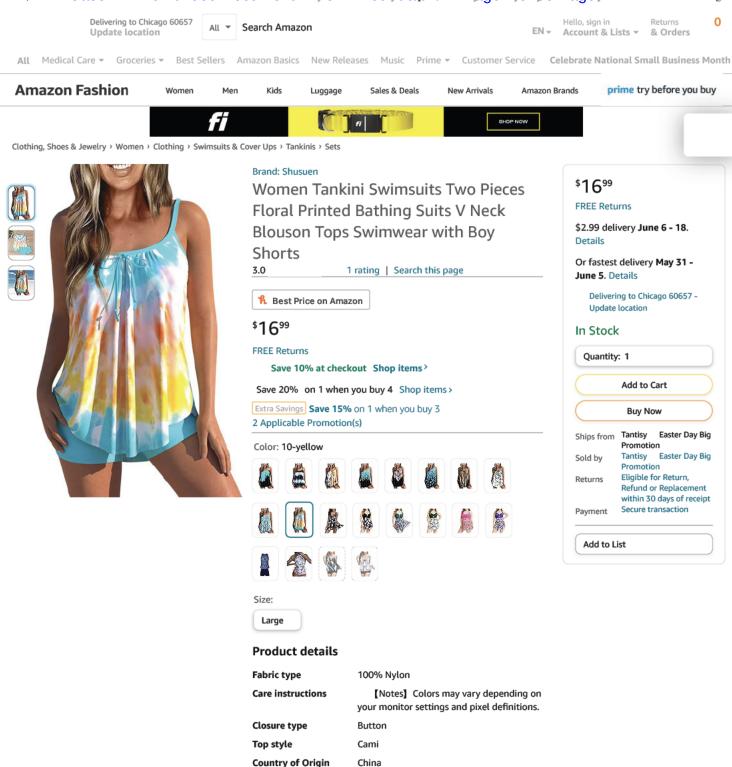
foregoing is true and correct.

Executed on June 4, 2024, in Chicago, Illinois.

By: /s/ Lilly P. O'Dea

LILLY P. O'DEA

EXHIBIT A



About this item

 Feature:outfit for women swimsuits women tankini burkini swimsuits for women red white and blue padded bikini top tremaker floral cover for women traje de women 2023 women's athletic two piece swimsuits women workout outfits sports tie dye one piece suit sun and moon bikini set shorts we

✓ See more

Report an issue with this product or seller



Details for Order #111-0460485-9319431

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-0460485-9319431

Order Total: \$19.85

Not Yet Shipped

Items Ordered Price

1 of: Women Solid Swimsuit Easter Day St. Patrick's Day Independence Day 2024 Flyaway Tankini Navy Swimsuit Baseball Hat \$16.99 Big Swim for Women Petite Tankini Swimsuits for Women

Sold by: Tantisy ★Easter Day Big Promotion (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

Standard Shipping

Paymo	ent information	
Payment Method:	Item(s) Subtotal:	\$16.99
Visa ending in 8357	Shipping & Handling:	\$2.99
	Promotion Applied:	-\$1.70
Billing address		
Lilly O'Dea	Total before tax:	\$18.28
	Estimated tax to be collected:	\$1.57
CHICAGO, IL 60613-5656		
United States	Grand Total:	\$19.85

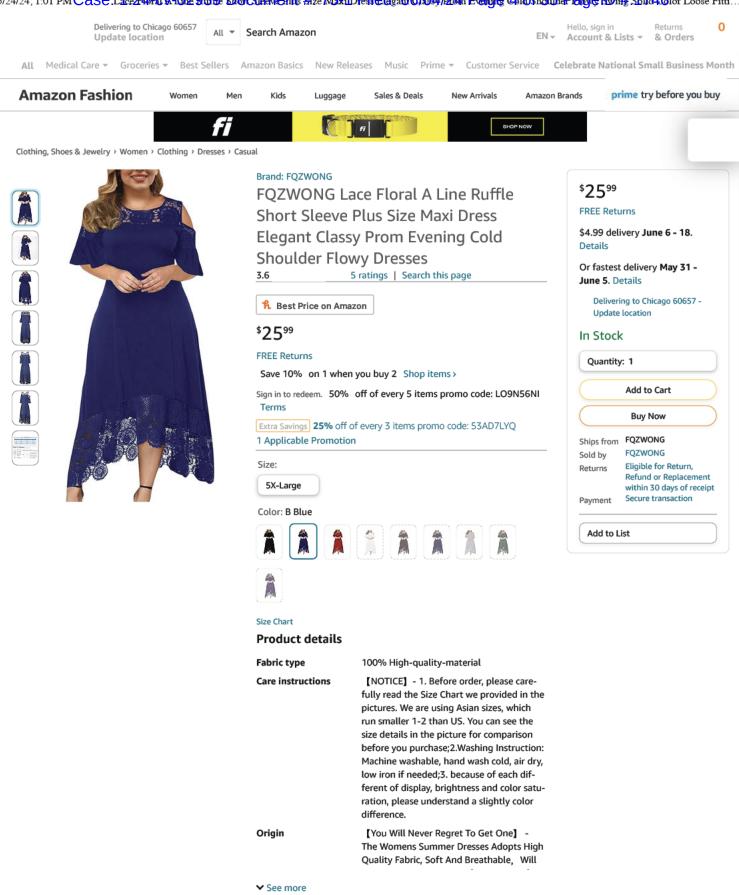
To view the status of your order, return to Order Summary.

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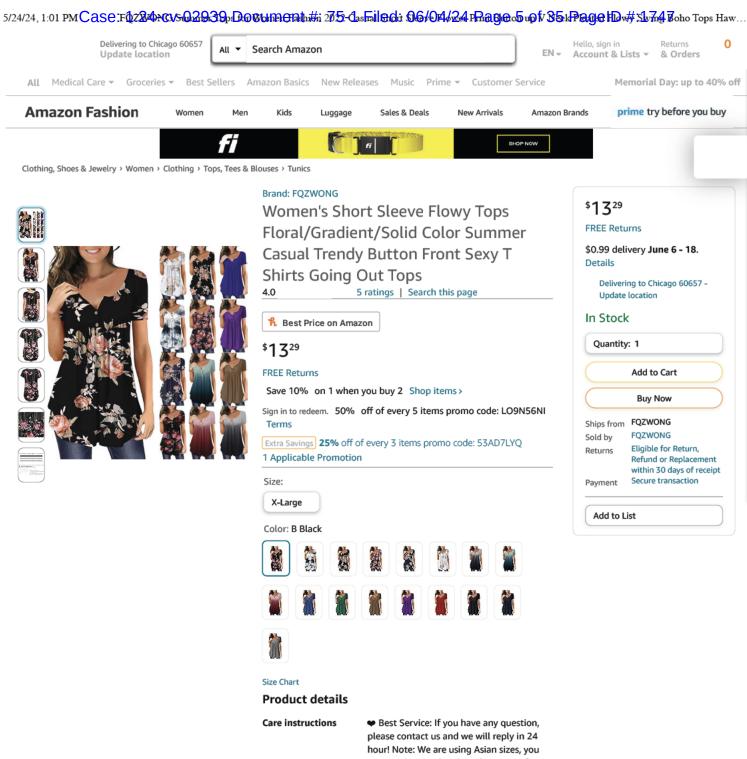
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Styling ideas



can see the size details in the picture for comparison.

Fur description

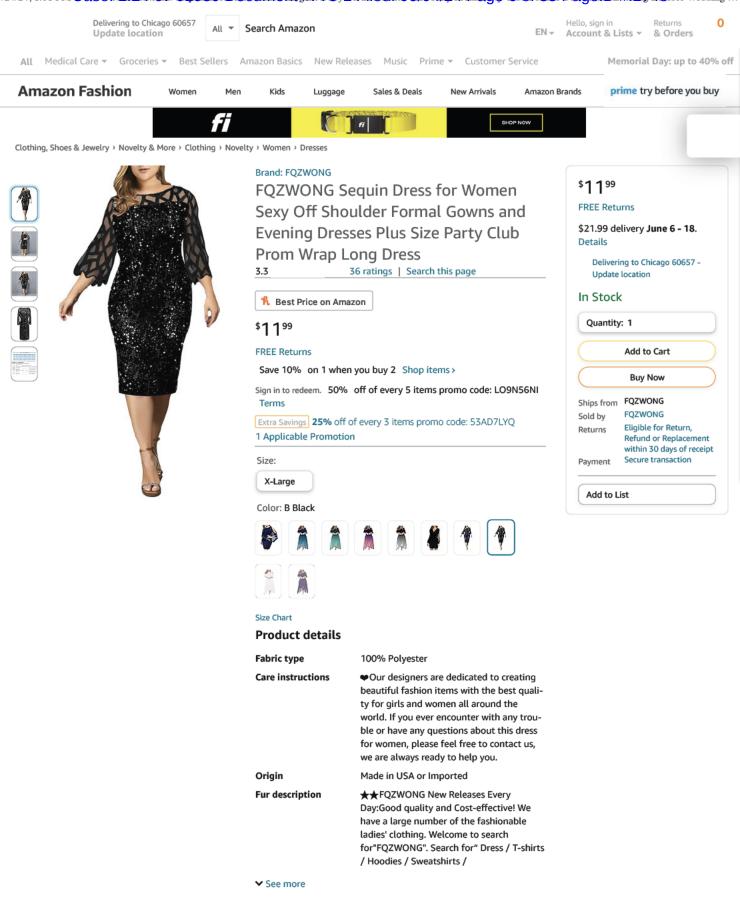
★★FQZWONG New Releases Every Day:We have a large number of the fashionable ladies' clothing. Welcome to search for"FQZWONG". Search for" Dress / T-shirts

Pants/Skirts/Bodysuits/Vests/Jeans/Overal ls/Jumpsuits/Rompers/Leggings/Lingerie/ Shorts/Blazers/Suiting/Swimsuits/Blouses/ Tees/Hoodies / Sweatshirts /

Cardigan/Sweaters/Coats /Tops/Jackets"in our storefront for more BIG discount prod-

✓ See more

Report an issue with this product or seller



Report an issue with this product or seller



Details for Order #111-1984552-8520260

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-1984552-8520260

Order Total: \$83.17

Not Yet Shipped

Items Ordered Price

1 of: Lace Floral A Line Ruffle Short Sleeve Plus Size Maxi Dress Elegant Classy Prom Evening Cold Shoulder Flowy Swing Solid \$25.99 Color Loose Fitting Cut Out Mother of The Bride Dresses(B Blue, X-Large)

Sold by: FQZWONG (seller profile)

Supplied by: Other

Condition: New

1 of: FQZWONG Summer Tops for Women,Fashion 2022 Casual Short Sleeve Flower Print Button up V Neck Pleated Flowy \$13.29

Swing Boho Tops Hawaiian Henley Shirts Blouses T-Shirts Going Out Tops(B Black, Small)

Sold by: FQZWONG (seller profile)

Supplied by: Other

Condition: New

1 of: Sequin Dress for Women Elegant Bodycon Dress Plus Size Sexy Prom Party Club Formal Gowns and Evening Dresses

\$11.99

Promotion Applied:

Wedding Guest Dress Fashion Solid Puff Sleeve Mini Pencil Dress(B Black,X-Large)

Sold by: FQZWONG (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

Standard Shipping

Payment information

Payment Method:Item(s) Subtotal:\$51.27Visa ending in 8357Shipping & Handling:\$27.97

Billing address

Lilly O'Dea Total before tax: \$78.04

Estimated tax to be collected: \$5.13

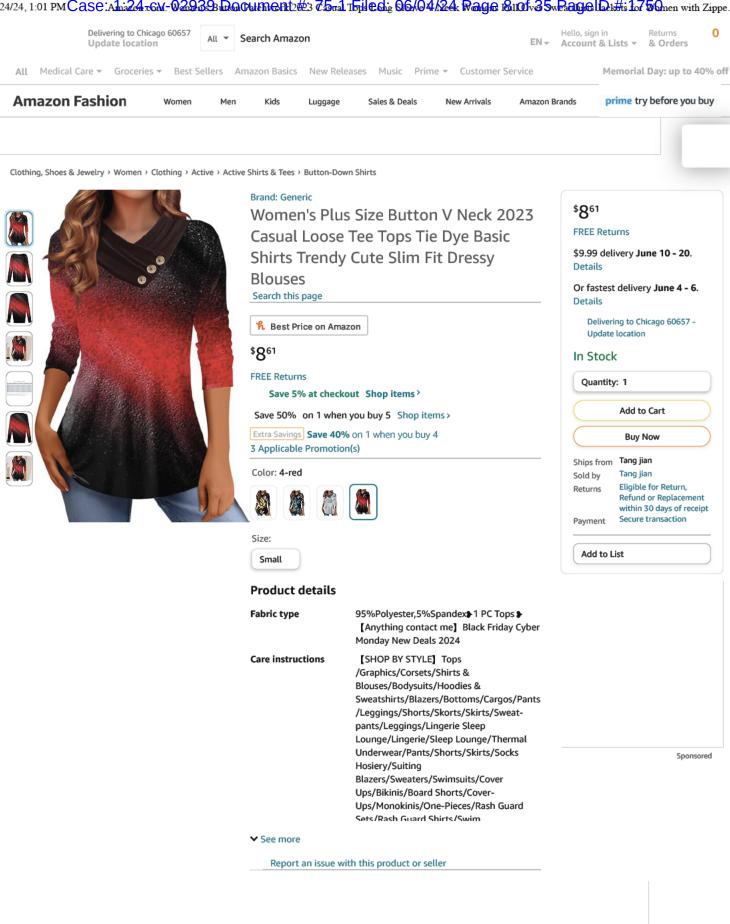
CHICAGO, IL 60613-5656 -----

United States **Grand Total:** \$83.17

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-\$1.20



Sponsored



Details for Order #111-2741435-1082619

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-2741435-1082619

Order Total: \$20.35

Not Yet Shipped

Items Ordered Price

1 of: Women's Button Patchwork 2023 Casual Tops Long Sleeve V Neck Womens Square Neck Tank Tops Long Sleeve Jumpers for Women Women's Sweatshirts Plus Size (4-Red,X-Large)

Sold by: Tang jian (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

Standard Shipping

Payı	ment information	
Payment Method:	Item(s) Subtotal:	\$9.89
Visa ending in 8357	Shipping & Handling:	\$9.99
	Promotion Applied:	-\$0.49
Billing address		
Lilly O'Dea	Total before tax:	\$19.39
	Estimated tax to be collected:	\$0.96
CHICAGO, IL 60613-5656		
United States	Grand Total:	\$20.35

To view the status of your order, return to Order Summary.

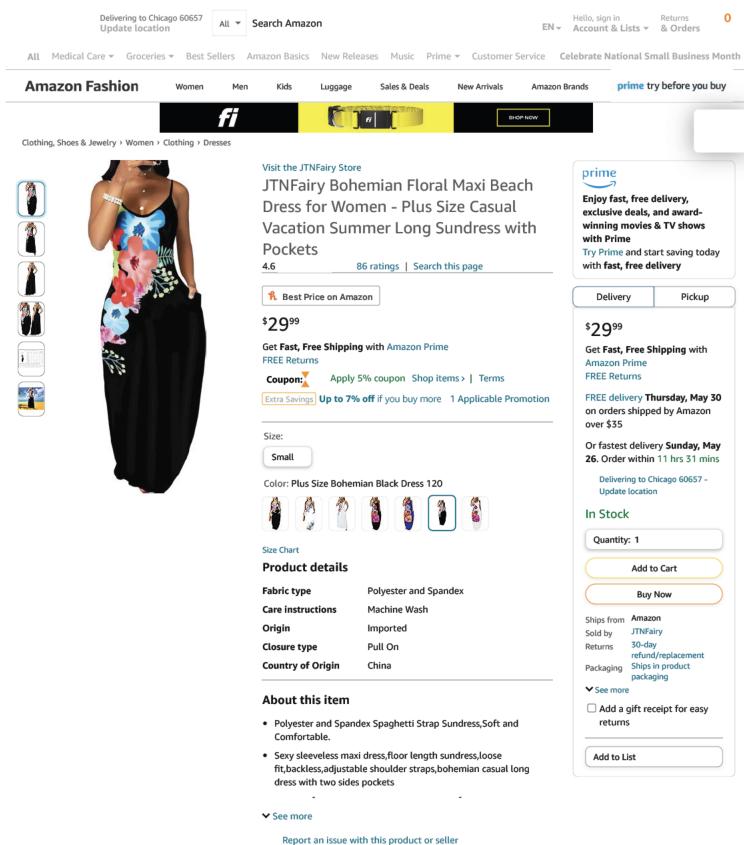
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\$9.89



Explore more in the dresses collections



Details for Order #111-3188129-9066667

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-3188129-9066667

Order Total: \$32.07

Not Yet Shipped

Items Ordered Price

1 of: JTNFairy Plus-Size Bohemian Floral Maxi Dress for Women - Casual Vacation Summer Beach Black Sundress

Sold by: JTNFairy (seller profile) | Product question? Ask Seller

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

Rush Shipping

Paym	nent information	
Payment Method:	Item(s) Subtotal:	\$29.99
Visa ending in 8357	Shipping & Handling:	\$2.99
	Promotion Applied:	-\$0.90
Billing address	Free Shipping:	-\$2.99
Lilly O'Dea		
	Total before tax:	\$29.09
CHICAGO, IL 60613-5656	Estimated tax to be collected:	\$2.98
United States		
	Grand Total:	\$32.07

To view the status of your order, return to Order Summary.

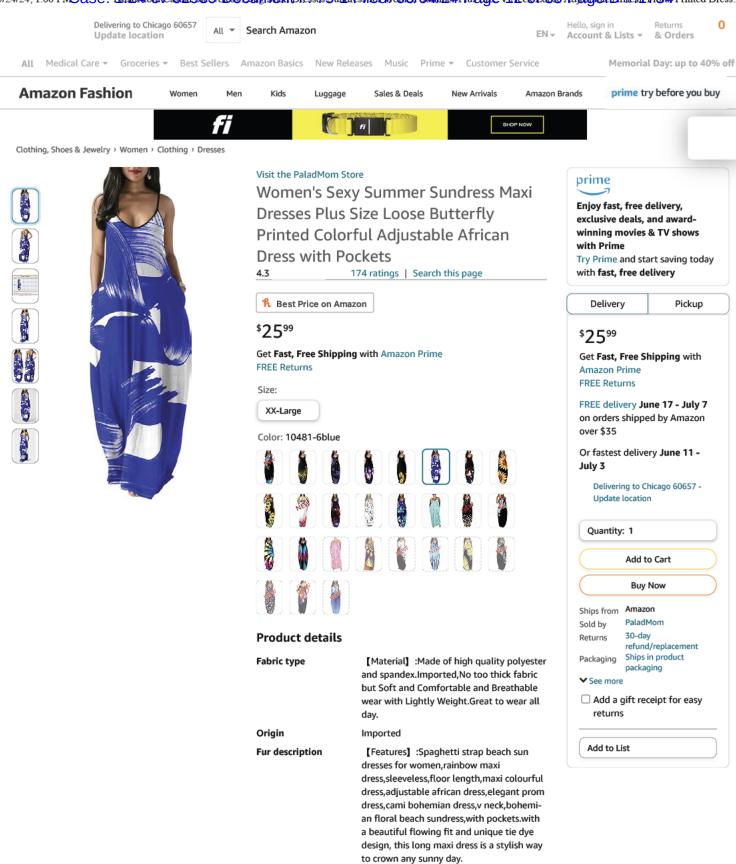
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\$29.99



See more

Report an issue with this product or seller

Customers frequently viewed

Sponsored Popular products in the last 7 days



Details for Order #111-8233301-9818664

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-8233301-9818664

Order Total: \$28.65

Not Yet Shipped

Items Ordered Price

1 of: PaladMom Casual Sleeveless Long Maxi Dresses Sundress for Women Summer Plus Size V Neck Loose Adjustable African \$25.99 Floral Printed Dress with Pockets

Sold by: PaladMom (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

FREE Prime Delivery

Payment Method: Visa ending in 8357

Billing address Lilly O'Dea

CHICAGO, IL 60613-5656

	rayment information
\$25.99	Item(s) Subtotal:
\$0.00	Shipping & Handling:
\$25.99	Total before tax:
\$2.66	Estimated tax to be collected:

-----Grand Total: \$28.65

United States

To view the status of your order, return to Order Summary.

Dayment information

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Brand: Febecool

Womens Plus Size Summer Dress Formal Wedding Lace Stitching Floral Ruffle Short-Sleeved Strapless Prom Dress, S-5XL

5 ratings | Search this page

R Best Price on Amazon

\$15¹³

Save 8% on 2 select item(s) Shop items >

Sign in to redeem. Save 15% on 3 select item(s) promo code: ESSCARSH Shop items >

Size:

3X-Large

Color: 2023*2-Purple

















Product details

Care instructions

Hand Wash Only

Origin

Service: Message response within 24 hours; if you have any quality, logistics, and size issues related to the parcel, please do not hesitate to contact us, Febecool Big Promotion Buy 2 get 5% off, Buy 3 get 10% off, Buy 4 get 15% off, Buy 6 get 20% off.-Fast SHIPPING, Standard: 8-15 Days /

Expedited: 3-7 Days

Fur description

Attention:Please refer to the Left Size Image before purchasing. As different computer display colors are different, the color of the actual products may be slightly different from the above image. Thank you for your understanding.

✓ See more

Report an issue with this product or seller

Sponsored

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Details for Order #111-8322209-4149042

Print this page for your records.

Order Placed: May 26, 2024

Amazon.com order number: 111-8322209-4149042

Order Total: \$30.67

Not Yet Shipped

Items Ordered Price

1 of: Womens Plus Size Summer Dress Formal Wedding Lace Stitching Floral Ruffle Short-Sleeved Strapless Prom Dress

Wedding Dress

Sold by: Febecool (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

Standard Shipping

Payment information

Payment Method:Item(s) Subtotal:\$15.13Visa ending in 8357Shipping & Handling:\$13.99

Billing addressTotal before tax: \$29.12

Estimated tax to be collected: \$1.55

CHICAGO, IL 60613-5656 **Grand Total:** \$30.67

United States

Lilly O'Dea

To view the status of your order, return to Order Summary.

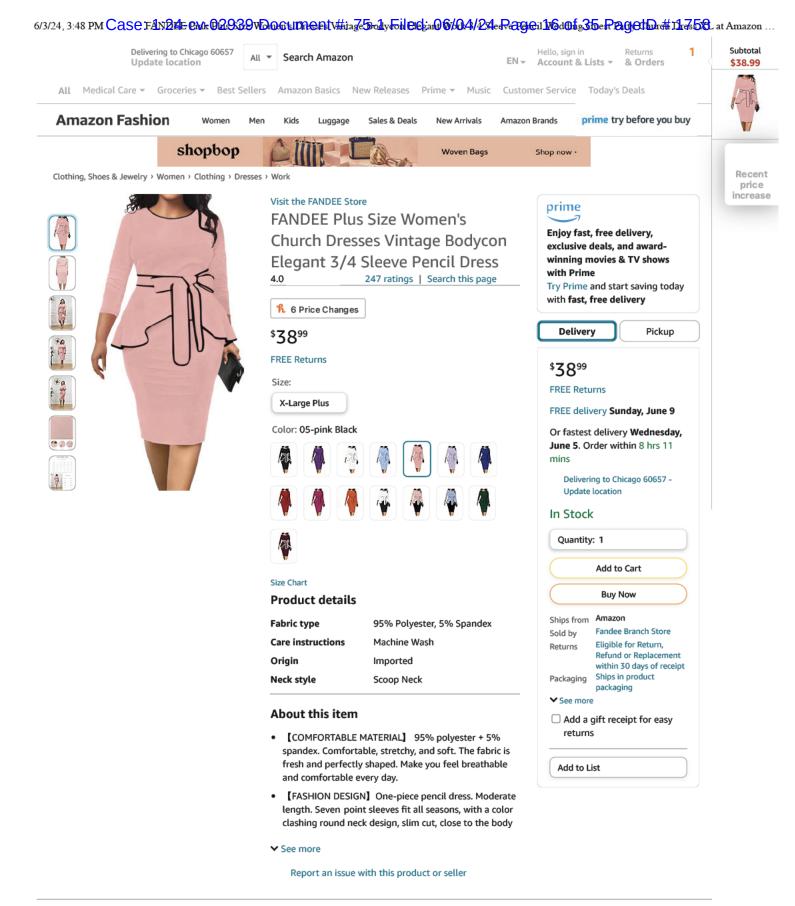
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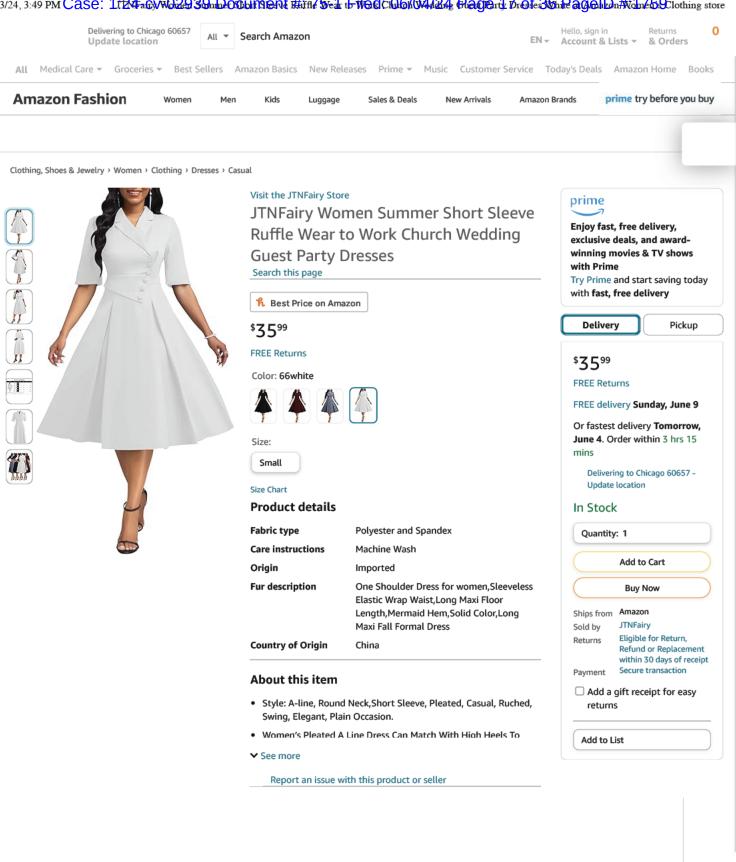
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\$15.13



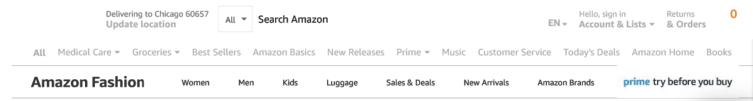
Styling ideas

Page 1 of 5



Sponsored

Styling ideas



Clothing, Shoes & Jewelry > Women > Clothing > Dresses > Casual



Visit the LaiviVic Store

LaiyiVic Maxi Dress for Women Casual Long Dress Colorful Print Round Neck Short Sleeve Summer Dress with Pockets

3.7 70 ratings | Search this page

R Best Price on Amazon

\$35⁹⁹

FREE Returns
Join Prime to buy this item at \$32.39

Size:

X-Large

Color: Color11337-1











Size Chart

Product details

Fabric type Polyester and Spandex
Care instructions Hand Wash Only
Origin Imported
Closure type Pull On
Country of Origin China

About this item

- · Comfy polyester and spandex, soft and comfortable
- Features: Short sleeve, Casual Long beach dress, Maxi dress with Pockets, Loose fit. It is so pretty, hangs well, flattering and can be dressed up or down.
- African print dress perfect for busty ladies and women,plus size

✓ See more

Report an issue with this product or seller

Similar item with fast delivery



FANDEE Plus Size Maxi Dress for Women Casual Summer Sundress V Neck 3/4 Sleeve (11280) \$39.99

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Delivery

Pickup

\$3599

FREE Returns

FREE delivery Sunday, June 9

Or fastest delivery **Wednesday, June 5**. Order within 5 hrs 29 mins

Delivering to Chicago 60657 -Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

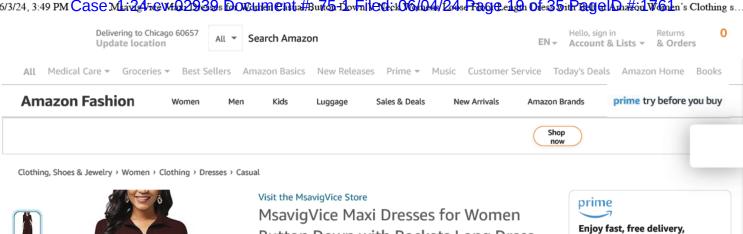
Ships from Amazon Sold by LaiyiVic

Eligible for Return, Refund or Replacement within 30 days of receipt

Packaging Ships in product packaging

✓ See more

 Add a gift receipt for easy returns





Button Down with Pockets Long Dress Casual V Neck Floral Print Loose Prom **Dresses Outfits**

4.1 1,875 ratings | Search this page

R Best Price on Amazon

\$3799

FREE Returns

Size: Medium



Size Chart

Product details

Fabric type Polyester and Spandex

Care instructions Machine Wash Origin Imported

Closure type Pull On **Country of Origin** China

About this item

- · Features: Shirt Collar, Long Sleeve, Button Down, with Belt, Floral Print, Big Swing, Long Maxi Shirt Dress, African Ethnic Print, Long sleeve maxi dress makes you more charming
- · Match:Pair this dress with flats for a casual look or pair it with heels and long necklace on date night. Also, it perfect for Merry Christmas season

✓ See more

Report an issue with this product or seller

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Delivery

Pickup

\$3799

FREE Returns

FREE delivery Sunday, June 9

Or fastest delivery Friday, June

7. Order within 13 hrs 44 mins

Delivering to Chicago 60657 -**Update location**

Only 1 left in stock - order soon.

Add to Cart

Buy Now

Amazon Ships from

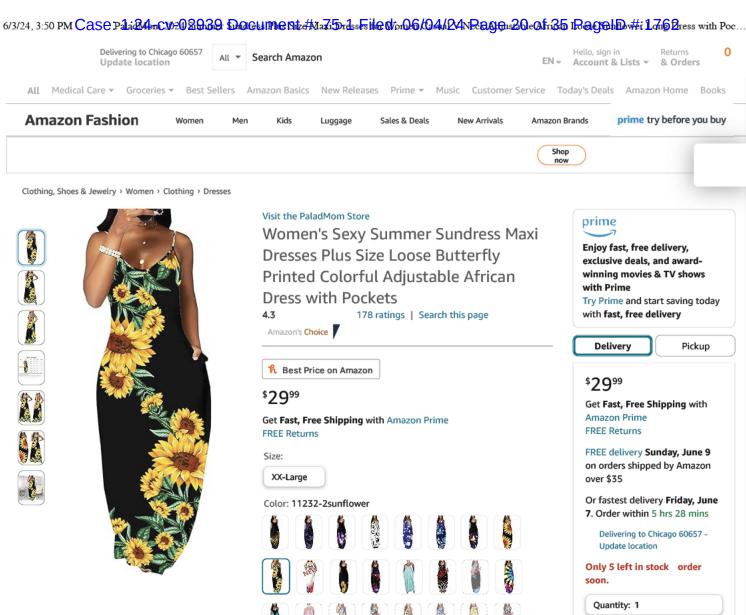
MsavigVice Sold by Eligible for Return. Returns

Refund or Replacement within 30 days of receipt

Ships in product Packaging packaging

✓ See more

☐ Add a gift receipt for easy returns



Size Chart

Product details

Fabric type [Fabric]: This sexy elegant plus size sunflower slip dress is made of premium polyester and spandex, brand new high-quality

fabrics, well-made not see-through, and very curvy, breathable to skin, can be easily dressed up and down, show your perfect

shape.

Machine Wash Care instructions

Origin Imported

[Design]: This fashion sexy elegant loose Fur description plus size sunflower slip dress made of with high quality and unique design, spaghetti

strapdesign, sleeveless, two side pockets, loose fit, this cute long jumpsuits/comfy rompers for women/one piece lounge wear

✓ See more

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Buy Now Amazon

Eligible for Return,

Ships in product

packaging

☐ Add a gift receipt for easy

Refund or Replacement within 30 days of receipt

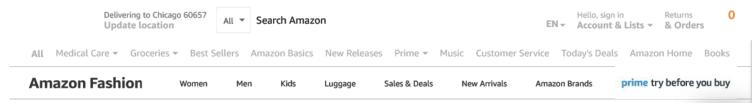
Ships from Sold by

Returns

Packaging

See more

returns



Clothing, Shoes & Jewelry > Women > Clothing > Dresses > Work



Visit the SeNight Store

SeNight Women's Dress Bodycon Church Dress Elegant Work Pencil Dress

330 ratings | Search this page

R Best Price on Amazon

\$2999

Get Fast, Free Shipping with Amazon Prime

FREE Returns

Size:

Color: Blue-a



Size Chart

Product details

Fabric type 95% Polyester, 5% Spandex

Origin Imported

Fur description Made of soft surface, light and

comfortable.

Closure type Pull On
Country of Origin China

About this item

- This business work dress Size: there are 5 sizes for your choose:
 Small,Medium,Large,X Large,XX Large,please refer to the chearly size datas on below description page before ordering.
- Elegant and striking,a work dress half ruffles,bow tie, mini length style, suit for business work casual, party, club, etc wear.

✓ See more

Report an issue with this product or seller

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Delivery

Pickup

\$2999

Get Fast, Free Shipping with Amazon Prime FREE Returns

FREE delivery June 22 - July 7 on orders shipped by Amazon over \$35

Or fastest delivery June 20 - July 3

Delivering to Chicago 60657 -Update location

Quantity: 1

Add to Cart

Buy Now

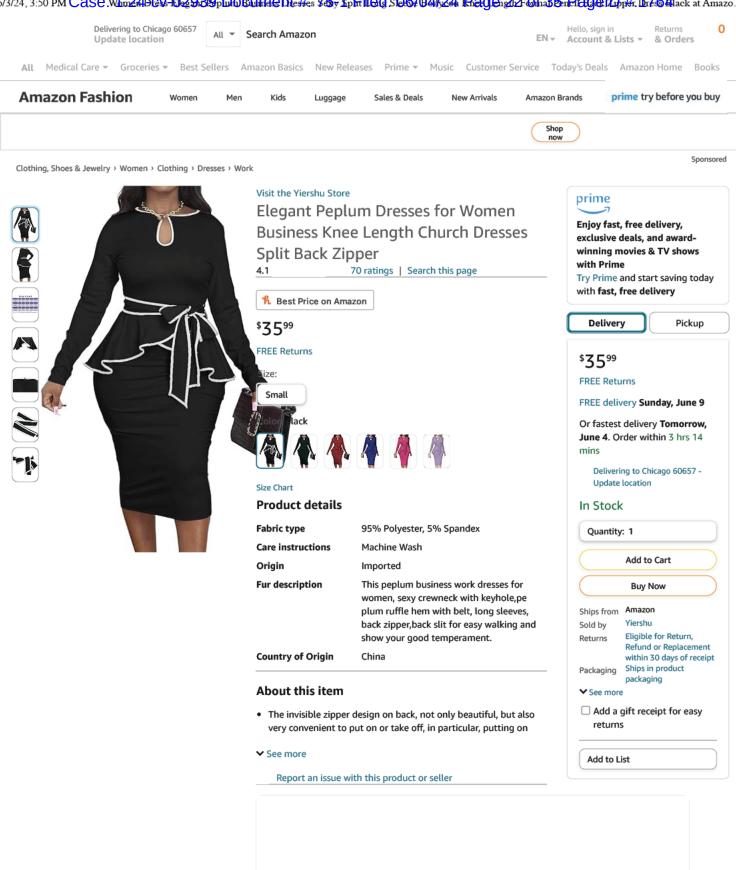
Ships from Amazon
Sold by SeNight

Returns Eligible for Return, Refund or Replacement

within 30 days of receipt
Packaging Ships in product
packaging

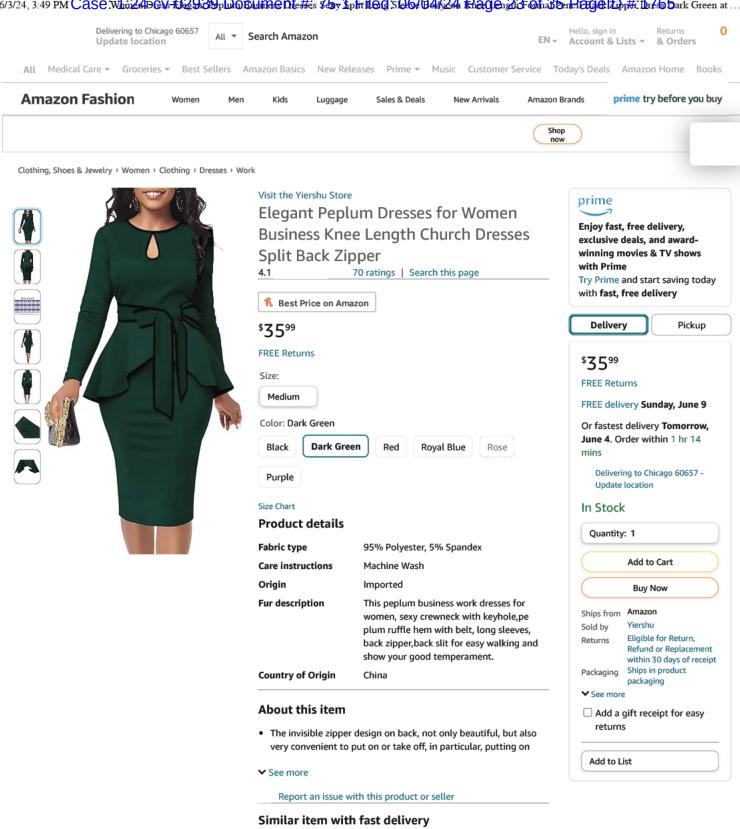
✓ See more

 Add a gift receipt for easy returns



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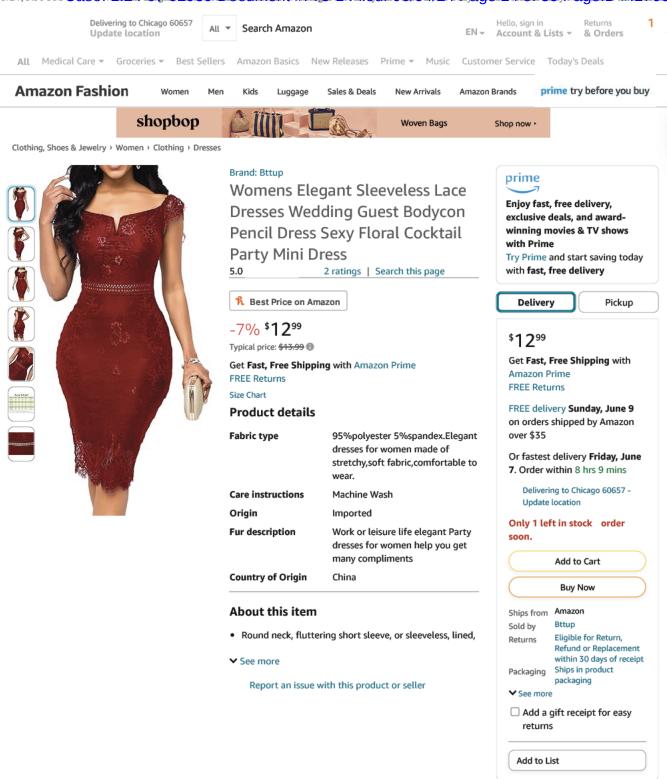
Styling ideas



Elegant Church Dress for Women Vintage Short Ruffle

Sleeve Bodycon Dresses wear to Work (13)

\$30.99

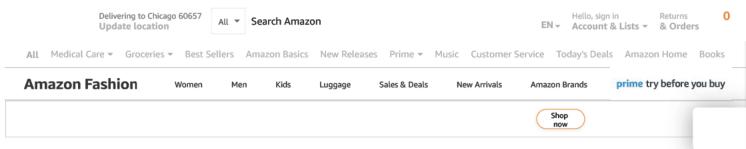


Styling ideas

Page 1 of 5

Subtotal

\$38.99



Clothing, Shoes & Jewelry > Women > Clothing







Visit the Yiershu Store

Yiershu Women's Casual Summer Dresses Sexy Shoulder Strap Loose Long Floor Length Sleeveless Print Sundresses

4.4 26 ratings | Search this page

R Best Price on Amazon

\$29⁹⁹

Get Fast, Free Shipping with Amazon Prime

FREE Returns

Size:

Medium

Color: Pink/Flower





Size Chart

Product details

Fabric type 95% Polyester, 5% Spandex

Care instructions Hand Wash Only

Origin Imported

Fur description 95% Polyester, 26% Spandex

Country of Origin China

About this item

- Features:Crewneck,Sleeveless,Adjustable shoulder strap,Fashion print,Loose Style,Summer beach dress,Bohemian long maxi dress with pockets.Flattering enough, Flowy and Swing,Sexy and Stylish.
- Design:Plus Size Dresses,Flowy Fashionable Beach Dresses,Cover Up Sundress.Relax Wear Maxi Dress.Loose and Wide Hem.Cami

✓ See more

Report an issue with this product or seller

Similar item with fast delivery



Yiershu Women's Casual Summer Dresses Sexy Shoulder Strap Loose Long Floor Length Sleeveless **Print Sundresses**

prime

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Try Prime and start saving today with fast, free delivery

Delivery

Pickup

\$2999

Get Fast, Free Shipping with Amazon Prime **FREE Returns**

FREE delivery Sunday, June 9 on orders shipped by Amazon over \$35

Or fastest delivery Wednesday, June 5. Order within 13 hrs 44

Delivering to Chicago 60657 -**Update** location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon Yiershu Sold by

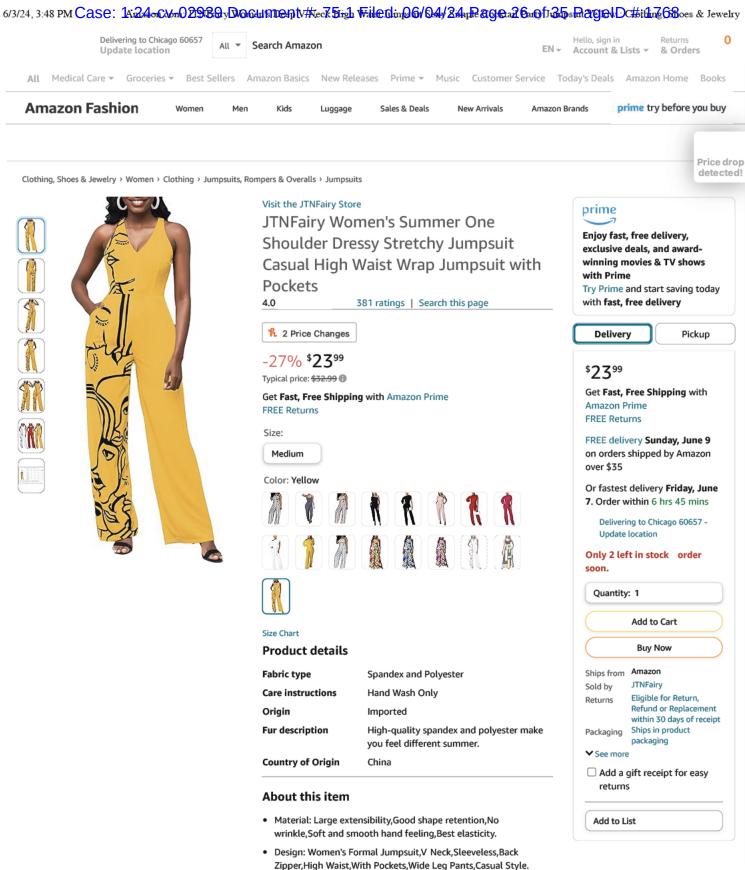
Eligible for Return, Returns Refund or Replacement within 30 days of receipt

Ships in product Packaging packaging

✓ See more

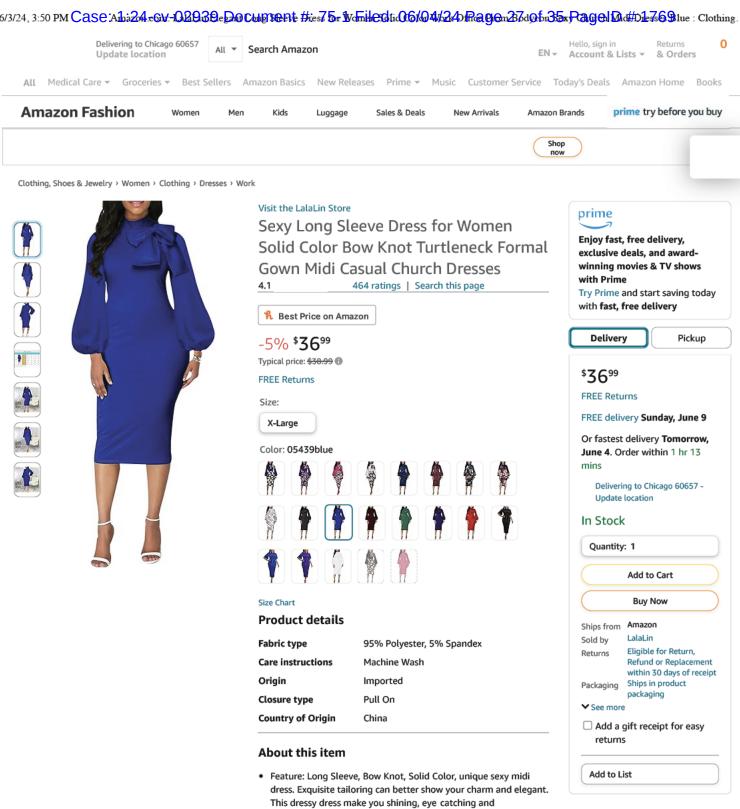
☐ Add a gift receipt for easy returns

Add to List



✓ See more

Report an issue with this product or seller

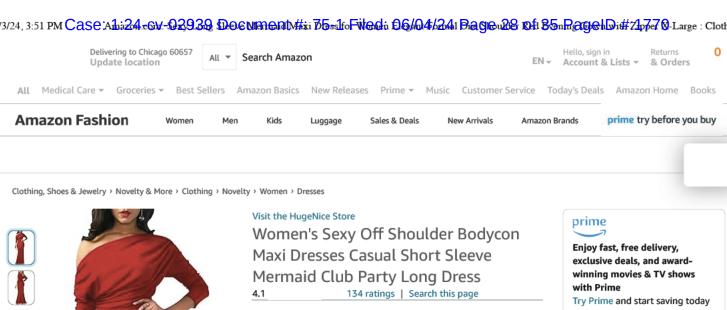


outstanding.

✓ See more

· Breathable & Stretched Material: This Sexy Long Sleeve Dress for women is made of high quality fabric that contains premium

Report an issue with this product or seller





1 Price Change

\$4499

FREE Returns

Size:

X-Large



Product details

Fabric type

[Fabric]: This elegant formal mermaid evening gown made of high-quality polyester and spandex, not see-through, soft to the touch, comfortable to wear.

Care instructions

Machine Wash

Origin

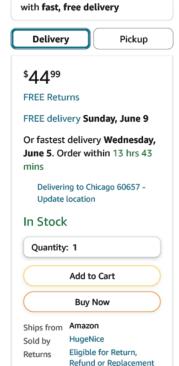
Imported

Fur description

[Design]: This sexy long sleeve one shoulder maxi dresses,long sleeve, offshoulder design, V-shaped backless design on the back, and a hidden zipper design on the back, which is easy to put on and take off, the skirt of the long evening dress is a mermaid design, the skirt The length allows you to wear high heels and mop the floor. It can make you more elegant and

See more

Report an issue with this product or seller



within 30 days of receipt

Ships in product

packaging

☐ Add a gift receipt for easy

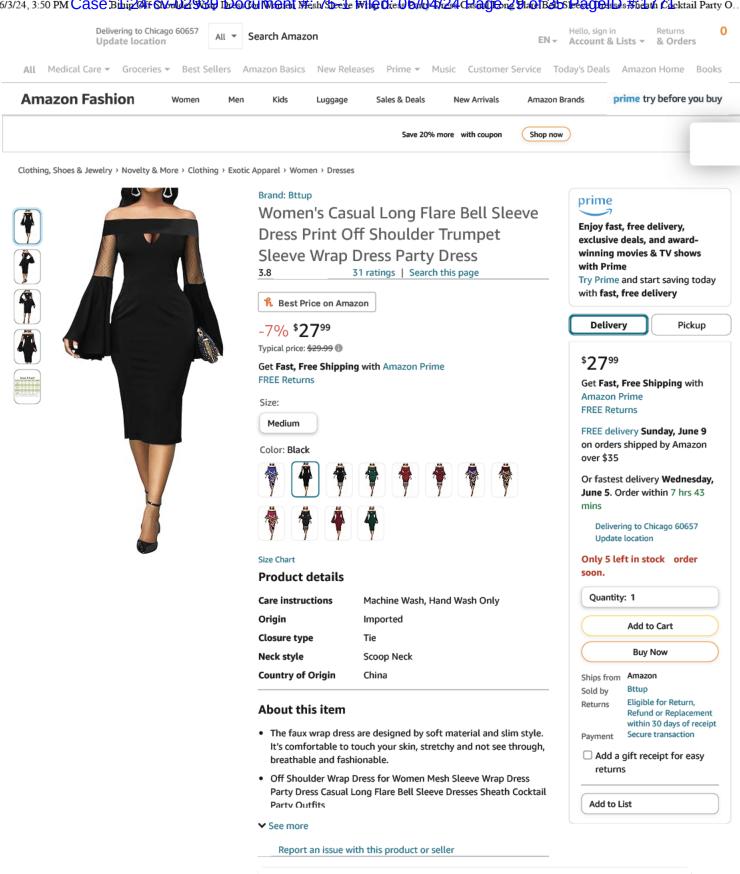
Packaging

✓ See more

returns

Add to List

Sponsored



Sponsored



Details for Order #111-0277422-5569073

Print this page for your records.

Order Placed: June 3, 2024

Amazon.com order number: 111-0277422-5569073

Order Total: \$484.27

Not Yet Shipped

Items Ordered 1 of: JTNFairy Women Summer Short Sleeve Ruffle Wear to Work Church Wedding Guest Party Dresses White	Price \$35.99
Sold by: JTNFairy (seller profile) Product question? Ask Seller	
Supplied by: Other	
Condition: New	
1 of: Yiershu Women's Casual Sexy Summer Print Bodycon Long Suspender Maxi Dresses Floor Length Sleeveless Plus Size Sundresses(Pink Flower,M)	\$29.99
Sold by: Yiershu (seller profile)	
Supplied by: Other	
Condition: New	
1 of: Womens Elegant Sleeveless Lace Dresses Wedding Guest Bodycon Pencil Dress Sexy Floral Cocktail Party Mini Dress	\$12.99
Sold by: Bttup (seller profile)	
Supplied by: Other	
Condition: New	
1 of: Bttup Off Shoulder Wrap Dress for Women Mesh Sleeve Wrap Dress Party Dress Casual Long Flare Bell Sleeve Dresses	\$27.99
Sheath Cocktail Party Outfits Black	
Sold by: Bttup (seller profile)	
Supplied by: Other	
Condition: New	
1 of: JTNFairy Women's Deep V Neck High Waist Jumpsuit Sexy Simple Cocktail Party Jumpsuit Yellow Sold by: JTNFairy (seller profile) Product question? Ask Seller	\$23.99
Supplied by: Other	
Condition: New	
1 of: PaladMom 2024 Summer Sundress Plus Size Maxi Dresses for Women Casual V Neck Adjustable African Loose Sunflower	\$29.99
Long Dress with Pockets	
Sold by: PaladMom (seller profile)	
Supplied by: Other	
Condition: New	
1 of: Sexy Long Sleeve Mermaid Maxi Dress for Women Elegant Formal One Shoulder Red Evening Gown with Zipper X-Large	\$44.99
Sold by: HugeNice (seller profile)	
Supplied by: Other	
Condition: New	
1 of: LaiyiVic Maxi Dress for Women Casual Long Dress Colorful Print Round Neck Short Sleeve Summer Dress with Pockets	\$32.39
Black X-Large	
Sold by: LaiyiVic (seller profile)	
Supplied by: Other	

Condition: New

1 of: IbuduSexy Half Sleeve Dress Color Block Casual Crew Neck Church Dresses for Women with Belt Black

\$25.99

Sold by: IbuduSexy (seller profile)

Supplied by: Other

Condition: New

1 of: Pencil Dress for Women Bodycon Elegant Off Shoulder Long Bell Sleeve Vintage Sheath Dresses with Zipper

\$30.99

Sold by: MOJICK (seller profile)

Supplied by: Other

Condition: New

1 of: SeNight Women's Dress Work Business Church Dresses Bodycon Half Ruffles Sleeve Round Neck Blue Floral Pencil Dresses \$29.99 with Bow Tie

Sold by: SeNight (seller profile)

Supplied by: Other

Condition: New

1 of: MsavigVice Maxi Dresses for Women Casual Button Down V Neck Womens Loose Floor Length Dress with Belt

\$37.99

Sold by: MsavigVice (seller profile)

Supplied by: Other

Condition: New

1 of: Women's 2 Piece Business Skirt Suit Casual Black Blazer Jackets and Pencil Midi Skirt Work Professional Sets with Buttons \$39.99

Sold by: MOJICK (seller profile)

Supplied by: Other

Condition: New

1 of: Women Dress Elegant Peplum Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper \$35.99

Dress White

Sold by: Yiershu (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

FREE Prime Delivery

Payment information

Payment Method: Item(s) Subtotal: \$439.26 Visa ending in 8357 \$0.00

Shipping & Handling:

\$439.26

Billing address Lilly O'Dea

Total before tax: Estimated tax to be collected:

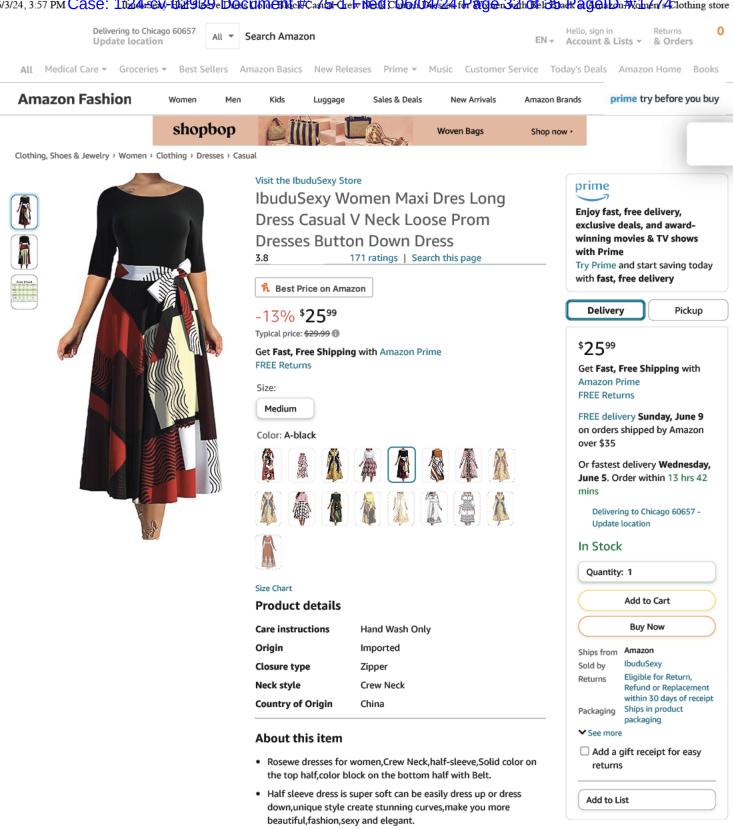
\$45.01

CHICAGO, IL 60613-5656

United States

Grand Total: \$484.27

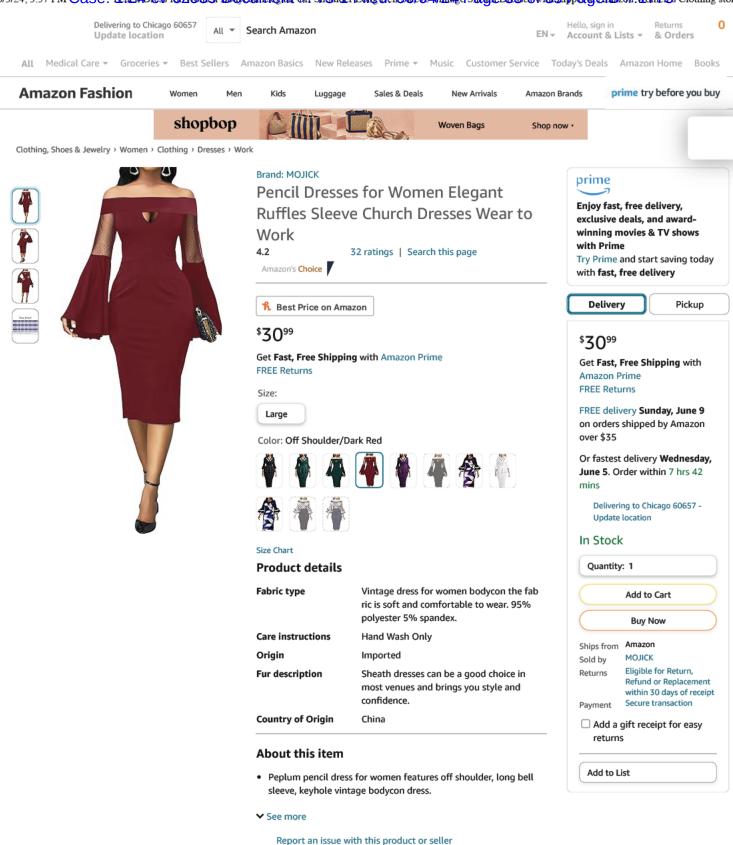
To view the status of your order, return to Order Summary.



See more

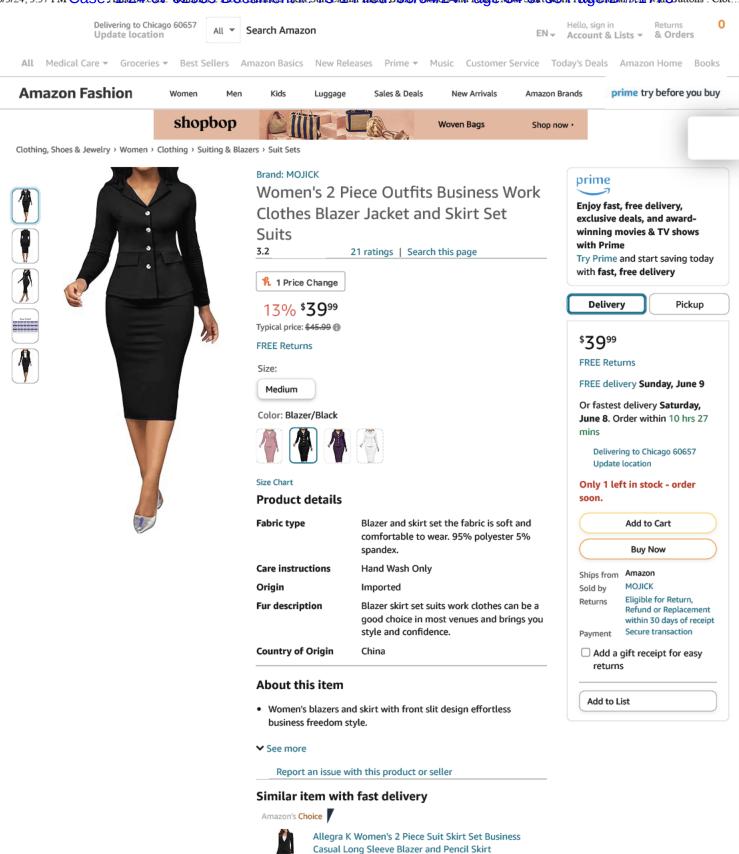
Report an issue with this product or seller

Styling ideas



Styling ideas

Page 1 of 5



(84)

\$55.99

Buy it with



Details for Order #111-7971689-6545847

Print this page for your records.

Order Placed: June 3, 2024

Amazon.com order number: 111-7971689-6545847

Order Total: \$123.45

Not Yet Shipped

Items Ordered Price

1 of: LalaLin Elegant Long Sleeve Dress for Women Solid Color Work Office Prom Bodycon Sexy Church Midi Dresses Blue

\$36.99

Sold by: LalaLin (seller profile) Supplied by: Other

Condition: New

1 of: Women Dress Elegant Peplum Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper \$35.99

Dress Dark Green Sold by: Yiershu (seller profile)

Supplied by: Other

Condition: New

1 of: FANDEE Pink Plus Size Women's Dresses Vintage Bodycon Elegant Work 3/4 Sleeve Pencil Wedding Guest Party Church \$38.99

Dress XL

Sold by: Fandee Branch Store (seller profile)

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656 **United States**

CHICAGO, IL 60613-5656

Shipping Speed:

Rush Shipping

yment i	

Payment Method: Item(s) Subtotal: \$111.97 Visa ending in 8357 Shipping & Handling: \$2.99 Free Shipping: -\$2.99

Billing address Lilly O'Dea Total before tax: \$111.97

> Estimated tax to be collected: \$11.48

United States **Grand Total:** \$123.45

To view the status of your order, return to Order Summary.

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EXHIBIT 2

ORDER PLACED May 26, 2024 TOTAL \$19.85 SHIP TO Lilly O'Dea Y ORDER # 111-0460485-9319431

View order details View invoice

Arriving June 6 - June 18

Shipped



Women Solid Swimsuit Easter Day St. Patrick's Day Independence Day 2024 Flyaway Tankini Navy Swimsuit Baseball Hat Big Swim for Women Petite Tankini Swimsuits for Women



Buy it again

Track package

Return or replace items

Share gift receipt

Leave seller feedback

Write a product review

Archive order

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ORDER PLACED TOTAL SHIP TO

ORDER # 111-8322209-4149042

May 26, 2024 \$30.67 Lilly O'Dea > View order details View invoice

Arriving June 6 - June 18

Shipped



Womens Plus Size Summer Dress Formal Wedding Lace Stitching Floral Ruffle Short-Sleeved Strapless Prom Dress Wedding Dress



Buy it again

Track package

Return or replace items

Leave seller feedback

Write a product review

Archive order

ORDER PLACED

TOTAL

SHIP TO

May 26, 2024 \$28.65

Lilly O'Dea Y

ORDER # 111-8233301-9818664

View order details View invoice

Arriving Jun 13 - Jul 5



PaladMom Casual Sleeveless Long Maxi Dresses Sundress for Women Summer Plus Size V Neck Loose Adjustable African Floral Printed Dress with Pockets



Buy it again

Track package

View or edit order

Archive order

ORDER PLACED May 26, 2024

TOTAL

SHIP TO

\$32.07 Lilly O'Dea ~

ORDER # 111-3188129-9066667

View order details View invoice

Delivered May 27

It was handed directly to a receptionist or someone at a front desk. Signed by: Front desk

Track package

Case: 1:24-cv-02939 Document #: 75-2 Filed: 06/04/24 Page 4 of 4 PageID #:1781

Arriving June 7 - June 18

Shipped



Women's Button Patchwork 2023 Casual Tops Long Sleeve V Neck Womens Square Neck Tank Tops Long Sleeve Jumpers for Women Women's Sweatshirts Plus Size (4-Red,X-Large)



Buy it again

Track package

Return or replace items

Share gift receipt

Leave seller feedback

Write a product review

Archive order

ORDER PLACED

TOTAL

SHIP TO

May 26, 2024

\$83.17

Lilly O'Dea ~

ORDER # 111-1984552-8520260

View order details View invoice

Arriving June 6 - June 18

Shipped

Lace Floral A Line Ruffle Short Sleeve Plus Size Maxi Dress Elegant Classy Prom Evening Cold Shoulder Flowy Swing Solid Color Loose Fitting Cut Out Mother of The Bride Dresses(B Blue,X-Large)

Return items: Eligible through July 6, 2024

FQZWONG Summer Tops for Women, Fashion 2022 Casual Short Sleeve Flower Print Button up V Neck Pleated Flowy Swing Boho Tops Hawaiian Henley Shirts Blouses T-Shirts Going Out Tops (B Black, Small)

Return items: Eligible through July 6, 2024

Sequin Dress for Women Elegant Bodycon Dress Plus Size Sexy Prom Party Club Formal Gowns and Evening Dresses Wedding Guest Dress Fashion Solid Puff Sleeve Mini Pencil Dress(B Black,X-Large)

Track package

Return items

Share gift receipt

Leave seller feedback

Write a product review

EXHIBIT 3

Order #111-3188129-9066667 Defendant 51, Tang jian



IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

HONG KONG LEYUZHEN TECHNOLOGY CO., LTD,

Plaintiff,

٧.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE "A" HERETO,

Defendants.

Case No. 1:24-CV-02939-MFK-BWJ

Honorable Matthew F. Kennelly

Magistrate Beth W. Jantz

SUPPLEMENTAL DECLARATION OF LIANGJIE LI IN SUPPORT OF PLAINTIFF'S REPLY IN SUPPORT OF REVISED MOTION FOR PRELIMINARY INJUNCTION

- I, Liangjie Li, of Hong Kong, a special administrative region of the People's Republic of China, declare as follows:
- 1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.
- 2. I make this supplemental declaration in support of Plaintiff's Reply in Support of Revised Motion for Entry of a Preliminary Injunction (the "Reply").
- 3. I am the Chief Operations Officer for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff markets and sells women's clothing and related items under the "Rotita" brand name ("Rotita").

5. Rotita is an extremely well-known source of women's clothing in the United States and has been the subject of rampant counterfeit sales through online platforms such as Amazon, Walmart, Aliexpress, eBay, Walmart, and Alibaba. These are the six largest online retailers in the World – and Plaintiff does not sell its products through any one of them. Rather, Plaintiff only sells its genuine Rotita brand products through its website rotita.com.

- 6. Plaintiff's rough estimated gross revenue from United States sales likely exceeds \$20,000,000 USD per year. Of this amount, Plaintiff roughly estimates that over \$1,000,000 is derived from sales in the State of Illinois. Moreover, Plaintiff spends roughly anywhere from \$8,000,000 to \$12,000,000 USD each year to specifically advertise its Rotita brand in the United States through such online advertising sources as Google Ads, Facebook, and Bing. Furthermore, the company has spent more than \$80,000 in filing fees paid to the United States Copyright Office just to secure registration of copyright protected works being asserted in eleven (11) enforcement actions initiated in this judicial district. Simply put, Plaintiff is an extremely successful company that earns millions of dollars from product sales in the United States including within the State of Illinois. To do so, Plaintiff annually spends tens of millions of dollars advertising in the United States to promote the sale of its brand.
- 7. The defendants named in the company's copyright infringement enforcement actions are engaged in the practice of copying Plaintiff's copyright protected product images almost instantaneously after they are first displayed on the company's website and then associating these images with sale and promotion of unauthorized, counterfeit products of substandard quality, thereby deceiving consumers including the citizens of the State of Illinois. Moreover, given the

nature of Plaintiff's goods, such large-scale sales operations over multiple online retail platforms require considerable supply chain coordination that could not reasonably be accomplished independently by any of the named Defendants. Accordingly, Defendants are believed to be acting in concert as part of a larger counterfeit products syndicate.

- 8. Defendants have directly targeted their counterfeit sales activities, through online sales platforms not utilized by Plaintiff, in the United States, including to the residents of the State of Illinois, through, at least, fully interactive, e-commerce stores operating under their designated aliases on the Amazon platform.
- 9. Defendants in this action have continued to sell counterfeit Rotita brand products on Amazon.com. Plaintiff performed a cursory investigation for any additional counterfeit products being offered for sale on the Amazon.com platform by any of the Represented Defendants. Plaintiff's investigation revealed that ten (10) of the Represented Defendants were operating additional stores on Amazon.com that used, at least, misappropriated copyright protected images that infringe six (6) federally registered copyrights in connection with the sale of counterfeit Rotita brand products. In addition, six (6) more of the Represented Defendants were displaying misappropriated, unregistered copyrighted protected images on their Amazon.com online storefronts to advertise the sale of counterfeit Rotita products. Attached as Exhibit "1" is a true and correct copy of a document summarizing the copyright registration numbers owned by Plaintiff, the copyright protected images, the link to Defendant's infringing image being used to sell counterfeit products on Amazon.com, and a picture of the unauthorized, copyright image being displayed on Defendants' online store fronts. Exhibit "1" also contains a list of the same information for the unregistered, copyright protected works owned by Plaintiff.

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10. Plaintiff has secured the services of two proprietary software programs capable of

tracking the online sales activity for those offering identified products through Amazon and other

related online platforms. This has resulted in nothing short of startling results. For instance, where

a majority of the currently appearing Defendants have claimed zero infringing sales, Plaintiff's

employment of the proprietary software products has revealed that Defendants have likely sold in

far excess of \$10,000,000 in counterfeit Rotita brand products.

11. Plaintiff has provided its counsel with a copy of the search results for United States

sales for each of the Defendants appearing through counsel in this case.

12. Plaintiff expects to earn a net profit of approximately 30% on the sale of its Rotita

brand products. This figure, however, includes substantial advertising expenses that Defendants

would not have to pay since they are largely capitalizing on Plaintiff's advertising efforts by

misappropriating its copyright protected images and imbedding the term "Rotita" in their

Amazon.com search engine optimization. Doing so causes their online stores to be displayed

whenever someone searches for "Rotita" on Amazon.com despite Plaintiff not selling authentic

"Rotita" brand products on the platform. Based on the foregoing, I would estimate that Defendants'

online stores operate at a net profit of between 40% to 50%. I believe that a disgorgement of

Defendants' profits would fall within the net profit range.

I declare under penalty of perjury under the laws of the United States of America the

foregoing is true and correct.

Executed on June 4, 2024, in Hong Kong.

By: Liangjie Li LIANGJIE LI

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of June 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email and by posting the filing URL contained on our website https://blointernetenforcement.com/, and distributed to ecommerce platform, Amazon.

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Bar No. 6299408) BAYRAMOGLU LAW OFFICES LLC 1540 West Warm Springs Road Ste. 100 Henderson, NV 89014

Tel: (702) 462-5973 Fax: (702) 553-3404 shawnmangano@bayramoglu-legal.com *Attorneys for Plaintiff*

EXHIBIT 1

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seller_id	Store name	Link to Infringing Photo	Infringing Photo	Rotita's Product Link	Rotita's Copyrighted Photo	Copyright Registration No.	Available for purchase
A1EJYSF9JPAZ06	FANDEE Fandee Branch Store	https://www	A compared to the compared to		r rd r d	VA0002379888	YES
A22BX9TLZJO5TB	Runwind Runwind Fashion Clothing	NO					
A3IR1NFH8JGQWA	Nmoder	NO					
A2NMAMDS3PZON3	·	https://www	A second of the control of the contr		F d d d	NO	YES
A2NMAMDS3PZON3			And Andrew Control of the Control of			NO	YES
A3QVYLMNMAQLND	TDiooCor	NO					
A8W6GPHZXI613	LaiyiVic	https://www	A state of the sta	https://www.ro	vitia.com/geometric-print-bib-neck-red-maxi-dr	« NO	YES
A2GLF86WHN3Y80	Generic	NO	Tanacamony by position in 1 yst-1		received by the content of the conte	1	
	Glozeplus MsavigVice		An analysis of the Annual Section of the Ann	https://www.	titia.com/turndown-collar-long-sleeve-belted-sl	n NO	YES
A3NLWIN351W45P	Sexycherry	NO	v.amazon.com/up/ poarz/1f/N/Q/psc=1	nitps://www.ro	rata.com/turnuown-collar-long-sleeve-delted-sl		1E3

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seller_id	Store name	Link to Infringing Photo	Infringing Photo	Rotita's Product Link	Rotita's Copyrighted Photo	Copyright Registration No.	Available for purchase
A1VG2FFJHUNFR9	SeNight	https://www.h	A Secretary of the Secr		r rdr r	NO	YES
A3KIBA8IARH7I8	SxClub	NO	V.amazon.com/up/bobPts171Wi?pst=1		1 101 1	NO	TES
AWMWRV0TMJ2ZJ	Yiershu	httns://www	A management of the land to th		r rd r d	VA0002379888	YES
AWMWRV0TMJ2ZJ	Yiershu	https://www	AND SOURCES OF OF THE PROPERTY		r rd r d	VA0002379888	YES
AWMWRV0TMJ2ZJ	Yiershu		The state of the s				
A2YOCBRYTTNUE2	VisiChenup	NO	v.amazon.com/dp/B0C2K1YDB3?psc=1		raa	VA0002379911	YES
A3HG8U0ST1MM3H			In an analysis of the second s		r d d	NO	YES
A2V0GGS1757V6A	PerZeal	NO	- S		. u u		ILJ
A183295JQ6L5VE	LalaLin		The second of th				
A 41 HA 412 DVC: 2 2 2	Waita I		v.amazon.com/dp/B09ZGVLLCZ?psc=1	https://www.ro	otita.com/l Japan oyal-bl	NO	YES
A1UIMIRPXFI0Q1 A37TFKY0PF5Y3Q	Yajedo Angerella Fa	NO NO		-		-	

Case: 1:24-cv-02939 Document #: 76-1 Filed: 06/04/24 Page 4 of 5 PageID #:1792

seller_id	Store name	Link to Infringing Photo	Infringing Photo	Rotita's Product Link	ootita's roduct Link		Available for purchase
A12Q5M9I186LO2	Bttup	https://ww	The second of th		r	NO	YES
A12Q5M9I186LO2	Bttup	https://ww	And the second s			VA0002379911	YES
A33LCCVQ65LYQC	HugeNice		A second control of the control of t				YES
A33LCCVQ65LYQC	HugeNice		W.amazon.com/dp/B0BRR7MS6R?psc=1			NO	YES
A174G6F7YQMKO9	TieBnss	NO	waniazun.cumyup/ bubhn/ ivisuh: psc-1		<u> </u>	INC	163
A1856U6J8MHWFG	IbuduSexy		An international of the foliage of t				
A3LI8RLL84XB8N	MOJICK		w.amazon.com/dp/BOBVM2VISC?psc=1 ***The state of the st	https://www.ro	tita.com/belted-geometric-print-red-3-4-sleeve		YES

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seller_id	Store name	Link to Infringing Photo	Infringing Photo		Rotita's Product Link	Rotita's Copyrighted Photo	Copyright Registration No.	Available for purchase
A3LI8RLL84XB8N	молск	https://www	Colony to war war of the war of	MINISTRATION TO A TOTAL TO A TOTA		r	VA0002384827	YES