

**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-02825-EEB-SMF

Honorable Judge Elaine E. Bucklo

Magistrate Sheila M. Finnegan

ORDER FOR PRELIMINARY INJUNCTION AND TO UNSEAL CASE

1. THIS CAUSE being before the Court on Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, ("Plaintiff") Motion for Entry of Preliminary Injunction ("Motion") and this Court having heard the evidence before it, hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against those numbered defendants identified in the current Schedule A to the Complaint [Dockets], who operate fully interactive, e-commerce stores under the seller aliases identified in Schedule A (collectively, the "Seller Aliases") and attached hereto. The Court shall also unseal all previously sealed documents.

The Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendants because Defendants directly target their business activities toward consumers in the United States, including consumers in the State of Illinois. Specifically, PLAINTIFF has provided a basis to conclude that Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more seller

aliases, offer shipping to the United States, including to the State of Illinois, and have sold knockoff products through the unauthorized use and display of Plaintiff's federally registered copyrights (the "Plaintiff's Copyrights") to residents of the State of Illinois. Docket Nos. 1-1 and 8-1, Ex. 1 to the Complaint, which includes the twelve (12) copyrights associated with the Plaintiff's Copyrights, VA0002369378, VA0002379893, VA0002379895, VA0002379894, VA0002379907, VA0002379904, VA0002379881, VA0002379911, VA0002380492, VA0002380491, VA0002379930, VA0002379899.

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("TRO") should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff's previously granted Motion for Entry of a Temporary Restraining Order establishes that Plaintiff has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted. Specifically, Plaintiff has proved a prima facie case of copyright infringement because (1) Plaintiff is the lawful assignee of all right, title and interest in and to the federally registered copyright(s), (2) Defendants make, use, offer for sale, sell, and/or import into the United States for subsequent sale or use knock-off products that infringe directly and/or indirectly the Plaintiff's federally registered copyrights and (3) an ordinary observer would be deceived into thinking the Infringing Products were the same as Plaintiff's federally registered copyrights. Furthermore, Defendants' continued, and unauthorized use of Plaintiff's federally registered copyrights irreparably harms Plaintiff through loss of customers' goodwill and reputational harm. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law. Moreover, the public interest is served by entry of this

Preliminary Injunction to dispel the public confusion created by Defendants' actions. As such, this Court orders that

2. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be enjoined and restrained from:

a. using or displaying the Plaintiff's Copyrights, in any medium, whether it be print, digital or otherwise, in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Plaintiff's product or is not authorized by PLAINTIFF to be sold in connection with the Plaintiff's Copyrights;

b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Plaintiff's product or any other product produced by PLAINTIFF through the use or display of the Plaintiff's Copyrights;

c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control, or supervision of PLAINTIFF, or are sponsored by, approved by, or otherwise connected with PLAINTIFF;

d. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for PLAINTIFF, nor authorized by PLAINTIFF to be sold or offered for sale through the use or display of the Plaintiff's Copyrights; and

e. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.

3. Upon Plaintiff's request, any third party with actual notice of this Order who is providing services for any of the Defendants or in connection with any of Defendant's Online

Marketplaces, such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd.

("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), and Dhgate (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;

b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and

c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Alipay, Wish.com, Alibaba, Ant Financial, Amazon Pay, or other merchant account providers, payment providers, third party processors, credit card associations (e.g., MasterCard and VISA), including present balances on any accounts.

4. Upon PLAINTIFF's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 2, shall within ten (10) business days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants

in connection with the sale of counterfeit and infringing goods using the Plaintiff's Copyrights.

5. Defendants shall be restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

6. Any Third-Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within ten (10) business days of receipt of this Order:

a. locate all accounts and funds connected to Defendants' Seller Aliases, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in Exhibits, and any e-mail addresses provided for Defendants by third parties; and

b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

7. Plaintiff is authorized to issue expedited written discovery, pursuant to Federal Rules of Civil Procedure 33, 34, 36, and 45 related to:

a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;

b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and

c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or

participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, Temu.com, PayPal Inc. (“PayPal”), Alipay, ContextLogic Inc. d/b/a Wish.com (“Wish.com”), Alibaba Group Holding Ltd. (“Alibaba”), Ant Financial Services Group (“Ant Financial”), Amazon Pay, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

8. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, and the domain name registrars, including, but not limited to, GoDaddy Operating Company LLC, Name.com, PDR LTD. d/b/a/ PublicDomainRegistry.com, Cloudflare Inc, Oracle Corp., Amazon Inc., Alibaba Group d/b/a Alibaba Cloud.com, Namesilo, LLC d/b/a privacuguardian.org, and Namecheap Inc., within seven (7) calendar days of receipt of this Order or prior to the expiration of this Order, whichever date shall occur first, shall disable the Defendant Domain Names and make them inactive and untransferable until further order by this Court.

9. Plaintiff is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

10. Plaintiff may provide notice of these proceedings to Defendants, including notice of the preliminary injunction hearing, service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions by electronically publishing a link to the Complaint, this Order and other relevant documents on a website <https://blointernetenforcement.com/>, and by sending an e-mail to the e-mail addresses identified in Exhibits and any e-mail addresses provided for Defendants by third

parties that includes a link to said website. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendants receive from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.

11. Plaintiff has deposited with the Court ten thousand dollars (\$5,000.00), on July 29, 2024 Docket 24, as surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of wrongful restraint hereunder.

12. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and Northern District of Illinois Local Rules.

13. All previously sealed documents shall be unsealed, including Dockets 4, 8, 13 and 21.

14. This Preliminary Injunction without notice and order to unseal is entered at 3:00 p.m. on September 30, 2024 and shall remain in effect until Final Disposition of this case or until further order by the Court.



Honorable Elaine E Bucklo
United States District Judge

Defendant No.	Seller's Name Link Seller's Website
2	https://www.thousandfashion.com
3	https://sharmila800800.en.made-in-china.com
4	https://www.wowsheshop.com
5	https://www.shopemeryrose.com
7	https://www.oddprecious.com
13	https://www.wholesale7.net
14	https://www.ncocon.com
15	www.ninacloak.com
17	https://shopsampeel.com
19	www.justfashionnow.com
21	https://www.bellelily.com
22	https://www.evewholesale.com
24	https://www.promfy.com
27	https://www.global-lover.com
28	https://wanxywth.en.made-in-china.com
29	https://www.alelly.net
30	www.berrylook.com
31	https://es.emmiol.com
32	https://www.fortuncan.com
33	https://www.warmlily.com
34	https://www.fiercego.com

Defendant No.	Seller's Name Link Seller's Website
35	https://www.gracequeens.com
36	https://www.yuluosha.com
37	https://www.chictrendy.co.uk
39	https://orroshop.com
40	https://descuento-tienda.com
41	https://www.vangoghdress.com
42	https://www.fruugo.co.uk AND https://www.fruugonorge.com
43	https://voguisher.com
44	https://susan-julie.com
45	https://www.klassywear.com
46	www.cokement.com
47	https://nuolang2021.en.made-in-china.com
48	https://www.bmbridal.com
49	https://uquid.com [England]
50	https://keuunique.co.uk
51	https://amaioofficial.com
52	https://maria-gabriele.com
56	https://tove-kari.com [Norway]
59	https://www.glami.si
60	https://trgomania.com [Croatia]
64	https://www.ubuy.ci

Defendant No.	Seller's Name Link Seller's Website
65	https://www.ubuy.sv
66	https://www.ubuy.co.tz
67	https://m.dressfair.com
68	https://bahamas.desertcart.com
69	https://www.dfashionmagazine.com
70	https://www.bodegaurrera.com.mx [Mexico]
71	https://www.greenfashionn.com
74	https://urbanworldkart.com [India]
75	https://www.meesho.com
76	https://thewardrobes.uk
81	https://papsoo.ht
82	https://marimarshop.com
83	https://shoplazza.ru [Russia]