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

HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED,

Case No.:

Plaintiff,

COMPLAINT FOR COPYRIGHT

v.

INFRINGEMENT

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

JURY TRIAL DEMANDED

Defendants.

Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, ("Plaintiff"), by and through its counsel, the Bayramoglu Law Offices, LLC, submits the following Complaint against the individuals, corporations, limited liability companies, partnerships and unincorporated associations identified on Schedule "A" hereto (collectively "Defendants") and hereby alleges as follows:

NATURE OF THE ACTION

1. This action has been filed by Plaintiff to combat online copyright infringers who trade upon Plaintiff's reputation, goodwill and valuable copyrights consisting of images and 3-D artwork embodied in Plaintiff's Rotita brand product line (the "Asserted Brand") of women's apparel (the "Asserted Brand Copyrights"). Plaintiff publishes Asserted Brand Copyrights on an online storefront located at the company's website associated with its Asserted Brand. Defendants infringe the Asserted Brand Copyrights by publishing the copyrighted images and 3-D artwork on numerous fully interactive commercial eBay internet stores ("Defendants' Online Stores") on the online eBay platform identified on Schedule "A" (the "Online Platform"), and are using, without

authorization, the Asserted Brand Copyrights and derivates thereof, to sell and/or offer for sale "knock-off" products of inferior quality and at bargain basement prices.

- 2. Defendants likewise advertise, market, and/or sell their knockoff products embodying Plaintiff's Asserted Brand Copyrights by reference to the same photographs and 3-D artwork as genuine Asserted Brand products, which causes further confusion and deception in the marketplace. Unique identifiers common to Defendants' internet stores, such as design elements and similarities in Defendant's unlawful use of the Asserted Brand Copyrights, establish a logical relationship between them and suggest that Defendants' illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal counterfeiting operation.
- 3. Plaintiff is forced to file this action to combat Defendants' counterfeiting of Plaintiff's copyrights, as well as to protect unknowing consumers from purchasing knockoff products over the Internet. Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, and tarnishment of the Asserted Brand's reputation and goodwill because of Defendants' actions, and therefore seeks injunctive and monetary relief.

JURISDICTION AND VENUE

- 4. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Copyright Act, 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)–(b) and 28 U.S.C. § 1331.
- 5. This Court has jurisdiction over the unfair deceptive trade practices claim in this action that arise under the laws of the State of Illinois pursuant to 28 U.S.C. § 1367(a) because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.
- 6. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants, since each of the Defendants directly targets consumers in the United States, including those within the State of Illinois, through at least

the fully interactive commercial internet stores accessible through Defendants' Online Stores as identified in Schedule "A", which is attached hereto as Exhibit 2.

- 7. Specifically, Defendants are reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores through which residents can purchase inferior products that are advertised for sale using, without authorization, the Asserted Brand Copyrights. Each of the Defendants has targeted sales from Illinois residents by operating online stores that offer shipping to the United States, including to the State of Illinois, accept payment in United States currency, and, on information and belief, has used photographs and 3-D artwork protected by the Asserted Brand Copyrights to sell competing products of lesser quality to residents of the State of Illinois.
- 8. Each of the Defendants is committing tortious acts in the State of Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b)(2) and 1400(a) because Defendants have committed acts of copyright infringement in this judicial district, and do substantial business in the judicial district.

THE PARTIES

- 9. Plaintiff is a corporation organized under the laws of the People's Republic of China and is the owner of numerous federal copyright registrations issued by the United States Copyright Office that constitute the Asserted Brand Copyrights. Attached hereto as Exhibit 1 is a table summarizing true and correct three (3) federal copyright registrations information regarding the Asserted Brand Copyrights.
- 10. Plaintiff founded the Asserted Brand in 2009, which is dedicated to women's fashion apparel and serves consumers in the United States and throughout the world.
- 11. Between 2021 and 2022, Plaintiff designed, caused to subsist in material form, and first published the original protected Asserted Brand Copyrights on its website located at the company's designated website employing the Asserted Brand in its URL and over the years has

worked hard to establish success and recognition for high quality women's apparel internationally and in the U.S.

- 12. Plaintiff has expended substantial time, money, and other resources in developing, advertising, and otherwise promoting its Asserted Brand and, specifically, the Asserted Brand Copyrights. As a result, the Asserted Brand is widely recognized and exclusively associated by consumers, the public, and the trade as being quality products.
- 13. Plaintiff owns all rights, including without limitation, the rights to reproduce the Asserted Brand Copyrights in copies, to prepare derivative works based upon the copyrighted works, and to distribute copies of the copyrighted works to the public by sale or other transfer of ownership, or by rental, lease, or lending, the protected works.
- 14. Plaintiff has neither licensed nor authorized Defendants to use the Asserted Brand Copyrights and none of the Defendants are authorized retailers of Plaintiff's genuine Asserted Brand products.
- 15. Upon information and belief, Defendants are individuals and business entities who, upon information and belief, reside mainly in the People's Republic of China or Hong Kong. Defendants conduct business throughout the United States, including within the State of Illinois and in this judicial district, through the operation of Defendants' Online Stores identified in Schedule "A", and has offered to sell and, on information and belief, has sold and continues to sell counterfeit Asserted Brand products to consumers within the United States, including in the State of Illinois and in this judicial district, utilizing, without authorization, the Asserted Brand Copyrights.
- 16. Defendants go to great lengths to conceal their identities and the full scope of their operations making it virtually impossible for Plaintiff to learn Defendants' true identities and the exact interworking of their network.

DEFENDANTS' UNLAWFUL CONDUCT

- 17. The success of Plaintiff's Asserted Brand has resulted in counterfeiting and intentional copying of the company's products, and the sale and offering for sale of said products through the unauthorized use of the Asserted Brand Copyrights. Upon information and belief, Defendants conduct their illegal operations through commercial, online stores on the Online Platform. Each Defendant targets consumers in the United States, including in the State of Illinois, and sells and offers for sale counterfeit products through the unauthorized use of photographs and 3-D artwork protected by Asserted Brand Copyrights.
- 18. In similar cases involving multiple counterfeiters, defendants operating internet stores intentionally conceal their identities and the full scope of their counterfeiting operations to deter plaintiffs and Courts from learning their true identities and the full extent of their illegal counterfeiting operations.
- 19. In this case, through the unauthorized use of the Asserted Brand Copyrights on Defendants' Online Stores, Defendants are directly and personally contributing to, inducing and engaging in the infringement of the Asserted Brand Copyrights as alleged, often times as partners, co-conspirators and/or suppliers. Upon information and belief, Defendants are an interrelated group of counterfeiters working in active concert to knowingly and willfully use without authorization the Asserted Brand Copyrights, to manufacture, import, distribute, offer for sale, and sell competing inferior products.
- 20. Upon information and belief, and at all times relevant hereto, Defendants have had full knowledge of Plaintiff's ownership of the Asserted Brand Copyrights including its exclusive right to use and license the Asserted Brand and the goodwill associated therewith.
- 21. Plaintiff has identified numerous stores on the Online Platform, including Defendants' Online Stores, which are offering for sale, selling, and importing knockoff products to consumers in this judicial district and throughout the United States by using, without authorization, the Asserted Brand Copyrights. Infringers on e-commerce platforms such as Defendants' Online Stores are estimated to receive tens of millions of visits per year and to

generate over \$135 billion in annual online sales. According to an intellectual property rights seizures statistics report issued by the United States Department of Homeland Security, the manufacturer's suggested retail price ("MSRP") of goods seized by the U.S. government in fiscal year 2020 was over \$1.3 billion. Internet websites like Defendants' Online Stores are also estimated to contribute to tens of thousands of lost jobs for legitimate businesses and broader economic damages such as lost tax revenue every year.

- 22. On information and belief, Defendants set up seller accounts on the Online Platform using, without authorization, the Asserted Brand Copyrights so that they appear to unknowing consumers to be authorized online retailers of genuine Asserted Brand products. Defendants' Online Stores accept payment in United States currency via credit cards and PayPal.
- 23. On information and belief, Defendants deceive unknowing consumers by using Plaintiff's Asserted Brand Copyrights on Defendants' Online Stores without authorization to attract customers, and to sell counterfeit products resembling Asserted Brand products.
- 24. Defendants, in similar type of counterfeit cases, deceive unknowing consumers by using the infringed intellectual property as originally used in connection with the sale of genuine products, within the content, text, and/or meta tags of their websites to attract various search engines crawling the Internet looking for websites relevant to consumer product searches. Additionally, counterfeiters in similar type cases, use other unauthorized search engine optimization ("SEO") tactics and social media spamming so that the Defendants internet store listings show up at or near the top of relevant search results and misdirect consumers searching for genuine products. Further, counterfeiters utilize similar illegitimate SEO tactics to propel new domain names to the top of search results after others are shut down.
- 25. Here, a search for the Asserted Brand women's dresses on the Online Platform resulted in the unauthorized display of the Asserted Brand Copyrights being used to promote competing, inferior products. As such, Plaintiff also seeks to disable Defendants' Online Stores that are the means by which the Defendants use, without authorization, the Asserted Brand

Copyrights to continue to sell knockoff products to consumers in the State of Illinois and in this judicial district.

- 26. On information and belief, Defendants conceal their identities by using multiple fictitious names and addresses to register and operate a massive network of internet stores. It is common practice for counterfeiters to register accounts with incomplete information, randomly typed letters, or omitted cities or states; use privacy services that conceal the owners' identity and contact information; and regularly create new websites and online marketplace accounts on various platforms including Defendants' Online Stores listed in Schedule "A", which is attached hereto as Exhibit "2". Such internet store registration patterns are one of many common tactics counterfeiters use to conceal their identities, the full scope and interworking of their massive counterfeiting operation, and to avoid being shut down.
- 27. Upon receiving notice of a lawsuit, counterfeiters in similar cases will often register new domain names or online marketplace accounts under new aliases.¹ Counterfeiters also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border Protection. A 2021 U.S. Customs and Border Protection ("CBP") report on seizure statistics indicated that e-commerce sales accounted for 13.3% of total retail sales with second quarter of 2021 retail e-commerce sales estimated at \$222.5 billion.² In FY 2021, there were 213 million express mail shipments and 94 million international mail shipments. *Id.* Nearly 90 percent of all intellectual property seizures occur in the international mail and express environments. *Id.* at 27. The "overwhelming volume of small packages also makes CBP's ability to identify and interdict high risk packages difficult." *Id.* at 23.

¹ https://www.ice.gov/news/releases/buyers-beware-ice-hsi-and-cbp-boston-warn-consumers-aboutcounterfeit-goods-during (counterfeiters are "very adept at setting up online stores to lure the public intothinking they are purchasing legitimate good on legitimate websites") (last visited Apr. 6, 2022).

² U.S. Customs and Border Protection, Intellectual Property Right Seizure Statistics, FY 2021 (https://www.cbp.gov/sites/default/files/assets/documents/2022-Sep/202994%20-%20FY%202021%20IPR%20Seizure%20Statistics%20BOOK.5%20-%20FINAL%20%28508%29.pdf) at 23.

- 28. Further, counterfeiters often operate multiple credit card merchant accounts and third-party accounts behind layers of payment gateways so that they can continue operating in spite of enforcement efforts. Upon information and belief, Defendants maintain off-shore bank accounts and regularly move funds from their Online Platform accounts to off-shore bank accounts outside the jurisdiction of this Court particularly since it is believed that Defendants reside in the People's Republic of China or Hong Kong.
- 29. Defendants' unlawful use of Plaintiff's Asserted Brand Copyrights to promote knockoff products for sale on Defendants' Online Stores, bear similarities and indicia of interrelatedness, suggesting they are manufactured by and come from a common source. Notable features common to Defendants' Online Stores include lack of contact information, same or similar products for sale, identically or similarly priced items and sales discounts, shared hosting service, similar name servers, and their common infringement of Plaintiff's Asserted Brand Copyrights.
- 30. Defendants' use of Plaintiff's Asserted Brand Copyrights in connection with the advertising, marketing, distribution, offering for sale and the sale of competing products of inferior quality is likely to cause and has caused confusion, mistake and deception by and among consumers and is irreparably harming the Asserted Brand. Defendants have manufactured, imported, distributed, offered for sale and sold their inferior products using the Asserted Brand Copyrights and will continue to do so.
- 31. Defendants, without authorization or license from Plaintiff, knowingly and willfully used and continue to use the Asserted Brand Copyrights in connection with the advertisement, offer for sale and the sale of counterfeit or knockoff Asserted Brand products through, *inter alia*, their Online Stores identified in Schedule "A".
- 32. Upon information and belief, Defendants will continue to infringe the Asserted Brand Copyrights for the purpose of selling inferior knockoff products unless preliminarily and permanently enjoined.
- 33. Defendants' unauthorized use of the Asserted Brand Copyrights in connection with the advertising, distribution, offering for sale, and the sale of poor-quality products in the United

States and specifically into the State of Illinois, is likely to cause and has caused confusion, mistake, and deception by and among consumers and is irreparably harming Plaintiff's Asserted Brand.

34. Unless enjoined, Defendants infringing conduct will continue to cause irreparable harm to Plaintiff.

COUNT I

COPYRIGHT INFRINGEMENT (17 U.S.C. § 101, et seq.)

[Against Defendants Designated in Schedule A]

- 35. Plaintiff repeats, realleges and incorporates by reference herein its allegations contained in paragraphs 1 through 34, above.
- 36. Plaintiff's Asserted Brand Copyrights have significant value and have been produced and created at considerable expense.
- 37. Plaintiff owns all exclusive rights, including without limitation the rights to reproduce the Asserted Brand Copyrights in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public by sale or other transfer of ownership, or by rental, lease, or lending, the copyright protected works.
- 38. Defendants have sold, offered to sell, marketed, distributed, and advertised, and are still selling, offering to sell, marketing, distributing, and advertising products using the Asserted Brand Copyrights without Plaintiff's permission.
- 39. Upon information and belief, Defendants have directly copied the Asserted Brand Copyrights to advertise, promote, offer for sale, and sell competing products of low quality and at a fraction of the price.
- 40. As examples, Defendants deceive unknowing consumers by using, without authorization, the Asserted Brand Copyrights on Defendants' Online Stores to attract customers as follows:

Exemplary of Counterfeit Products sold on Defendants' Online Stores



compared to

Asserted Brand Copyrighted Photographs and 3-D Artwork on Rotita.com



- 41. Defendants' unauthorized exploitation of Asserted Brand Copyrights to advertise, offer for sale and sell inferior products on Defendants' Online Stores constitutes copyright infringement.
- 42. On information and belief, Defendants' infringing acts were willful, deliberate, and committed with prior notice and knowledge of the Asserted Brand Copyrights.
- 43. Each Defendant either knew, or should have reasonably known, that the Asserted Brand Copyrights are copyright protected, and that their unauthorized display and use of the representations infringed on the Asserted Brand Copyrights. Further, each Defendant continues to infringe upon Plaintiff's rights in and to the Asserted Brand Copyrights.
- 44. As a direct and proximate result of their unauthorized and infringing conduct, Defendants have obtained and continue to realize direct and indirect profits and other benefits

rightfully belonging to Plaintiff, and that Defendants would not otherwise have realized but for their infringement of Plaintiff's Asserted Brand Copyrights.

- 45. The foregoing acts of infringement constitute a collective enterprise of shared, overlapping facts and have been willful, intentional, and in disregard of and with indifference to the rights of the Plaintiff.
 - 46. Accordingly, Plaintiff seek an award of damages pursuant to 17 U.S.C. § 504.
- 47. In addition to actual damages, Plaintiff is entitled to receive the profits made by Defendants from their wrongful acts, pursuant to 17 U.S.C. § 504(b). Each Defendant should be required to account for all gains, profits, and advantages derived by each Defendant from their acts of infringement.
- 48. In the alternative, Plaintiff is entitled to, and may elect to choose statutory damages pursuant to 17 U.S.C. § 504(c), which should be enhanced by 17 U.S.C. § 504(c)(2) because of Defendants' willful copyright infringement.
- 49. Plaintiff is entitled to, and may elect to choose injunctive relief under 17 U.S.C. § 502, enjoining any use or exploitation by Defendants of their infringing work and for an order under 17 U.S.C. § 503 that any of Defendants' infringing products be impounded and destroyed.
- 50. Plaintiff seeks and is also entitled to recover reasonable attorneys' fees and costs of suit pursuant to 17 U.S.C. § 505.
- 51. Plaintiff has no adequate remedy at law, and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to the reputation and goodwill of their well-known Asserted Brand.
- 52. The conduct of each Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured monetarily. As such, Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. §§502 and 503, Plaintiff is entitled to injunctive relief prohibiting each Defendant from further infringing the Asserted Brand Copyrights and ordering that each Defendant destroy all unauthorized copies. Defendants' copies, plates, and other embodiments of the copyrighted works from which copies can

be reproduced, if any, should be impounded and forfeited to Plaintiff as instruments of infringement, and all infringing copies created by Defendants should be impounded and forfeited to Plaintiff, under 17 U.S.C §503.

COUNT II

FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

[Against Defendants Designated in Schedule A]

- 53. Plaintiff repeats, realleges and incorporates by reference herein its allegations contained in paragraphs 1 through 34, above.
- 54. Defendants' use of material protected by Plaintiff's Asserted Copyrights for the promotion, marketing, offering for sale, and the sale of knockoff Asserted Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to false affiliation, connection, or association with Plaintiff's Asserted Brand or the false origin, sponsorship, or approval of Defendants' inferior products under Plaintiff's Asserted Brand.
- 55. By using Plaintiff's Asserted Brand Copyrights in connection with Defendants' sale of knockoff products, Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of Defendants' inferior quality products.
- 56. Defendants' conduct constitutes willful false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of its knockoff products to the general public under 15 U.S.C. §§ 1114, 1125.
- 57. Plaintiff has no adequate remedy at law, and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to the company's reputation and the goodwill of the Asserted Brand.

COUNT III

VIOLATION OF ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES ACT (815 ILCS § 510/1, et seq.)

[Against Defendants Designated in Schedule A]

- 58. Plaintiff repeats, realleges and incorporates by reference herein its allegations contained in paragraphs 1 through 34, above.
- 59. Defendants have engaged in acts violating Illinois law including, but not limited to, passing off their knockoff products as those of Plaintiff's Asserted Brand products through the unauthorized use of the Asserted Brand Copyrights, thereby causing a likelihood of confusion and/or misunderstanding as to the source of their goods, causing a likelihood of confusion and/or misunderstanding as to an affiliation, connection, or association with genuine Asserted Brand products, falsely representing that their products have Plaintiff's approval when they do not, and engaging in other conduct which creates a likelihood of confusion or misunderstanding among the public.
- 60. The foregoing acts of Defendants constitute a willful violation of the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510/1, et seq.
- 61. Plaintiff has no adequate remedy at law, and Defendants' conduct has caused Plaintiff to suffer damage to its Asserted Brand's reputation and goodwill. Unless enjoined by the Court, Plaintiff will continue to suffer future irreparable harm as a direct result of Defendants' unlawful activities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants and each of them as follows:

1. That 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 temporarily, preliminarily, and permanently enjoined and restrained from:

- a. using Plaintiff's Asserted Brand Copyrights or any reproductions, counterfeit copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Asserted Brand product or is not authorized by Plaintiff to be sold in connection with its registered copyrights;
- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Asserted Brand product or any other product produced by Plaintiff by using the Asserted Brand Copyrights to sell and offer for sale such products that are not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff;
- c. committing any acts calculated to cause consumers to believe that Defendants' inferior products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff or its Asserted Brand;
- d. further infringing the Asserted Brand Copyrights and damaging Plaintiff's Asserted Brand's reputation and goodwill;
- e. otherwise competing unfairly with Plaintiff through the unauthorized use of the Asserted Brand Copyrights in any manner;
- f. shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory sold or offered for sale through the unauthorized use of the Asserted Brand Copyrights;
- g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendants' stores on Defendants' Online Stores or the Online Platform, or any other domain name or online marketplace account that is being used to sell or is the means by which Defendants could continue to sell knockoff Asserted Brand products through the unauthorized use of the Asserted Brand Copyrights; and
- h. operating and/or hosting websites at the Defendants' Internet stores and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product through the unauthorized use

of the Asserted Brand Copyrights.

- 2. That Defendants, within fourteen (14) days after service of judgment with notice of entry thereof upon them, be required to file with the Court and serve upon Plaintiff a written report under oath setting forth in detail the manner and form in which Defendants have complied with paragraph 1 above;
- 3. Entry of an Order that, upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including AliExpress, Walmart, Amazon, DHgate, eBay, Temu, and Wish, social media platforms such as Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendants' Online Stores, and domain name registrars, shall:
- a. disable and cease providing services for any accounts through which Defendants engage in the sale of knockoff Asserted Brand products by using, without, authorization, the Asserted Brand Copyrights, including any accounts associated with the Defendants listed on Schedule "A";
- b. disable and cease displaying any advertisements used by or associated with Defendants that display the Asserted Brand Copyrights; and
- c. take all necessary steps to prevent links to Defendants' Online Stores identified on Schedule "A" from displaying in search results, including, but not limited to, removing links to Defendants' domain names from any search index.
- 4. That Defendants account for and pay to Plaintiff all profits realized by them through the unauthorized use of the Asserted Brand Copyrights.
- 5. In the alternative, that Plaintiff be awarded statutory damages of not less than \$750 and not more than \$30,000 for each and every infringement of the Asserted Brand Copyrights pursuant to 17 U.S.C. § 504(c), which should be enhanced to a sum of not more than \$150,000 by 17 U.S.C. § 504(c)(2) because of Defendants' willful copyright infringement;

- 6. That Plaintiff be awarded its reasonable attorneys' fees and costs; and
- 7. Award any and all other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff also demands a trial by jury of all issues so triable pursuant to Federal Rule of Civil Procedure 38.

Dated: August 9, 2024 Respectfully Submitted

By: /s/ Shawn A. Mangano

Shawn A. Mangano (IL No. 6299408) Nihat Deniz Bayramoglu (NV Bar No. 14030) Gokalp Bayramoglu (NV Bar No. 15500) Joseph Droter (IL Bar No. 6329630)

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Attorneys for Plaintiff

EXHIBIT 1

Copyright Registration Number	Page Number
VA0002379881	2
1-13195130423	

Rotita10-2019.[Group registration of published photographs.302 photographs. 2019-01-31 to 2019-12-23]

Actions

Registration Number / Date VA0002379881 / 2023-11-12

Type of Work Visual Material

Title Rotita10-2019.[Group registration of published photographs.302 photographs. 2019-01-31 to 2019-12-23]

Application Title Rotita10-2019

Date of Creation 2019

Copyright Claimant

 HONGKONG LEYUZHEN TECHNOLOGY CO., LIMITED. Address: FLAT/RM A, 9/F SILVERCORP INTERNATIONAL TOWER, 707-713 NATHAN ROAD, MONGKOK, KOWLOON, Hong Kong, 999077, Hong Kong.

Authorship on Application

HONGKONG LEYUZHEN TECHNOLOGY CO., LIMITED, employer for hire;
 Citizenship: Hong Kong. Authorship: photographs.

Rights and Permissions

 Nazly Aileen Bayramoglu, Bayramoglu Law Offices, 1540 West Warm Springs Road, Suite 100, Henderson, NV, 89014, (702) 462-5973, tm@bayramoglulegal.com

Description

- o 302 photographs:
- Electronic file (eService)

Copyright Note

C.O. correspondence.

Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Nation of First Publication

United States

Publication Date Range

- o 2019-01-31 to
- o 2019-12-23

Names

HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED

EXHIBIT 2

Defendant No.	Seller's Name	Link to Seller's Website
1	2022summerhots hop	https://www.ebay.com/sch/i.html?_ssn=2022summerhotshop &store_name=2022summerhotshop&_oac=1&_trksid=p442 9486.m3561.l161211
2	47356_y3xym	https://www.ebay.com/sch/i.html?_ssn=47356_y3xym&store _name=47356y3xym&_oac=1&_trksid=p4429486.m3561.11 61211
3	9-09040	https://www.ebay.com/sch/i.html?_ssn=9- 09040&store_name=909040&_oac=1&_trksid=p4429486.m 3561.1161211
4	adafaa	https://www.ebay.com/sch/i.html?_ssn=adafaa&store_name =adafaa&_oac=1&_trksid=p4429486.m3561.l161211
5	ainnee35	https://www.ebay.com/sch/i.html?_ssn=ainnee35&store_na me=ainnee35&_oac=1&_trksid=p4429486.m3561.l161211
6	Allen s-stone	https://www.ebay.com/sch/i.html?_ssn=3q118&store_name=allensstone&_oac=1&_trksid=p4429486.m3561.l161211
7	allr6828	https://www.ebay.com/sch/i.html?_ssn=best-baby888&store_name=allr6828&_oac=1&_trksid=p4429486 .m3561.1161211
8	amylamhappy	https://www.ebay.com/sch/i.html?_ssn=amylamhappy&store _name=amylamhappy&_oac=1&_trksid=p4429486.m3561.1 161211
9	applaudmissView profile	https://www.ebay.com/sch/i.html?_ssn=applaudmiss&store_name=applaudmissviewprofile&_oac=1&_trksid=p4429486. m3561.1161211
10	arearoman	https://www.ebay.com/sch/i.html?_ssn=arearoman&store_na me=arearoman&_oac=1&_trksid=p4429486.m3561.1161211
11	asoeny2021	https://www.ebay.com/sch/i.html?_ssn=asoeny2021&store_n ame=asoeny2021&_oac=1&_trksid=p4429486.m3561.l1612 11
12	avmaowang	https://www.ebay.com/sch/i.html?_ssn=avmaowang&store_name=avmaowang&_oac=1&_trksid=p4429486.m3561.l161 211
13	bainjiidv901	https://www.ebay.com/sch/i.html?_ssn=bainjiidv901&store_name=bainjiidv901&_oac=1&_trksid=p4429486.m3561.116
14	BalDong	https://www.ebay.com/sch/i.html?_ssn=mauras20&store_na me=baldong& oac=1& trksid=p4429486.m3561.l161211
15	be66587	https://www.ebay.com/sch/i.html?_ssn=be66587&store_nam e=be66587& oac=1& trksid=p4429486.m3561.1161211
16	beists	https://www.ebay.com/sch/i.html?_ssn=beists&store_name=beists&_oac=1&_trksid=p4429486.m3561.l161211
17	bestbuy_shops1	https://www.ebay.com/sch/i.html?_ssn=bestbuy_shops&store_name=bestbuyshops1&_oac=1&_trksid=p4429486.m3561.l161211

Defendant No.	Seller's Name	Link to Seller's Website
18	bestkang3 Store	https://www.ebay.com/sch/i.html?_ssn=bestkang3&store_na me=bestkang3store&_oac=1&_trksid=p4429486.m3561.l16 1211
19	beststoreUS	https://www.ebay.com/sch/i.html?_ssn=qilai1217&store_na me=beststoreus&_oac=1&_trksid=p4429486.m3561.l16121
20	bluehigh99	https://www.ebay.com/sch/i.html?_ssn=bluehigh99&store_n ame=bluehigh99&_oac=1&_trksid=p4429486.m3561.l1612
21	buyin_8399	https://www.ebay.com/str/buyin8399?_trksid=p4429486.m3 561.1161211
22	Cat Best Deals, aka cat.deals	https://www.ebay.com/sch/i.html?item=325901403676&rt=n c&_trksid=p4429486.m3561.1161211&_ssn=cat.deals
23	ch_931147	https://www.ebay.com/sch/i.html?_ssn=ch_931147&store_n ame=ch931147&_oac=1&_trksid=p4429486.m3561.l161211
24	chang5616	https://www.ebay.com/sch/i.html?item=195790972408&rt=n c&_trksid=p4429486.m3561.l161211&_ssn=chang5616
25	chenlo63	https://www.ebay.com/sch/i.html?_ssn=chenlo63&store_na me=chenlo63&_oac=1&_trksid=p4429486.m3561.l161211
26	chivde7	https://www.ebay.com/sch/i.html?_ssn=chivde7&store_nam e=chivde7&_oac=1&_trksid=p4429486.m3561.l161211
27	chunyistore	https://www.ebay.com/sch/i.html?_ssn=chunyis_73&store_n ame=chunyistore&_oac=1&_trksid=p4429486.m3561.11612
28	clarity-k	https://www.ebay.com/sch/i.html?item=234761582073&rt=n c& trksid=p4429486.m3561.1161211& ssn=clarity-k
29	clothingffood	https://www.ebay.com/sch/i.html?_ssn=clothingffood&store _name=clothingffood&_oac=1&_trksid=p4429486.m3561.11 61211
30	colsew	https://www.ebay.com/sch/i.html?_ssn=colsew&store_name =colsew66& oac=1& trksid=p4429486.m3561.1161211
31	coocogarder	https://www.ebay.com/sch/i.html?_ssn=coocogarder&store_name=coocogarder&_oac=1&_trksid=p4429486.m3561.l161 211
32	cookiekea5ck	https://www.ebay.com/str/cookiekea5ck?_trksid=p4429486. m3561.1161211
33	cycling jersey pro	https://www.ebay.com/sch/i.html?_ssn=luxingcyc2019&store_name=cyclingjerseypro&_oac=1&_trksid=p4429486.m3561.l161211
34	dasnew	https://www.ebay.com/sch/i.html?_ssn=dasnew&store_name =dasnew&_oac=1&_trksid=p4429486.m3561.1161211
35	DD.DIY.BEADS.	https://www.ebay.com/sch/i.html?_ssn=dd.diy.beads&store_name=ie7glass&_oac=1&_trksid=p4429486.m3561.1161211

Defendant No.	Seller's Name	Link to Seller's Website
36	dhs_stor	https://www.ebay.com/sch/i.html?_ssn=factory*no1*store&s tore_name=dhsstor&_oac=1&_trksid=p4429486.m3561.l161 211
37	di55ny90	https://www.ebay.com/sch/i.html?_ssn=di55nyi90&store_na me=di55nyi90&_oac=1&_trksid=p4429486.m3561.1161211
38	didbest_3	https://www.ebay.com/sch/i.html?_ssn=didbest_3&store_na me=didbest3&_oac=1&_trksid=p4429486.m3561.1161211
39	diereb-yn	https://www.ebay.com/sch/i.html?_ssn=diereb-yn&store_name=dierebyn&_oac=1&_trksid=p4429486.m35 61.1161211
40	eng-3983	https://www.ebay.com/sch/i.html?_ssn=eng- 3983&store_name=eng3983&_oac=1&_trksid=p4429486.m 3561.1161211
41	enshishiwengting sh_0	https://www.ebay.com/sch/i.html?item=126017116320&rt=n c&_trksid=p4429486.m3561.l161211&_ssn=enshishiwengti ngsh 0
42	epaview29rk	https://www.ebay.com/sch/i.html?item=315114372142&rt=n c&_trksid=p4429486.m3561.1161211&_ssn=epaview29rk
43	ephraim000	https://www.ebay.com/sch/i.html?_ssn=ephraim000&store_n ame=ephraim000&_oac=1&_trksid=p4429486.m3561.l1612 11
44	evera841	https://www.ebay.com/sch/i.html?_ssn=evera841&store_na me=evera841&_oac=1&_trksid=p4429486.m3561.1161211
45	factory*direct*sto	https://www.ebay.com/sch/i.html?_ssn=factory*direct*store &store_name=factorydirectstore&_oac=1&_trksid=p442948 6.m3561.l161211
46	factory*outlet*sto re	https://www.ebay.com/sch/i.html?_ssn=outlet*store&store_n ame=factoryoutletstore&_oac=1&_trksid=p4429486.m3561. 1161211
47	Factory*Sales*St ore, aka 2018world*top1	https://www.ebay.com/sch/i.html?_ssn=2018world*top1&st ore_name=factorysalesstore&_oac=1&_trksid=p4429486.m 3561.1161211
48	falishzg	https://www.ebay.com/sch/i.html?_ssn=falishzg&store_nam e=falishzg&_oac=1&_trksid=p4429486.m3561.l161211
49	Fas20xx	https://www.ebay.com/sch/i.html?_ssn=fasxxx&store_name =fasxxx&_oac=1&_trksid=p4429486.m3561.l161211
50	Fashion Fashion Shop	https://www.ebay.com/sch/i.html?_ssn=suzhou-53&store_name=fashionfashionshop&_oac=1&_trksid=p442 9486.m3561.l161211
51	fashion669	https://www.ebay.com/sch/i.html?_ssn=fashion669&store_n ame=fashion669&_oac=1&_trksid=p4429486.m3561.l16121 1

Defendant No.	Seller's Name	Link to Seller's Website
52	fefeaas2 shop	https://www.ebay.com/sch/i.html?_ssn=fefeaas2&store_nam e=fefeaas2shop&_oac=1&_trksid=p4429486.m3561.l16121 1
53	fineesta	https://www.ebay.com/sch/i.html?_ssn=fineesta&store_name =fineesta&_oac=1&_trksid=p4429486.m3561.1161211
54	first888	https://www.ebay.com/sch/i.html?_ssn=first888&store_name =first888&_oac=1&_trksid=p4429486.m3561.1161211
55	flstance shop	https://www.ebay.com/sch/i.html?_ssn=flstance&store_name =flstanceshop&_oac=1&_trksid=p4429486.m3561.l161211
56	Focus Fashion	https://www.ebay.com/sch/i.html?_ssn=beautiful_diary&store_name=beautifuldiary&_oac=1&_trksid=p4429486.m3561.
57	forever778	https://www.ebay.com/sch/i.html?_ssn=forever778&store_n ame=forever778&_oac=1&_trksid=p4429486.m3561.l16121 1
58	Fqz7zonkx	https://www.ebay.com/sch/i.html?_ssn=fqz7zonkx&store_na me=fqz7zonkx& oac=1& trksid=p4429486.m3561.l161211
59	fzmwgwl	https://www.ebay.com/sch/i.html?_ssn=fzmwgwl&store_na me=fzmwgwl&_oac=1&_trksid=p4429486.m3561.1161211
60	Generalfox Official	https://www.ebay.com/sch/i.html?item=386568696538&rt=n c& trksid=p4429486.m3561.1161211& ssn=generalfox
61	gengyan2	https://www.ebay.com/sch/i.html?_ssn=gengyan2&store_na me=gengyan2&_oac=1&_trksid=p4429486.m3561.l161211
62	gostangmotor23	https://www.ebay.com/sch/i.html?item=235229439297&rt=n c&_trksid=p4429486.m3561.l161211&_ssn=gostangmotor2 3
63	hanyanye shop	https://www.ebay.com/sch/i.html?_ssn=www.11753&store_name=hanyanyeshop&_oac=1&_trksid=p4429486.m3561.11 61211
64	happy-buy- forever	https://www.ebay.com/sch/i.html?_ssn=happy-buy-forever&store_name=happybuyforever&_oac=1&_trksid=p4 429486.m3561.l161211
65	hello2014~2023	https://www.ebay.com/sch/i.html?_ssn=welcome_to_here20 14&store_name=hello20142023&_oac=1&_trksid=p442948 6.m3561.l161211
66	hello20200928	https://www.ebay.com/sch/i.html?_ssn=hello20200928&store_name=hello20200928shop&_oac=1&_trksid=p4429486.m 3561.1161211
67	hihappy626	https://www.ebay.com/sch/i.html?_ssn=hihappy626&store_n ame=hihappy626&_oac=1&_trksid=p4429486.m3561.11612
68	hinder14	https://www.ebay.com/sch/i.html?_ssn=hinder14&store_nam e=hinder14&_oac=1&_trksid=p4429486.m3561.1161211

Defendant No.	Seller's Name	Link to Seller's Website
69	hongsh_7	https://www.ebay.com/str/hongsh7?_trksid=p4429486.m356 1.1161211
70	htcrean	https://www.ebay.com/sch/i.html?_ssn=htcrean&store_name =htcrean& oac=1& trksid=p4429486.m3561.1161211
71	huanliu369	https://www.ebay.com/sch/i.html?_ssn=huanliu369&store_n ame=huanliu369&_oac=1&_trksid=p4429486.m3561.l1612 11
72	huaqiasheng	https://www.ebay.com/sch/i.html?_ssn=huaqiasheng&store_name=huaqiasheng&_oac=1&_trksid=p4429486.m3561.116 1211
73	huashixin	https://www.ebay.com/sch/i.html?_ssn=huashixin&store_na me=huashixin& oac=1& trksid=p4429486.m3561.1161211
74	if-you-need-DIY	https://www.ebay.com/sch/i.html?_ssn=you123yoyo&store_name=ifyouneeddiy&_oac=1&_trksid=p4429486.m3561.l16 1211
75	if-you-need-Sexy	https://www.ebay.com/sch/i.html?_ssn=3kk998&store_name =ifyouneedsexy&_oac=1&_trksid=p4429486.m3561.l16121
76	if-you-need- watch	https://www.ebay.com/sch/i.html?_ssn=sousouxxd&store_na me=ifyouneedwatch&_oac=1&_trksid=p4429486.m3561.l16 1211
77	Ireczoukx	https://www.ebay.com/sch/i.html?item=364566426914&rt=n c&_trksid=p4429486.m3561.1161211&_ssn=ireczoukx
78	James-and-Smith	https://www.ebay.com/sch/i.html?_ssn=james179917800&st ore_name=jamesandsmith&_oac=1&_trksid=p4429486.m35 61.1161211
79	jewelery_home88	https://www.ebay.com/sch/i.html?_ssn=woman_home&store _name=jeweleryhome888&_oac=1&_trksid=p4429486.m35 61.l161211
80	jianbiaostore	https://www.ebay.com/sch/i.html?_ssn=pmgx- 4&store_name=jianbiaostore&_oac=1&_trksid=p4429486.m 3561.1161211
81	jie58-51	https://www.ebay.com/sch/i.html?item=404613006662&rt=n c& trksid=p4429486.m3561.1161211& ssn=jie58-51
82	Jimshop268, aka goodshop 268	https://www.ebay.com/sch/i.html?item=394996177464&rt=n c& trksid=p4429486.m3561.1161211& ssn=goodshop 268
83	jookyounger8jy	https://www.ebay.com/str/jookyounger8jy?_trksid=p4429486 .m3561.1161211
84	junesock3jsView profile	https://www.ebay.com/sch/i.html?item=395033740344&rt=n c&_trksid=p4429486.m3561.1161211&_ssn=junesock3js
85	junhu-1910	https://www.ebay.com/sch/i.html?_ssn=junhu-1910&store_name=junhu1910&_oac=1&_trksid=p4429486. m3561.l161211

Defendant No.	Seller's Name	Link to Seller's Website
86	junshe-60	https://www.ebay.com/sch/i.html?_ssn=junshe-60&store_name=junshe60&_oac=1&_trksid=p4429486.m35 61.1161211
87	kevinlee468 shop	https://www.ebay.com/sch/i.html?_ssn=kevinlee468&store_name=kevinlee468shop&_oac=1&_trksid=p4429486.m3561.1161211
88	kunhuiii	https://www.ebay.com/sch/i.html?_ssn=kun.hui&store_name =kunhuiii&_oac=1&_trksid=p4429486.m3561.l161211
89	lancherish_1123	https://www.ebay.com/sch/i.html?_ssn=lancherish_1123&st ore_name=lancherish1123&_oac=1&_trksid=p4429486.m35 61.l161211
90	lanla_5891	https://www.ebay.com/sch/i.html?_ssn=lanla_5891&store_n ame=lanla5891&_oac=1&_trksid=p4429486.m3561.l161211
91	Lanm Tool	https://www.ebay.com/sch/i.html?_ssn=lanm826&store_nam e=lanm826&_oac=1&_trksid=p4429486.m3561.1161211
92	lb2020lbnb shop	https://www.ebay.com/sch/i.html?_ssn=lb2020lbnb&store_n ame=lb2020lbnbshop&_oac=1&_trksid=p4429486.m3561.l1 61211
93	liancxdydzi	https://www.ebay.com/sch/i.html?_ssn=liancxdydzi&store_n ame=liancxdydzi&_oac=1&_trksid=p4429486.m3561.11612 11
94	lichedyn	https://www.ebay.com/sch/i.html?item=314784474578&rt=n c&_trksid=p4429486.m3561.1161211&_ssn=lichedyn
95	lilia_3329	https://www.ebay.com/sch/i.html?_ssn=lilia_3329&store_na me=lilia3329&_oac=1&_trksid=p4429486.m3561.l161211
96	lilisaxiaolu	https://www.ebay.com/sch/i.html?_ssn=100dayslate_9&store _name=lilisaxiaolu&_oac=1&_trksid=p4429486.m3561.l161 211
97	liming_438	https://www.ebay.com/sch/i.html?_ssn=liming_438&store_n ame=liming438&_oac=1&_trksid=p4429486.m3561.l16121
98	limoy95	https://www.ebay.com/sch/i.html?_ssn=limoy95&store_nam e=limoy95&_oac=1& trksid=p4429486.m3561.1161211
99	Linda-and-Betty	https://www.ebay.com/sch/i.html?_ssn=linda_and_betty&store_name=lindaandbetty&_oac=1&_trksid=p4429486.m3561. 1161211
100	lintao	https://www.ebay.com/sch/i.html?_ssn=lintao&store_name=lintao&_oac=1&_trksid=p4429486.m3561.l161211
101	llk212 shop	https://www.ebay.com/sch/i.html?_ssn=llk212&store_name= llk212shop&_oac=1&_trksid=p4429486.m3561.l161211
102	111y_7419	https://www.ebay.com/sch/i.html?_ssn=llly_7419&store_na me=llly7419& oac=1& trksid=p4429486.m3561.l161211

Defendant No.	Seller's Name	Link to Seller's Website
103	lovely*520baby8 88	https://www.ebay.com/sch/i.html?_ssn=factory*store&store_name=lovely520baby888&_oac=1&_trksid=p4429486.m356 1.1161211
104	lsyanan-wu	https://www.ebay.com/sch/i.html?_ssn=lsyanan-wu&store_name=lsyananwu&_oac=1&_trksid=p4429486.m 3561.l161211
105	luck-time	https://www.ebay.com/sch/i.html?_ssn=timelosttime_7&store_name=lucktime&_oac=1&_trksid=p4429486.m3561.l1612
106	luckygirl688	https://www.ebay.com/sch/i.html?_ssn=luckystore6666&store_name=luckygirl688&_oac=1&_trksid=p4429486.m3561.l
107	lvllan1989	https://www.ebay.com/sch/i.html?_ssn=lvllan1989&store_na me=lvllan1989&_oac=1& trksid=p4429486.m3561.l161211
108	mei22ye	https://www.ebay.com/sch/i.html?_ssn=mei22ye&store_nam e=mei22ye& oac=1& trksid=p4429486.m3561.l161211
109	millionreasons11	https://www.ebay.com/sch/i.html?item=225921609108&rt=n c&_trksid=p4429486.m3561.1161211&_ssn=millionreasons 11
110	mingsun123	https://www.ebay.com/sch/i.html?_ssn=mingsun*&store_na me=mingsun123&_oac=1&_trksid=p4429486.m3561.l1612 11
111	mingx-20	https://www.ebay.com/sch/i.html?item=335198695294&rt=n c& trksid=p4429486.m3561.1161211& ssn=mingx-20
112	Misseven7	https://www.ebay.com/sch/i.html?_ssn=upday&store_name= misseven7& oac=1& trksid=p4429486.m3561.1161211
113	msmsmsd	https://www.ebay.com/sch/i.html?_ssn=msmsmsd&store_na me=msmsmsd& oac=1& trksid=p4429486.m3561.l161211
114	mulan56	https://www.ebay.com/sch/i.html?_ssn=mulan56&store_nam e=mulan56& oac=1& trksid=p4429486.m3561.l161211
115	mwangg3k	https://www.ebay.com/sch/i.html?_ssn=mwangg-3k&store_name=mwangg3k&_oac=1&_trksid=p4429486.m 3561.1161211
116	naaapaaa	https://www.ebay.com/sch/i.html?_ssn=naaapaaa&store_na me=naaapaaa& oac=1& trksid=p4429486.m3561.1161211
117	nijiiank	https://www.ebay.com/sch/i.html?item=186061136887&rt=n c& trksid=p4429486.m3561.1161211& ssn=nijiiank
118	num64ber	https://www.ebay.com/sch/i.html?_ssn=num64ber&store_na me=num64ber& oac=1& trksid=p4429486.m3561.l161211
119	offer*shop	https://www.ebay.com/sch/i.html?_ssn=offer*store&store_n ame=chengtingjin&_oac=1&_trksid=p4429486.m3561.l161 211
120	ouxiang12127	https://www.ebay.com/sch/i.html?item=134502701716&rt=n c& trksid=p4429486.m3561.l161211& ssn=ouxiang12127

Defendant No.	Seller's Name	Link to Seller's Website
121	Paieasy Official	https://www.ebay.com/str/paieasyofficial?_trksid=p4429486. m3561.1161211
122	pangp0	https://www.ebay.com/sch/i.html?_ssn=ycy_168&store_nam e=pangp0& oac=1& trksid=p4429486.m3561.l161211
123	pass3zxc	https://www.ebay.com/sch/i.html?_ssn=pass3zxc&store_na me=pass3zxc&_oac=1&_trksid=p4429486.m3561.1161211
124	peghgli	https://www.ebay.com/sch/i.html?_ssn=peghgli&store_name =peghgli&_oac=1&_trksid=p4429486.m3561.1161211
125	perfect-store188	https://www.ebay.com/sch/i.html?_ssn=perfect-store188&store_name=perfectstore188&_oac=1&_trksid=p4429486.m3561.l161211
126	Pinpingp	https://www.ebay.com/sch/i.html?item=374825683531&rt=n c&_trksid=p4429486.m3561.1161211&_ssn=pinpingp
127	poiumn	https://www.ebay.com/sch/i.html?_ssn=poiumn&store_name =poiumn&_oac=1&_trksid=p4429486.m3561.l161211
128	primaryhawker	https://www.ebay.com/sch/i.html?_ssn=primaryhawker&store_name=primaryhawker&_oac=1&_trksid=p4429486.m3561.1161211
129	qqmny88	https://www.ebay.com/sch/i.html?item=375173658595&rt=n c&_trksid=p4429486.m3561.l161211&_ssn=qqmny88
130	Quadruple	https://www.ebay.com/sch/i.html?_ssn=pawd9&store_name =pawd9&_oac=1&_trksid=p4429486.m3561.l161211
131	questeasy	https://www.ebay.com/sch/i.html?_ssn=questeasy&store_na me=questeasy&_oac=1&_trksid=p4429486.m3561.l161211
132	ranran456	https://www.ebay.com/sch/i.html?_ssn=ranran456&store_na me=ranran456&_oac=1&_trksid=p4429486.m3561.1161211
133	rhantop3	https://www.ebay.com/sch/i.html?_ssn=rhantop3&store_nam e=rhantop3&_oac=1&_trksid=p4429486.m3561.l161211
134	rhonnew	https://www.ebay.com/sch/i.html?_ssn=rhonnew&store_nam e=rhonnew&_oac=1&_trksid=p4429486.m3561.l161211
135	s8665s shop	https://www.ebay.com/sch/i.html?_ssn=s8665s&store_name =s8665sshop&_oac=1&_trksid=p4429486.m3561.1161211
136	salessgoods	https://www.ebay.com/sch/i.html?_ssn=salessgoods&store_n ame=salessgoods&_oac=1&_trksid=p4429486.m3561.l1612 11
137	samue-4995	https://www.ebay.com/sch/i.html?item=155723758061&rt=n c&_trksid=p4429486.m3561.l161211&_ssn=samue-4995
138	Sdssd	https://www.ebay.com/str/sdssd?_trksid=p4429486.m3561.11 61211
139	seera848	https://www.ebay.com/sch/i.html?_ssn=seera848&store_name=seera848&_oac=1&_trksid=p4429486.m3561.l161211
140	seeread92	https://www.ebay.com/sch/i.html?_ssn=seeread92&store_na me=seeread92&_oac=1&_trksid=p4429486.m3561.l161211

Defendant No.	Seller's Name	Link to Seller's Website
141	sevencolorslife	https://www.ebay.com/sch/i.html?_ssn=sevencolorslife&store_name=sevencolorslife&_oac=1&_trksid=p4429486.m3561.1161211
142	shengk31	https://www.ebay.com/sch/i.html?_ssn=shengk31&store_na me=shengk31&_oac=1&_trksid=p4429486.m3561.l161211
143	shijie2023	https://www.ebay.com/sch/i.html?_ssn=xiaoxiaoshijie&store _name=shijie2023&_oac=1&_trksid=p4429486.m3561.l161 211
144	shoes_workshop	https://www.ebay.com/sch/i.html?_ssn=shoes_workshop_us 1&store_name=shoesworkshop&_oac=1&_trksid=p4429486 .m3561.l161211
145	Sofirt	https://www.ebay.com/sch/i.html?_ssn=sofirt&store_name=s ofirt&_oac=1&_trksid=p4429486.m3561.1161211
146	Summer2020	https://www.ebay.com/sch/i.html?_ssn=qitds2019&store_na me=qitds2019&_oac=1&_trksid=p4429486.m3561.l161211
147	summer432	https://www.ebay.com/sch/i.html?_ssn=summer432&store_n ame=summer432&_oac=1&_trksid=p4429486.m3561.11612 11
148	sun_ya51	https://www.ebay.com/sch/i.html?_ssn=sun_ya51&store_na me=sunya51&_oac=1&_trksid=p4429486.m3561.1161211
149	svhp1952	https://www.ebay.com/sch/i.html?_ssn=svhp1952&store_na me=svhp1952& oac=1& trksid=p4429486.m3561.l161211
150	svib4047	https://www.ebay.com/sch/i.html?_ssn=zc5188&store_name =svib4047& oac=1& trksid=p4429486.m3561.1161211
151	Tapestry-store	https://www.ebay.com/sch/i.html?_ssn=jaclian-53&store_name=tapestrystore&_oac=1&_trksid=p4429486. m3561.l161211
152	the15045	https://www.ebay.com/sch/i.html?_ssn=thel5045&store_nam e=thel5045& oac=1& trksid=p4429486.m3561.1161211
153	thenewmall202	https://www.ebay.com/str/thenewmall202?_trksid=p4429486 .m3561.l161211
154	Top*Fashion*Sto re	https://www.ebay.com/sch/i.html?_ssn=zhongguo7&store_n ame=womenstore&_oac=1&_trksid=p4429486.m3561.l1612 11
155	tongg_12	https://www.ebay.com/sch/i.html?item=395115602699&rt=n c&_trksid=p4429486.m3561.1161211&_ssn=tongg_12
156	Ttkx renren502	https://www.ebay.com/sch/i.html?_ssn=renren502&store_na me=ttkx&_oac=1&_trksid=p4429486.m3561.l161211
157	ttyttes shop	https://www.ebay.com/sch/i.html?_ssn=ttyttes&store_name= ttyttesshop&_oac=1&_trksid=p4429486.m3561.1161211
158	U_Honor	https://www.ebay.com/str/uhonor?_trksid=p4429486.m3561. 1161211

Defendant No.	Seller's Name	Link to Seller's Website
159	upright520520	https://www.ebay.com/sch/i.html?_ssn=uprighth7&store_na me=upright520520&_oac=1&_trksid=p4429486.m3561.l161 211
160	vk55825 shop	https://www.ebay.com/sch/i.html?_ssn=vk55825&store_nam e=vk55825shop&_oac=1&_trksid=p4429486.m3561.l16121 1
161	wangxiangyue	https://www.ebay.com/sch/i.html?_ssn=hyzhubao&store_na me=wangxiangyue&_oac=1&_trksid=p4429486.m3561.l161 211
162	wape520	https://www.ebay.com/sch/i.html?_ssn=1- wapeao&store_name=wape520&_oac=1&_trksid=p4429486 .m3561.1161211
163	waxxced	https://www.ebay.com/sch/i.html?_ssn=waxxced&store_nam e=waxxced&_oac=1&_trksid=p4429486.m3561.1161211
164	welcome_to_orde r shop	https://www.ebay.com/sch/i.html?_ssn=welcome_to_order&store_name=welcometoordershop&_oac=1&_trksid=p4429486.m3561.l161211
165	wellrichbetter	https://www.ebay.com/sch/i.html?_ssn=ywendfo&store_nam e=ywendfo&_oac=1&_trksid=p4429486.m3561.l161211
166	wenningshop	https://www.ebay.com/sch/i.html?_ssn=wenningshop&store _name=wenningshop&_oac=1&_trksid=p4429486.m3561.11 61211
167	wernette123	https://www.ebay.com/sch/i.html?_ssn=wernette123&store_name=wernette123&_oac=1&_trksid=p4429486.m3561.l161 211
168	weyiqi	https://www.ebay.com/sch/i.html?_ssn=weyiqi&store_name =weyiqi&_oac=1&_trksid=p4429486.m3561.l161211
169	wholeale2022stor	https://www.ebay.com/sch/i.html?_ssn=world*wholesale*sto re&store_name=wholeale2022store&_oac=1&_trksid=p442 9486.m3561.l161211
170	Wholesale*Clothi ng*Shop	https://www.ebay.com/sch/i.html?_ssn=angelcity_shop&store_name=wholesaleclothingshop&_oac=1&_trksid=p4429486.m3561.l161211
171	Wholesale*factor y*store	https://www.ebay.com/sch/i.html?_ssn=huxuan*store&store _name=huxuanbar&_oac=1&_trksid=p4429486.m3561.l161 _211
172	wilso8276	https://www.ebay.com/sch/i.html?_ssn=wilso8276&store_na me=wilso8276& oac=1& trksid=p4429486.m3561.l161211
173	Wujiwsw	https://www.ebay.com/str/wujiwswshop?_trksid=p4429486. m3561.1161211
174	wuying130	https://www.ebay.com/sch/i.html?_ssn=wuying130&store_n ame=wuying130&_oac=1&_trksid=p4429486.m3561.l1612 11

Defendant No.	Seller's Name	Link to Seller's Website
175	wwa52150 shop	https://www.ebay.com/sch/i.html?_ssn=wwa52150&store_n ame=wwa52150shop&_oac=1&_trksid=p4429486.m3561.11 61211
176	xgy890	https://www.ebay.com/sch/i.html?_ssn=xgy890&store_name =xgy890&_oac=1&_trksid=p4429486.m3561.1161211
177	xiao1xiao1 shop	https://www.ebay.com/sch/i.html?_ssn=xiao1xiao1&store_n ame=xiao1xiao1shop&_oac=1&_trksid=p4429486.m3561.11 61211
178	xiaoxiaobai288 shop	https://www.ebay.com/str/xiaoxiaobai288shop?_trksid=p442 9486.m3561.l161211
179	xiaozhi2020 shop	https://www.ebay.com/sch/i.html?_ssn=xiaozhi2020&store_name=xiaozhi2020shop&_oac=1&_trksid=p4429486.m3561.1161211
180	xlz895	https://www.ebay.com/sch/i.html?_ssn=xlz895&store_name =xlz895&_oac=1&_trksid=p4429486.m3561.l161211
181	xmluos2021	https://www.ebay.com/sch/i.html?_ssn=xmluos2021&store_name=xmluos2021&_oac=1&_trksid=p4429486.m3561.l161 211
182	xmslssqxt99	https://www.ebay.com/sch/i.html?_ssn=xmslssqxt99&store_name=xmslssqxt99&_oac=1&_trksid=p4429486.m3561.116
183	xuyan5	https://www.ebay.com/sch/i.html?_ssn=xuyan5&store_name =xuyan5&_oac=1&_trksid=p4429486.m3561.1161211
184	xxdxx2 shop	https://www.ebay.com/sch/i.html?_ssn=xxdxx2&store_name =xxdxx2shop&_oac=1&_trksid=p4429486.m3561.l161211
185	yakq-34	https://www.ebay.com/sch/i.html?item=386515754486&rt=n c& trksid=p4429486.m3561.1161211& ssn=yakq-34
186	yan89d	https://www.ebay.com/sch/i.html?_ssn=yan89d&store_name =yan89d& oac=1& trksid=p4429486.m3561.1161211
187	yejiam_68	https://www.ebay.com/sch/i.html?_ssn=yejiam_68&store_na me=yejiam68& oac=1& trksid=p4429486.m3561.l161211
188	ylongli	https://www.ebay.com/sch/i.html?_ssn=ylong-li&store_name=ylongli&_oac=1&_trksid=p4429486.m3561. 1161211
189	yujie1209	https://www.ebay.com/sch/i.html?_ssn=yujie1209&store_na me=yujie1209&_oac=1&_trksid=p4429486.m3561.l161211
190	yuying78	https://www.ebay.com/sch/i.html?_ssn=yuying78&store_na me=yuying78&_oac=1&_trksid=p4429486.m3561.l161211
191	ууу5640	https://www.ebay.com/sch/i.html?_ssn=yyy5640&store_nam e=yyy5640&_oac=1&_trksid=p4429486.m3561.l161211
192	zhan_8077 shop	https://www.ebay.com/sch/i.html?_ssn=zhan_8077&store_n ame=zhan8077shop&_oac=1&_trksid=p4429486.m3561.l16 1211

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Defendant No.	Seller's Name	Link to Seller's Website
193	Zhaohuanstore	https://www.ebay.com/str/zhaohuanstore?_trksid=p4429486. m3561.1161211
194	zhixiao158 shop	https://www.ebay.com/sch/i.html?_ssn=zhixiao158&store_n ame=zhixiao158shop&_oac=1&_trksid=p4429486.m3561.11 61211
195	zhongbiaoltd shop	https://www.ebay.com/sch/i.html?_ssn=zhongbiaoltd&store_name=zhongbiaoltdshop&_oac=1&_trksid=p4429486.m356 1.1161211
196	zhongbiaomaoyi.l td shop	https://www.ebay.com/sch/i.html?_ssn=zhongbiaomaoyi.ltd &store_name=zhongbiaomaoyiltdshop&_oac=1&_trksid=p4 429486.m3561.l161211
197	zhuanshen2013	https://www.ebay.com/sch/i.html?_ssn=zhuanshen2013&store_name=zhuanshen2013&_oac=1&_trksid=p4429486.m3561.1161211
198	zjz145	https://www.ebay.com/sch/i.html?_ssn=zjz145&store_name =zjz145&_oac=1&_trksid=p4429486.m3561.1161211
199	znustore	https://www.ebay.com/sch/i.html?_ssn=znustore&store_nam e=znustore&_oac=1&_trksid=p4429486.m3561.1161211