

**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-01689-ARW-JC**

**Honorable Judge Andrea R. Wood**

**Magistrate Jeffrey Cole**

**STIPULATION OF DISMISSAL**

Pursuant to Fed. R. Civ. P. 41(A)(ii), PARTIES HEREBY SUBMIT THE FOLLOWING:

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff"), and Defendants; number 92 Yishangtype, and number 109 ENVEMOUR ("Defendants") hereby stipulate to dismiss the above-named defendants from this action, who have resolved all underlying claims with Plaintiff.

**WHEREFORE**

1. Plaintiff filed its First Amended Complaint for Copyright Infringement on July 12, 2024 [Dkt. 24].
2. On July 31, 2024, [Dkt. 29] the Temporary Restraining Order was issued, and Plaintiff immediately served Discovery and subpoenaed the third-party, temu, to obtain Defendant contact information to effectuate service on the Defendants.

3. On August 13, 2024, Plaintiff received the Defendant's contact information from the third-party, temu, and on the same day, electronically served the Schedule A Defendants [Dkt. 32].

4. On September 3, 2024, Attorney for Defendants, number 92 Yishangtype, and number 109 ENVEMOUR appeared, attorney Timothy Wang [Dkt. 45],

5. First contact regarding this case was initiated on August 28, 2024, and by September 3, 2024, earnest discussions between Plaintiff's counsel and Defendants' counsel were regularly occurring.

6. On October 29, 2025, Defendants 92 Yishangtype, and 109 ENVEMOUR filed their Answer and Counterclaims. [Dkt. 65]

7. On January 29, 2025, attorney Timothy Wang withdrew as counsel for Defendants and Defendants continued in this matter in *pro se* [Dkt. 85].

8. By February 21, 2025, agreed upon settlements had been made and parties were actively executing each settlement.

9. Plaintiff and Defendants have already agreed upon the terms of settlement and dismissal. Plaintiff and Defendants have resolved all underlying claims and stipulate to dismissal of Complaint and Counterclaims with prejudice.

THEREFORE, parties hereby request an order granting the stipulated dismissal of defendants by Plaintiff.

DATED: March 3, 2025

Respectfully submitted,

By: /s/ Joseph W. Droter  
Josepg W. Droter (Bar No. 6329630)  
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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of March 2025, 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.

Respectfully submitted,

By: /s/ Joseph W. Droter  
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