

**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-03210

**FIRST AMENDED COMPLAINT FOR
COPYRIGHT INFRINGEMENT**

JURY TRIAL DEMANDED

Hon. Martha M. Pacold

Plaintiff, Hong Kong Leyuzhen Technology Co. Limited (“Plaintiff”), by and through its counsel, the Bayramoglu Law Offices, LLC, submits the following First Amended 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 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 internet stores (“Defendants’ Online Stores”) on the online

Amazon 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 federal copyright registration 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.

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

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 into thinking 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.

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 Asserted.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: June 5, 2024

Respectfully Submitted

By: /s/ Shawn A. Mangano
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, hereby certify, that on the 5th 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
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EXHIBIT 1

Co right Registration Nu er	Page Nu er
VA0002379881 1-13195130423	2
VA0002379894 1-13195071562	3
Va0002379895 1-13195071494	4
VA0002379934 1-13317532199	5

Registration Record Va0002379881
Rotita10-2019. Group Registration Of Published
Photographs.302 Photographs. 2019-01-31 To 2019-12-23

Registration Number / Date VA0002379881 / 2023-11-12
Registration Class VA
Type Of Work Visual Material
Title Rotita10-2019. Group registration of published photographs.302
photographs. 2019-01-31 to 2019-12-23
Application Title
Date Of Creation 2019
Latest Transaction Date And Time 2024-01-23T03:15:34
Copyright Claimant
Authorship On Application
Rights And Permissions
Record Id 35971316
System Control Number
Originating System Control Number VA 002379881
Description
Copyright Note
Nation Of First Publication United States
Publication Date Range
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Registration Record Va0002379894
Rotita6-2022. Group Registration Of Published
Photographs.448 Photographs. 2022-01-04 To 2022-12-30

Registration Number / Date VA0002379894 / 2023-11-12

Registration Class:VA

Type Of Work Visual Material

Title Rotita6-2022. Group registration of published photographs.448
photographs. 2022-01-04 to 2022-12-30

Application Title

Date Of Creation 2022

Latest Transaction Date And Time 2024-01-23T03:15:33

Copyright Claimant

Authorship On Application

Rights And Permissions

Record Id 35971312

System Control Number

Originating System Control Number VA 002379894

Description

Copyright Note

Nation Of First Publication United States

Publication Date Range

Names

Value Url

Value Url

HONGKONG

LEYUZHEN

TECHNOLOGY

CO.,LIMITED

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Registration Record Va0002379895
Rotita5-2021. Group Registration Of Published
Photographs.337 Photographs. 2021-01-19 To 2021-12-30

Registration Number / Date VA0002379895 / 2023-11-12

Registration Class VA

Type Of Work Visual Material

Title: Rotita5-2021. Group registration of published photographs.337
photographs. 2021-01-19 to 2021-12-30

Publication Title

Date Of Creation 2021

Latest Transaction Date And Time 2024-01-23T03:15:33

Copyright Claimant

Authorship On Publication

Rights And Permissions

Record Id 35971311

Source Control Number

Originating Source Control Number VA 002379895

Description

Copyright Note

Nation Of First Publication United States

Publication Date Range

Names

Value Url

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TECHNOLOGY

CO.,LIMITED

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Rotita26-2023. Group registration of published photographs.744 photographs. 2023-01-02 to 2023-07-20

Actions

Registration Number / Date VA0002379934 / 2023-12-20

Type of Work Visual Material

Title Rotita26-2023. Group registration of published photographs.744 photographs. 2023-01-02 to 2023-07-20

Application Title Rotita26-2023

Date of Creation 2023

Copyright Claimant

HONGKONG EYUZHEN ECHNOLOGY O.,LIMITED. Address: FLAT/RM ,9/F ILVERCORP NTERNATIONAL OWER,707-713 ATHAN OAD, ONGKOK,KOWLOON, ONGKONG., HONGKONG, Hong Kong.

Authorship on Application

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Description 744 photographs : Electronic file (eService)

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Names [毛 毛目截畺 一 鉸乏 𠄎倣v 鏢蓋](#)

E HIBIT 2

Defendant No.	Seller's Name	URL to Storefront
Copyright VA0002379881 1-13195130423		
1	Akivide SueJonan	https://www.amazon.com/stores/Akivide/page/BDC81813-6056-4835-B352-9B6EDE07DFA8 ref ast bln
2	Bewellan Wuzhens	https://www.amazon.com/sp ie UTF8 seller A2WB7KC7NY8NA7 asin B0B6VJLSSG ref dp merchant link
3	Cocoinsity	https://www.amazon.com/sp ie UTF8 seller A1 P0BFNDA5DF7 asin B099ML8PY4 ref dp merchant linkcocoinsity
4	DIOB huanxingkuajing	https://www.amazon.com/sp ie UTF8 seller A3JEG5JK HGS2 asin B0B DLMY12 ref dp merchant link
5	Dninmim Shuang.L	https://www.amazon.com/sp ie UTF8 seller AB8BULHV18WM2 isAmazonFulfilled 0 asin B0C8B6DH1P ref olp merch name 1
6	DONGCY ZhuangHuangWuZ	https://www.amazon.com/sp ie UTF8 seller A3JEG5JK HGS2 asin B0B DLMY12 ref dp merchant link
7	ECDAHICC yuchang-e	https://www.amazon.com/stores/ECDAHICC/page/FAF17E69-3734-47B3-9262-076E27233E3D ref ast bln
8	FloHua Made in China and 7-14 Days Delivery.Women's Bikini Sets	https://www.amazon.com/sp ie UTF8 seller A398J9RWTCIC9P asin B0CJL4RV3 ref dp merchant link
9	FWBNUIF	https://www.amazon.com/sp ie UTF8 seller A1MUGO2L T8MJ3 asin B0BSFVB SH ref dp merchant link
10	Generic Aihuah	https://www.amazon.com/sp ie UTF8 seller A1UAU87T6 GOGM asin B0C6ZML HN ref dp merchant link

Defendant No.	Seller's Name	URL to Storefront
11	Generic LKPJJFRG 2024(7-12 day fast delivery)	https://www.amazon.com/sp?ie=UTF8&seller=ALMZHA3U6IOAP&asin=B0BYYWGTPC&ref=dp_merchant_link
12	Generic Lingli-S	https://www.amazon.com/sp?ie=UTF8&seller=A39Y YO3SVJJ2D2&asin=B0B67Z7 NV&ref=dp_merchant_link
13	Generic YGEWJI	https://www.amazon.com/sp?ie=UTF8&seller=A1RTP656IOHU76&asin=B0CSFBWGM3&ref=dp_merchant_link
14	Generic Deals of the Day on CRHOOHR	https://www.amazon.com/sp?ie=UTF8&seller=A3NZ JOLMD0CRZT&asin=B0CNKPSZP8&ref=dp_merchant_link
15	Generic loinrodi Direct	https://www.amazon.com/sp?ie=UTF8&seller=A7FKP PAZ86TG&asin=B0C5JL6YKV&ref=dp_merchant_link
16	Generic Lisheng	https://www.amazon.com/sp?ie=UTF8&seller=A1 ZKRKPJ2YYB1&asin=B0CCNGS9SJ&ref=dp_merchant_link
17	Generic Moomga(7-15 days arrive)	https://www.amazon.com/sp?ie=UTF8&seller=A15AZAZRA1UIJ8&asin=B0C5V67ZSN&ref=dp_merchant_link
18	Generic ZTY66	https://www.amazon.com/sp?ie=UTF8&seller=A2EE SG2U6NATL&asin=B0CB6K6F6G&ref=dp_merchant_link
19	Generic INGMEN 7-15 Tage kommen an	https://www.amazon.de/sp?language=en&ie=UTF8&seller=A3KSU29AIK215S&asin=B0C1Y4VCDN&ref=dp_merchant_link
20	Generic JEShifangjiusu Store	https://www.amazon.com/sp?ie=UTF8&seller=A17F V17G9IB4&asin=B09K S7H6&ref=dp_merchant_link
21	GHAKKE fulinshop	https://www.amazon.ca/sp?ie=UTF8&seller=A20AF GDOHLRB1R&asin=B0C1P7VWYD&ref=dp_merchant_link

Defendant No.	Seller's Name	URL to Storefront
22	GILIOS anyanghangzhenshangm	https://www.amazon.com/sp?ie=UTF8&seller=A1WO0VG5HKL&asin=B0C5MD8TGC&ref=dp_merchant_link
23	Grlasen DUBAUEN	https://www.amazon.com/sp?ie=UTF8&seller=A6C6U4EV6USWT&asin=B0957JTK55&ref=dp_merchant_link_isAmazonFulfilled_1
24	Gumiao SanDiDa	https://www.amazon.com/sp?ie=UTF8&seller=A3906W0W_D63PA&asin=B0CN746DSY&ref=dp_merchant_link
25	HCJKDU	https://www.amazon.ca/sp?ie=UTF8&seller=ADTDVL2I_EFKH&asin=B0C5WD_JC8&ref=dp_merchant_link
26	H SZWJJ	https://www.amazon.com/sp?ie=UTF8&seller=A1503NY3CRTUR3&asin=B09_HJ11GG&ref=dp_merchant_link
27	Jahrioiu YYbnjlm	https://www.amazon.com/sp?ie=UTF8&seller=A1TNO_4W7YEKAI&asin=B0BZVM92RP&ref=dp_merchant_link
28	Lewey LEWISH	https://www.amazon.com/sp?ie=UTF8&seller=A2LF9L489Z7WH5&asin=B0CNH9BTB&ref=dp_merchant_link
29	LOMDEM fantasone	https://www.amazon.com/sp?ie=UTF8&seller=A1NMJHZUHYG5PN&asin=B0C24VZ_KN&ref=dp_merchant_link
30	Lsydnfow Captain Direct	https://www.amazon.com/stores/Lsydnfow/page/B05E6CA9-4E8C-44AB-95EB-EFE1B554DF8C&ref=ast_bln
31	MFJESEAA MFJESEAA Fast Delivery Only 7-10 Days	https://www.amazon.com/sp?ie=UTF8&seller=AGG_WHR6H6A099&asin=B0C2_JPRY7&ref=dp_merchant_link
32	N P taianxianhongxiufuzhuang dian	https://www.amazon.com/sp?ie=UTF8&seller=A2G8U488GPZJL9&asin=B09TKJRPKN&ref=dp_merchant_link

Defendant No.	Seller's Name	URL to Storefront
33	Niaviben	https://www.amazon.com/sp?ie=UTF8&seller=A3JAN5CYS05IU2&asin=B0C5WJF139&ref=dp_merchant_link
34	OBEEII	https://www.amazon.com/sp?ie=UTF8&seller=A3IS7P3JCH2S1&asin=B0C5SMN3&ref=dp_merchant_link
35	Onsoyours Sungood Fashion	https://www.amazon.de/sp?language=en&ie=UTF8&seller=A2YB4RNKUR5AEZ&asin=B09TFF66S7&ref=dp_merchant_link
36	ORT Fieetee	https://www.amazon.com/sp?ie=UTF8&seller=A3HMPBN3L3ZGE7&asin=B0BVMBZP2M&ref=dp_merchant_link
37	Ruziyoog	https://www.amazon.com/sp?ie=UTF8&seller=A1425YB2E54BYA&asin=B09VK2YT&ref=dp_merchant_link
38	SCOMIN taiandejukejiyouxiang	https://www.amazon.com/sp?ie=UTF8&seller=A1HEYD2U1IPTL&asin=B0BPRVRK3K&ref=dp_merchant_link
39	SIUBICH anruioo	https://www.amazon.com/sp?ie=UTF8&seller=A3DBZSFA9OUOV&asin=B0BTVZLZP2&ref=dp_merchant_link
40	Slakkenreis Slakkenreis-Spring Deals 7-20 Days Delivery	https://www.amazon.com/sp?ie=UTF8&seller=A1PSOPNSRW3WM&asin=B0CP3WZ14B&ref=dp_merchant_link
41	slhenay slhenay US	https://www.amazon.com/sp?ie=UTF8&seller=ANJB8P9I4MWY&asin=B0C9H5ZZ1V&ref=dp_merchant_link
42	SNKSDGM LUOGENLI	https://www.amazon.com/sp?ie=UTF8&seller=A17BIM959P4MV&asin=B0B96Y897H&ref=dp_merchant_link
43	Sorrica C. Trendy (Sorrica)	https://www.amazon.com/sp?ie=UTF8&seller=A142B68B4C52W&asin=B098C346&ref=dp_merchant_link

Defendant No.	Seller's Name	URL to Storefront
44	SUZONANA weipinhuifushi	https://www.amazon.com/sp?ie=UTF8&seller=A2PM-D6O-2V-KG&asin=B0CKYCBSRP&ref=dp_merchant_link&isAmazonFulfilled=1
45	Useagrey	https://www.amazon.com/sp?ie=UTF8&seller=A2D3-ULWFD2JM3&asin=B0CJ-SDBP5&ref=dp_merchant_link
46	ZHIDUO ING zheng zhou mi lao shang mao you xian gong si	https://www.amazon.com/sp?ie=UTF8&seller=A1TE-O919I7YMHF&asin=B09WRD4FT2&ref=dp_merchant_link
47	Grlasen DUBAUEN	https://www.amazon.com/sp?ie=UTF8&seller=A6C6-U4EV6USWT&asin=B0957JT66V&ref=dp_merchant_link&isAmazonFulfilled=1
48	HUITKMM	https://www.amazon.com/sp?ie=UTF8&seller=A1-MYUAB1IF35J&asin=B0C-FZH4WP&ref=dp_merchant_link
Copyright VA0002379894 1-13195071562		
49	UIFL jiekeLongLONG	https://www.amazon.com/sp?ie=UTF8&seller=A-K-FCI6Z40TI2&asin=B0CGTZKKG9&ref=dp_merchant_link
50	AirZeal	https://www.amazon.com/sp?ie=UTF8&seller=A3L3-RAPHJ5ESJV&asin=B0B-WTYTGV&ref=dp_merchant_link&isAmazonFulfilled=1
51	Angerella <u>Angerella Fashion</u>	https://www.amazon.com/sp?ie=UTF8&seller=A37T-FKY0PF5Y3&asin=B09MYZ-CB9&ref=dp_merchant_link&isAmazonFulfilled=1
52	BestGirl	https://www.amazon.com/sp?ie=UTF8&seller=A1ZN-8HL-S0HW76&asin=B0BTJV8HC&ref=dp_merchant_link&isAmazonFulfilled=1
53	Bttup	https://www.amazon.com/sp?ie=UTF8&seller=A12-5M9I186LO2&asin=B0CM2BM39J&ref=dp_merchant_link&isAmazonFulfilled=1

Defendant No.	Seller's Name	URL to Storefront
54	chongfeng JingLanDian i(7-20 Days Delivery)	https://www.amazon.com/sp?ie=UTF8&seller=A8K125L9CDDR&asin=B0C1DYDYP&ref=dp_merchant_link
55	ColorYan guangzhoushiwushengpiju you xiangongsi	https://www.amazon.co.uk/sp?ie=UTF8&seller=A3AB5H5TFN4182&asin=B0B6YVMHCT&ref=dp_merchant_link
56	CuteCherry	https://www.amazon.com/sp?ie=UTF8&seller=AT5PKG2HB5ZCN&asin=B0C6DD7WY4&ref=dp_merchant_link&isAmazonFulfilled=1
57	Dawery	https://www.amazon.com/sp?ie=UTF8&seller=AP46B15WHDSKO&asin=B0CPHYZJW8&ref=dp_merchant_link
58	Djeanxa YDuoDuo	https://www.amazon.com/sp?ie=UTF8&seller=A1AVDBC3AB3_6T&asin=B0BW2V962&ref=dp_merchant_link
59	eczipvz eczipvz warehouse clearance	https://www.amazon.com/stores/eczipvz/page/7978DA2C-8DE6-4DE7-AEEF-6FA4C2108980&ref=ast_bln
60	FABRO shileduoshengwuk	https://www.amazon.com/sp?ie=UTF8&seller=A3SR2VO9HJGBR7&asin=B0C9PY57MK&ref=dp_merchant_link
61	Firzero -DH	https://www.amazon.com/sp?ie=UTF8&seller=A31LN9RW3PSWW6&asin=B0CSS4C8YS&ref=dp_merchant_link
62	GDD LM	https://www.amazon.com/sp?ie=UTF8&seller=AN11P8EMOJ1&asin=B0BZSCF6R&ref=dp_merchant_link
63	Generic Wugonta Store	https://www.amazon.com/sp?ie=UTF8&seller=AYGJD9APU09LM&asin=B0CBC4DF3F&ref=dp_merchant_link
64	Generic Lapirek lightning deals today	https://www.amazon.com/sp?ie=UTF8&seller=A21YO7B1PCE4OC&asin=B0C57WF99&ref=dp_merchant_link

Defendant No.	Seller's Name	URL to Storefront
65	Generic GGMYYGS	https://www.amazon.com/sp?ie=UTF8&seller=AUI6MKPG1602F&asin=B0BTBWZGYD&ref=dp_merchant_link
66	Generic Goddess Accent 15-18 Days Delivery	https://www.amazon.com/sp?ie=UTF8&seller=ADKDYVS4OBFNR&asin=B0CNKMR8MR&ref=dp_merchant_link
67	Generic Loyalt	https://www.amazon.com/sp?ie=UTF8&seller=A5YMV293A174&asin=B0BY28JDFL&ref=dp_merchant_link
68	GREEVC SPLENDID SHINE	https://www.amazon.com/sp?ie=UTF8&seller=A10AR100VVDB7V&asin=B0CMTBVBD&ref=dp_merchant_link
69	HFENGKG	https://www.amazon.com/sp?ie=UTF8&seller=A3HAO25OOF1JVC&asin=B0C9DNSZ9&ref=dp_merchant_link
70	HGps8w Cambkatl	https://www.amazon.com/sp?ie=UTF8&seller=A1DYM0Y8GAG92&asin=B0CGF1SSNL&ref=dp_merchant_link
71	HGps8w Cambkatl	https://www.amazon.com/sp?ie=UTF8&seller=A1DYM0Y8GAG92&asin=B0CGF1SSNL&ref=dp_merchant_link
73	HugeNice	https://www.amazon.com/sp?ie=UTF8&seller=A33LCCV65LYC&asin=B09NZW6PP&ref=dp_merchant_link isAmazonFulfilled 1
74	IbuduSexy	https://www.amazon.com/sp?ie=UTF8&seller=A1856U6J8MHWFG&asin=B0CBDLZJB4&ref=dp_merchant_link isAmazonFulfilled 1
75	ITranyee Getitbetter	https://www.amazon.com/sp?ie=UTF8&seller=A19KIZDM8AP4N5&asin=B0BN7RJH8C&ref=dp_merchant_link

Defendant No.	Seller's Name	URL to Storefront
76	MsavigVice	https://www.amazon.com/sp?ie=UTF8&seller=A1FSV5VM6E7S2C&asin=B09K399R&ref=dp_merchant_link&isAmazonFulfilled=1
77	NB NZWF	https://www.amazon.com/sp?ie=UTF8&seller=A1F1IGKS92U0&asin=B0C3H7HVNM&ref=dp_merchant_link
78	Oudemi Danswen	https://www.amazon.com/sp?ie=UTF8&seller=A1SV2HCRGTNI7J&asin=B0BMGN6FS9&ref=dp_merchant_link&isAmazonFulfilled=1
79	PLENTOP MIKINGTOP	https://www.amazon.com/sp?ie=UTF8&seller=A1MGVBWLGUMET&asin=B0C379PLS&ref=dp_merchant_link
80	RCJOLLZ	https://www.amazon.se/sp?language=en&ie=UTF8&seller=A3HDAIT287D45&asin=B092ZSFJW&ref=dp_merchant_link
81	Ruixinxue huixin Fashion	https://www.amazon.com/sp?ie=UTF8&seller=A3H3NZLL70ODG&asin=B0CCYGJS6&ref=dp_merchant_link
82	SeNight	https://www.amazon.com/sp?ie=UTF8&seller=A1VG2FFJHUNFR9&asin=B0CPDJDWTW&ref=dp_merchant_link&isAmazonFulfilled=1
83	SHOWONSKY	https://www.amazon.com/sp?ie=UTF8&seller=A1C0WW2TRBO93H&asin=B0CHJHMKJ&ref=dp_merchant_link
84	SIAOMA SIAOMA US	https://www.amazon.com/sp?ie=UTF8&seller=A3H9P0EI71JG8M&asin=B09BTV5D1&ref=dp_merchant_link
85	STKOOB Smilvy	https://www.amazon.com/sp?ie=UTF8&seller=ABL2B3HZBDRGA&asin=B0BT8J965H&ref=dp_merchant_link
86	TieBnss	https://www.amazon.com/sp?ie=UTF8&seller=A174G6F7YMKO9&asin=B0BP7WJZRF&ref=dp_merchant_link&isAmazonFulfilled=1

Defendant No.	Seller's Name	URL to Storefront
87	Useagrey	https://www.amazon.com/sp?ie=UTF8&seller=A2D3ULWFD2JM3&asin=B0CJ5SDBP5&ref=dp_merchant_link
88	VIVICOLOR	https://www.amazon.com/sp?ie=UTF8&seller=A2ZBF CVBAAE9U&asin=B0CDKKNKKF&ref=dp_merchant_link
89	VSERETLOON lingliufushijingpindian	https://www.amazon.com/sp?ie=UTF8&seller=A1LOK J7HRZE5D&asin=B0CF2WN1YK&ref=dp_merchant_link
90	WjiNFDFG JSWSTORE (Fast logistics / 7-14 day delivery)	https://www.amazon.com/sp?ie=UTF8&seller=A22S1 AM7WV971&asin=B0CPHPC M4&ref=dp_merchant_link
91	Wolddress lalagen	https://www.amazon.com/sp?ie=UTF8&seller=A129N7F11RS16B&asin=B093BYMH H&ref=dp_merchant_link isAmazonFulfilled 1
Copyright VA0002379895 1-13195071494		
92	Akivide Tylorme	https://www.amazon.com/sp?ie=UTF8&seller=A1CFB60RE JUF3&asin=B0CM HKZTD&ref=dp_merchant_link
93	B2prity	https://www.amazon.ca/sp?ie=UTF8&seller=A2 NZ0I880ED8&asin=B08ZY KRGN&ref=dp_merchant_link isAmazonFulfilled 1
94	Bebiullo bebiullo-Apparel	https://www.amazon.com/sp?ie=UTF8&seller=A3IP4LBRA1 BL0&asin=B0BVH 6N95&ref=dp_merchant_link
95	Beverly Store Etily	https://www.amazon.com/sp?ie=UTF8&seller=A12HMN9RBHO7D5&asin=B09SCW5928&ref=dp_merchant_link isAmazonFulfilled 1
96	Bilqis Bilqis Clearance Sales Today Deals Prime	https://www.amazon.com/sp?ie=UTF8&seller=A1B5MN315BMKED&asin=B0CSFKZLP8&ref=dp_merchant_link

Defendant No.	Seller's Name	URL to Storefront
97	BO IACEY OFF 75% (holiday deals)	https://www.amazon.com/sp?ie=UTF8&seller=A1WT7FS77YP1M&asin=B0BYMNSJ5L&ref=dp_merchant_link
98	CDZL shihongrong shop shihongrong	https://www.amazon.com/sp?ie=UTF8&seller=A1WT7FS77YP1M&asin=B0BYMKF6GY&ref=dp_merchant_link
99	DUOBEY ZJDDDDJ Z-US	https://www.amazon.com/sp?ie=UTF8&seller=A2A8VBIN71LFC&asin=B0CBNS7P2J&ref=dp_merchant_link
100	ENOPINK fabuloud	https://www.amazon.com/sp?ie=UTF8&seller=A39CJM4OKG0B0Y&asin=B0BG47G8LF&ref=dp_merchant_link
101	Generic bgtlik	https://www.amazon.com/sp?ie=UTF8&seller=APC5D8KE8UR3I&asin=B0B5JW86VH&ref=dp_merchant_link
102	Generic mutourn	https://www.amazon.com/sp?ie=UTF8&seller=A6IYL39TCOKFW&asin=B0CHYCY31&ref=dp_merchant_link
103	Generic Cihcicxc	https://www.amazon.com/sp?ie=UTF8&seller=AJ1GZBHFNWGN2&asin=B09MVWTMY&ref=dp_merchant_link isAmazonFulfilled 1
104	Generic Lovor	https://www.amazon.com/sp?ie=UTF8&seller=A3DUE8IC Y2L14&asin=B0BTHLVHWP&ref=dp_merchant_link
105	Generic Wugonta Store	https://www.amazon.com/sp?ie=UTF8&seller=AYGJD9APU09LM&asin=B0CBC31T26&ref=dp_merchant_link
106	JUNGE JUNGE(7-20 days delivery)	https://www.amazon.com/sp?ie=UTF8&seller=AG6E7L9ELBCM&asin=B09VKT69Z&ref=dp_merchant_link
107	LaiyiVic	https://www.amazon.com/sp?ie=UTF8&seller=A8W6GPHZ I613&asin=B09BN2YWGF&ref=dp_merchant_link isAmazonFulfilled 1

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108	Lcyhony lcyhony 2023 Black Friday Deals-7-20 Days Delivery	https://www.amazon.com/sp?ie=UTF8&seller=A2B-G55JY-UG-8&asin=B0BMP5FCN2&ref=dp_merchant_link
109	LEKODE	https://www.amazon.com/sp?ie=UTF8&seller=A13E-ZCDVI1B5FV&asin=B0CB8J91RP&ref=dp_merchant_link
110	Miqil Saisnoi	https://www.amazon.com/sp?ie=UTF8&seller=A1S2-68L6TZF-PL&asin=B09YDFTT-W&ref=dp_merchant_link
111	MOBCTG Lightning Deals Of Today UFECH	https://www.amazon.com/sp?ie=UTF8&seller=A3-I-M8FGMAA0M2&asin=B09Y5-R6T9&ref=dp_merchant_link
112	NOIPPONG Aunimeifly	https://www.amazon.com/sp?ie=UTF8&seller=A1LA-K8Z-PHK&asin=B0C9JHP4GJ&ref=dp_merchant_link
113	OLEMEK ingYU	https://www.amazon.com/stores/OLEMEK/page/F2A-325E7-B817-4DFA-8A50-03951187B1BA&ref=ast_bln
114	Oplxuo	https://www.amazon.com/sp?ie=UTF8&seller=A3U-GU68ZE336UJ&asin=B0CP7GCC73&ref=dp_merchant_link
115	PETYCZEN "PETYCZEN" Big Spring Sale 2024	https://www.amazon.com/sp?ie=UTF8&seller=A2-IGEAWMTL7C8&isAmazonFulfilled=0&asin=B0C6-Z3TD8F&ref=olp_merchant_name_1
116	Pretifulce iart-5-15 Days Standard Shipping	https://www.amazon.com/sp?ie=UTF8&seller=A2H-A4DSN3U3P0V&asin=B0B59CFNYY&ref=dp_merchant_link
117	iribati Guohe Store	https://www.amazon.de/sp?language=en&ie=UTF8&seller=A2-4GGWAMAWYY&asin=B09-V1BDF-W&ref=dp_merchant_link
118	RYTEJFES-Store Piobiou52 Versand 7-15 Tage	https://www.amazon.de/sp?language=en&ie=UTF8&seller=A1LD7EC4CFYZE1&asin=B0BVBHJ86J&ref=dp_merchant_link

Defendant No.	Seller's Name	URL to Storefront
119	Sinzelimin CJHDYM	https://www.amazon.com/sp?ie=UTF8&seller=A2B4Y7N92U0L5&asin=B09PLH7VZ ref dp merchant link
120	SperLucky	https://www.amazon.com/sp?ie=UTF8&seller=AM212VYZ9HCU&asin=B0BV9MW58H ref dp merchant link isAmazonFulfilled 1
121	Suncolour	https://www.amazon.com/sp?ie=UTF8&seller=A3AFVHA6M9HMIY&asin=B0C9F5Z9R ref dp merchant link
122	TIAFORD MyLifeGetingbest	https://www.amazon.com/sp?ie=UTF8&seller=A3RLN2SCP6AJHW&asin=B0CF3ZFK2 ref dp merchant link
123	TRENIS Wenmuriyongpinbaihuo	https://www.amazon.com/sp?ie=UTF8&seller=A2G5FDR7ZDZ8PL&asin=B0C5FTDS ref dp merchant link
124	uojfnhb \$dol\$R\$	https://www.amazon.com/sp?ie=UTF8&seller=ALAMVRIVW8IZ3&asin=B0CP3ZKB R ref dp merchant link
125	Vifucz Vifucz Dress Store	https://www.amazon.com/sp?ie=UTF8&seller=A10PT_S0KZ3M_J&asin=B09ZKBYT ref dp merchant link
126	VisiChenup	https://www.amazon.com/sp?ie=UTF8&seller=A2YOCBRYTTNUE2&asin=B0BTBCDRV ref dp merchant link isAmazonFulfilled 1
127	ViYW Kexdaaf	https://www.amazon.com/sp?ie=UTF8&seller=A8H02NJ5NLW9&asin=B0CPFL1JB4 ref dp merchant link
128	YOLAI Plufnvea	https://www.amazon.com/sp?ie=UTF8&seller=A3PBM3T_RTWD8I&asin=B0C1J25TGJ ref dp merchant link
129	zcgoxvn Ice ue	https://www.amazon.com/sp?ie=UTF8&seller=A3PNLMSN3NAN8D&asin=B0CNKLZW23 ref dp merchant link

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130	BIVENANT YiRuJingWei	https://www.amazon.com/sp?ie=UTF8&seller=AC33YTT24P 9 asin B0CRVFT RJ ref dp merchant link
131	Generic fengjunhao	https://www.amazon.com/sp?ie=UTF8&seller=A3KIG4K 21 0D asin B0C3 LSMNR ref dp merchant link
132	Generic \$\$\$us	https://www.amazon.com/sp?ie=UTF8&seller=AKG3VIV22F3T6 asin B0C2TRZ7BG ref dp merchant link
133	GHAKKE fulinshop	https://www.amazon.com/sp?ie=UTF8&seller=A20AFGDOHLRB1R asin B0CK1CGDZY ref dp merchant link
134	Jdkmera	https://www.amazon.com/sp?ie=UTF8&seller=A33G26JTO1O5UK asin B0C8JPYMB7 ref dp merchant link isAmazonFulfilled 1
135	MOJICK	https://www.amazon.com/sp?ie=UTF8&seller=A3LI8RLL84 B8N asin B0C8LTZ447 ref dp merchant link isAmazonFulfilled 1
136	sexycherry	https://www.amazon.ca/sp?ie=UTF8&seller=A3NLWIN351W45P asin B0CB63K6NG ref dp merchant link isAmazonFulfilled 1
137	SperLucky	https://www.amazon.com/sp?ie=UTF8&seller=AM212VYZ 9HCU asin B0CNJN78 ref dp merchant link isAmazonFulfilled 1
138	ZunFeo ZunFeo Fashion Queens (7-15Days Delivery)	https://www.amazon.com/sp?ie=UTF8&seller=AAZR8J8U6G0BI asin B0C3WGNNYK ref dp merchant link