

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

HONG KONG LEYUZHEN TECHNOLOGY
CO., LTD.,

Plaintiff,

v.

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

Defendants.

Case No. 1:24-CV-03210-MMP-SMF

Honorable Martha M. Pacold

Magistrate Sheila M. Finnegan

**REPLY BRIEF IN SUPPORT OF PLAINTIFF’S MOTION FOR PRELIMINARY
INJUNCTION**

Hong Kong Leyuzhen Technology Co., Ltd. (“Plaintiff”) submits this Reply Brief in Support of Plaintiff’s its Motion for Preliminary Injunction (the “Reply”).

This Reply is supported by the pleadings and papers on file in this action, including the Motion for Temporary Restraining Order [Dkt. Nos. 7 through 7-8], the Motion for Preliminary Injunction [Dkt. No. 29], the Declaration of Shawn A. Mangano, Esq. [Dkt. No. 29-2], the Supplemental Declaration of Shawn A. Mangano (the “Supp. Mangano Decl.”), the Declaration of Liangjie Li (the “Li Decl.”), the Declaration of Joseph W. Droter (the “Droter Decl.”), and the Declaration of Lilly O’Dea (the “O’Dea Decl.”), together with the arguments set forth herein and any oral argument by counsel entertained by the Court at the hearing set on this matter.

I. INTRODUCTION

Plaintiff’s Motion for Preliminary Injunction [Dkt. No. 29] comes before the Court under circumstances where at least a dozen Defendants in this action have already had a preliminary

injunction entered against them for using Plaintiff’s copyright protected images, without authorization, to sell counterfeit Rotita brand products on Amazon’s website. (Supp. Mangano Decl. ¶ 6.) Specifically, on June 5, 2024, Judge Matthew Kennelly (Case No. 1:24-cv-02939-MFK-BWJ) conducted a two-hour, in-person, hearing [Dkt. No. 80] and rejected the exact same arguments being raised by Defendants here. (Supp. Mangano Decl. ¶ 6.) In his ruling, Judge Kennelly determined that joinder was proper, that personal jurisdiction could be exercised over the Defendants, and agreed with Plaintiff’s approach in release a majority, if not all, the funds subject to Amazon’s asset freeze. [Dkt. Nos. 80, 83.] As a result, Plaintiff’s Motion for Preliminary Injunction was granted. [Dkt. No. 80.] Plaintiff asks this Court to follow Judge Kennelly lead and grant its request for entry of a preliminary injunction in this action.

A. PLAINTIFF’S ROTITA BRAND IS EXTREMELY SUCCESSFUL AND THE COMPANY SPENDS CONSIDERABLE FUNDS TO PROTECT AND PROMOTE IT.

Plaintiff had sought to proceed anonymously in this action because its “Rotita” brand (“Rotita”) is an extremely well-known source of women’s clothing in the United States and has been the subject of rampant counterfeit sales through online platforms such as Amazon, Walmart, Aliexpress, eBay, Walmart, and Alibaba. (Supp. Mangano Decl. ¶ 7; Li Decl. ¶¶ 4-5.) These are the six largest online retailers in the World – and Plaintiff does not sell its products through any one of them. (*Id.*; Li Decl. ¶ 5.) Rather, Plaintiff only sells its genuine Rotita brand products through its website rotita.com. (*Ibid.*)

When Plaintiff decided to take action against these counterfeit sellers, it fully appreciated that once the company’s identity was known and the related brand being protected was concomitantly revealed, counterfeit operators across all six online platforms would immediately delete links to their online accounts, halt access to their online sales records, and siphon any ill-

gotten gains held in their online accounts to offshore accounts beyond the jurisdiction of this Court. (Supp. Mangano Decl. ¶ 8.) In addition, these bad actors would quickly disseminate all known information concerning Plaintiff and its brand enforcement efforts by Internet posts on such counterfeit seller website and message boards as “SellerDefense.cn.” (*Id.*) In fact, Defendant sellers have superficially sought information about numerous pending cases initiated in this judicial district including actions pending before this Court, and before Judge Kendall, Judge Cummings, Judge Kennelly, and Judge Wood. (*Id.* ¶ 9.) As a result, each of these Courts determined that Plaintiff had established “exceptional circumstances” necessary to permit Plaintiff to proceed under a corporate pseudonym. (*Id.*)

The record in this action needs to be crystal clear. Plaintiff’s estimated gross revenue from United States sales likely exceeds \$20,000,000 USD per year. (*Id.* ¶ 10; Li Decl. ¶ 6.) Of this amount, Plaintiff estimates that at well over \$1,000,000 is derived from sales in the State of Illinois. (*Ibid.*) Moreover, Plaintiff estimates that it spends anywhere from \$8,000,000 to \$12,000,000 USD each year to specifically advertise its Rotita brand in the United States through such online advertising sources as Google Ads, Facebook, and Bing. (*Ibid.*) Furthermore, the company has spent more than \$80,000 in filing fees paid to the United States Copyright Office just to secure registration of copyright protected works being asserted in eleven (11) enforcement actions initiated in this judicial district. (*Ibid.*) Simply put, Plaintiff is an extremely successful company that earns millions of dollars from product sales in the United States – including within the State of Illinois. (*Ibid.*) To do so, Plaintiff annually spends tens of millions of dollars advertising in the United States to promote the sale of its brand. (*Ibid.*)

Succinctly stated, Plaintiff simply will no longer tolerate the proliferation of counterfeit sales through the unauthorized use of its federally registered copyright images on online

platforms through which it does not offer its genuine products. These counterfeit operators must be stopped. Otherwise, Plaintiff's intellectual property rights, which it has paid significantly to secure, are worthless. (Li Decl. ¶ 6.)

B. THIS ACTION IS PART OF A LARGER COPYRIGHT ENFORCEMENT CAMPAIGN INITIATED AGAINST OVER 2,500 DEFENDANTS SELLING COUNTERFEIT PRODUCTS ON SIX OF THE LARGEST ONLINE PLATFORMS IN THE WORLD.

Plaintiff's operative Complaint in this action is but one piece in a multi-action copyright enforcement campaign that seeks to dismantle a criminal network that operates through six (6) of the largest online retail platforms in existence and includes over 2,500 named Schedule "A" Defendants. (Supp. Mangano Decl. ¶ 11.) These named Schedule "A" Defendants are alleged to be engaged in the practice of directly, and intentionally, copying, without authorization, Plaintiff's copyright protected product images almost instantaneously after they are first displayed on the company's website and then associating these images with the sale and promotion of counterfeit products of substandard quality, thereby deceiving consumers – including the citizens of the State of Illinois. (*Id.*) Moreover, given the nature of Plaintiff's textile manufactured women's clothing products, such large-scale counterfeit sales operations over multiple online retail platforms require considerable supply chain coordination efforts that could not reasonably be accomplished independently by any of the named Defendants. (*Id.*; Li Decl. ¶ 7.) In short, these counterfeit sales operations require one or more textile manufacturing factories, sourcing of identical, counterfeit fabrics and patterns, distribution networks to fulfill retail orders for these counterfeit goods, and the end sellers needed to promote and solicit sales. (*Ibid.*)

The sophistication of Defendants’ online, counterfeit sales network is further demonstrated by the skill with which they identify Schedule “A” plaintiffs, their allegedly infringed products or brands, and then immediately disseminating this information throughout their network by posting on online websites such as “SellerDefense.cn.” (Supp. Mangano Decl. ¶ 12; Li Decl. ¶ 8.) The dissemination process is straightforward, but highly effective. (*Ibid.*) Potential defendants or their proxies carefully monitor newly filed Schedule “A” cases commenced in this judicial district and in other districts throughout the country. (Supp. Mangano Decl. ¶ 12.) Once a new case is identified, a request for any information related to it is posted online or, if information is already known about the action, that information is disclosed. (*Id.*) The dissemination of this information then immediately results in any named defendants siphoning off all illicit funds held in their online accounts, online store links are deleted, and key discoverable sales information is almost certainly lost or rendered extremely difficult to recover. (*Id.*) This results in plaintiffs being deprived of any meaningful opportunity to redress the harm caused by Defendants’ infringing conduct by attacking their financial resources. (*Id.*) The multiple copyright enforcement actions commenced by Plaintiff in this judicial district have been specifically targeted by this tactic – including actions pending before this Court, and pending before Judge Cummings, Judge Kendall, Judge Wood, and Judge Kennelly. (*Id.*)

As previously presented to this Court in connection with the company’s request for entry of a temporary restraining order [Dkt. Nos. 7 through 7-8], Plaintiff has presented substantial evidence that Defendants have intentionally copied its copyright protected works. (Supp. Mangano Decl. ¶ 13.) This evidence includes a literal one-for-one copying of these protected works and their unauthorized display on Defendants’ online storefronts, which are offering substandard, counterfeit products for sale to United States citizens, including those residing in

the State of Illinois. [Dkt. Nos. 7 through 7-8.] Substantively, this evidence clearly demonstrates that Plaintiff has an extremely high likelihood of success on the merits of its copyright infringement claim, as well as its associated claims for false designation of origin and violation of Illinois' deceptive trade practices act. [Dkt. Nos. 1, 45.]

As also previously argued to this Court in support of its request for entry of a temporary restraining order [Dkt. Nos. 7 through 7-8], Plaintiff would unquestionably suffer irreparable harm absent entry of injunctive relief through the spoliation of essential evidence and Defendants absconding with significant ill-gotten gains derived from their intentional infringement of Plaintiff's federally secured copyright protected works. (Supp. Mangano Decl. ¶ 13.) These facts still exist today and support entry of preliminary injunctive relief effective until full adjudication of this matter. (*Id.*) Moreover, refusing to grant such relief would completely diminish the considerable financial resources paid by Plaintiff to secure the federal copyright registrations sought to be enforced in this action, and in the other ten (10) pending actions in this judicial district, and ignore the tens of millions of dollars spend by the company to promote and advertise the Rotita brand in the United States. (*Id.*) Accordingly, as argued herein, Plaintiff respectfully requests the Court further enjoin the Defendants through entry of a preliminary injunction.

II. ARGUMENT

A. ENTRY OF A PRELIMINARY INJUNCTION IS WARRANTED.

Plaintiff has previously submitted substantial evidence that demonstrates its entitlement to entry of preliminary injunctive relief in this action through its submissions made in support of its motion for entry of the Temporary Restraining Order (the "TRO") granted by this Court. [Dkt. No. 20.] While these prior submissions should sufficiently justify entry of Plaintiff's request for entry

of a preliminary injunction, the company wishes to address certain arguments anticipated to be advanced by those Schedule “A” Defendants now appearing through counsel.

a. Defendants Are Subject to Personal Jurisdiction.

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

It is without question that specific personal jurisdiction may properly be exercised over a defendant that has engaged in an online presence, directed to the forum state, that results in order and shipment confirmations. *Curry v. Revolution Laboratories, LLC*, 949 F.3d 385, 399 (7th Cir. 2020) (online order and shipping confirmations sufficient for specific jurisdiction). Moreover, even receipt of a single, counterfeit or infringing product in the forum state is sufficient for the exercise of specific personal jurisdiction. *See NBA Properties, Inc. v. HANWJH*, 46 F.4th 614, 624 (7th Cir. 2022).

Here, a vast majority of the represented Defendants have asserted they have made absolutely no sales in the State of Illinois, nor have they adequately targeted the jurisdiction sufficient for specific jurisdiction to be exercised over them. Plaintiff’s independent investigation, which could have been more extensive given additional time, revealed that, at least, six (6) of the Represented Defendants were operating additional stores on Amazon.com that used, at least, misappropriated copyright protected images that infringe two (2) federally registered copyrights and also, infringe an additional eight (8) unregistered copyrights in connection with the sale of counterfeit Rotita brand products. (Li Decl. ¶ 9.) In sum, Plaintiff has identified the exact same counterfeit operations alleged to have been operating in this case currently operating elsewhere through storefronts maintained by numerous represented Defendants on the Amazon platform.

Not only has Plaintiff identified these parallel, identical, counterfeit sales operations using its copyright protected images as bait for unsuspecting consumers, it has, through a third-party, placed orders for these counterfeit products, received order confirmations in response, been provided access to shipping updates, and has physically received at least one counterfeit product in Chicago, Illinois. (O’Dea Decl. ¶¶ 4-6, Exs. 1-2; Droter Decl. ¶¶ 4-16, Exs. A-C.) Given additional time, Plaintiff is confident that it could supply the Court with even more counterfeit Rotita products received from the represented Defendants’ Amazon storefronts once they arrive at their destination in Chicago, Illinois.

In addition to the foregoing facts, the Court is reminded that the Defendants are alleged to be engaged in a highly sophisticated, counterfeit operation in which they are acting in concert and obtaining finished, source products from at least one common supplier. (Supp. Mangano Decl. ¶ 11; Supp. Li Decl. ¶ 7, 10.) Under this scenario, specific personal jurisdiction exercised against one Defendant should be imputed against all Defendants. *See Textor v. Board of Regents of Northern Illinois University*, 711 F.3d 1387, 1392-93 (7th Cir. 1983). To the extent the Court requires Plaintiff to more sufficiently plead these allegations to sustain specific personal jurisdiction on this basis, it is prepared to do so as a condition for entering the requested injunctive relief. Such relief would preserve the viable basis for Plaintiff’s entitlement to injunctive relief while merely conforming the pleadings before the Court to conform with the evidence already presented.

In short, existing caselaw from the Seventh Circuit and from this district supports the exercise of specific personal jurisdiction over Defendants on the record presented. To the extent the Court is somehow unconvinced given the record before it, Plaintiff asks that its request for entry of preliminary injunctive relief be granted while it engages in jurisdictional discovery. To

this end, Plaintiff has already made a *prima facie* showing that specific jurisdiction should be exercised over multiple represented and appearing Defendants. *See Central States Pension Fund v. Reimer Express World Corp.*, 230 F.3d 934, 946 (7th Cir. 2000). In this regard, Plaintiff has set forth other, specifically targeted discovery efforts related to jurisdictional issues with this submission. (Supp. Mangano Decl. ¶ 17.) Accordingly, Plaintiff respectfully requests the Court find that it may properly exercise specific personal jurisdiction over the represented Defendants on the record presented or, alternatively, enter the requested injunctive relief for an interim period while Plaintiff engages in jurisdictional discovery.

b. No Improper Joinder Issues Exist.

Schedule “A” cases frequently involve multiple defendants being accused of infringing a host of copyrights, trademarks, trade dress rights, or other intellectual property rights asserted without concern for their relation to one another. Unquestionably, this has been done to intentionally subvert the individual filing requirements for separate actions. *See Slep-Tone Ent. Corp. v. Roberto*, No. 12-cv-5750, 2013 WL 5748896, at *2–3 (N.D. Ill. Oct. 22, 2013); *ThermaPure, Inc. v. Temp-Air, Inc.*, No. 10-cv-4724, 2010 WL 5419090, at *4 (N.D. Ill. Dec. 22, 2010); *Spread Spectrum Screening, LLC v. Eastman Kodak Co.*, No. 10 C 1101, 2010 WL 3516106, at *2 (N.D. Ill. Sept. 1, 2010); *SB Designs v. Reebok Int'l, Ltd.*, 305 F.Supp.2d 888, 892 (N.D. Ill. 2004). This is simply not the case before the Court.

Plaintiff has specifically limited its claims against the identified Defendants because they have infringed the same or similar federally registered copyright protected works. (Supp. Mangano Decl. ¶ 18.) Moreover, each of the named Defendants are Chinese nationals or entities accused of offering their counterfeit products through the Amazon platform. (*Id.*) All the named Defendants are alleged to be engaged in an affiliated online network whereby they, at least, obtain

their counterfeit goods through the same sources. (Supp. Mangano Decl. ¶ 18.) Furthermore, the Defendants are alleged to be acting in concert as part of a large counterfeit operation. (*Id.*) These facts clearly, and unquestionably, meet the common issues of fact or law required for proper joinder under Federal Rule of Civil Procedure 20(a)(2). *Estée Lauder Cosms. Ltd. v. P’ships & Unincorporated Ass’ns Identified on Schedule “A”*, 334 F.R.D. 182, 185 (N.D. Ill. 2020) (quoting *Ross ex rel. Ross v. Bd. of Educ. of Twp. High Sch. Dist. 211*, 486 F.3d 279, 284 (7th Cir. 2007)). Accordingly, any improper joinder arguments advanced by Defendants should fail.

c. Plaintiff would suffer irreparable harm absent entry of injunctive relief.

Plaintiff would unquestionably suffer irreparable harm if preliminary injunctive relief is not granted. In this regard, the Copyright Act expressly authorizes courts to issue “grant temporary and final injunctions on such terms as it may deem reasonable to prevent or restrain infringement of a copyright.” 17 U.S.C. § 502(a).

As with the issued TRO, Plaintiff requests issuance of the preliminary injunction to prevent the Defendants from using, without authorization, the company’s copyright protected images in connection with the manufacture, importation, distribution, offering for sale, and sale of counterfeit products. (Supp. Mangano Decl. ¶ 19.) This results in the direct harm to Plaintiff’s brand reputation and loss of consumer goodwill, both of which are harms that are virtually impossible to ascertain the resulting economic loss (*Id.*) See *Life Spine, Inc. v. Aegis Spine, Inc.*, 8 F.4th 531, 546 (7th Cir. 2021); *Ty, Inc. v. Jones Group, Inc.*, 237 F.3d 891, 902 (7th Cir. 2001). As such, these harms constitute irreparable harm. *Ibid.* Absent issuance of this requested preliminary injunctive relief, Defendants’ intentional infringement of Plaintiff’s federally secured rights will unquestionably continue. (Supp. Mangano Decl. ¶ 20.) As such, extension of this relief, which was originally granted through issuance of the TRO, should be further

continued through issuance of the requested preliminary injunction until this case is fully adjudicated by the Court. Failure to extend the injunctive relief previously granted through issuance of the TRO subjects Plaintiff to irreparable harm through the continued violation of its federally registered rights granted in and to the copyrighted works at-issue in this action. (Supp. Mangano Decl. ¶ 19.)

Plaintiff's demonstration of irreparable harm absent conversion of the TRO to a preliminary injunction is also based the high likelihood that Defendants would delete links to their online stores, thereby erasing key evidence related to their online accounts such as product sales information and ill-gotten funds derived from their intentional infringement of the company's copyright protected works, that would otherwise be deleted, or transferred to unknown locales, unless they remain frozen until conclusion of this action. (*Id.* ¶ 20.) This harm simply cannot be monetarily quantified and, as such, supports a finding of irreparable harm. *See Graphic Design Marketing, Inc. v. Xtreme Enterprises, Inc.*, 772 F.Supp.2d 1029, 1034 (E.D. Wis. 2011). This same harm justified entry of the TRO and it continues to exist today, which clearly justifies entry of the requested preliminary injunction. (Mangano Decl. ¶ 20.) Simply put, absent extending the relief granted under the TRO to a preliminary injunction, Plaintiff would be irreparably harmed through Defendants' efforts to avoid enforcement of the company federally protected rights by this Court. (*Id.*)

d. The balance of the hardships tips strongly in Plaintiff's favor and issuing the injunctive relief is in the public's interest.

The next two inquiries presented for the issuance of the requested injunctive relief consider the balance of the hardships between the Plaintiff and the parties being restrained, and whether the issuing the injunction would be in the public's interest. *See Columbia Pictures Indus., Inc. v. Jasso*, 927 F. Supp. 1075, 1076 (N.D. Ill. 1996). Here, both factors support

granting Plaintiff's Motion.

Turning first to the balance of the hardships, Plaintiff has demonstrated a direct copying of its federally registered copyright protected images. [Dkt. No. 7-1.] In fact, the evidence presented raises an extremely strong inference that Defendants have willfully infringed Plaintiff's copyright protected works. Under these circumstances, very little, if any, deference should be given to any hardships experienced by Defendants should injunctive relief be entered in Plaintiff's favor.

1. The appearing Defendants argue that they are being disproportionately harmed because an unreasonable amount of their assets are being restrained by Amazon in comparison to Plaintiff's likely ability to disgorge their profits. [Dkt. No. 48, 49.] First, Plaintiff is in the process of entering into settlements with all appearing Defendants represented by Sam Mu (the "Mu Defendants"). (Supp. Mangano Decl. ¶ 21.) Second, Plaintiff has requested that all funds currently being restrained by Amazon for the Defendants represented by Adam Urbanczky (the "AU Defendants"). As such, Plaintiff has essentially resolved all asset restraint issues by the only two groups of Defendants that filed oppositions to the Motion for Preliminary Injunction – the AU Defendants [Dkt. No. 48] and the Mu Defendants [Dkt. No. 49]. (*Id.*) To the extent other represented, but non-appearing Defendants request a release of funds frozen by Amazon, Plaintiff is prepared to employ a 40% net profit analysis for identified infringing sales, which was approved by Judge Kennelly in issuing the Preliminary Injunction in the parallel Amazon copyright infringement action [Dkt. No. 80, 83]. (*Id.* ¶ 22.) Accordingly, the balance of the hardships tips strongly in Plaintiff's favor.

Likewise, issuance of the requested injunctive relief is in the public's interest. "The Copyright Act evidences a public interest in creativity by demonstrating an intent to provide an

economic reward for creative expression.” *Midway Mfg. Co. v. Artic Intern., Inc.*, 547 F.Supp. 999, 1015 (N.D. Ill. 1982). By granting Plaintiff’s Motion, the Court would be furthering that interest by rewarding the company’s development and dissemination of new styles, colors, and sizes of women’s clothing, which is visually displayed through its advertising and marketing images such as those reflected in its copyright protected works in this action. On the other hand, there would be no public interest furthered by allowing Defendants to continue to distribute and sell their counterfeit products through the unauthorized use of Plaintiff’s copyright protected images. Accordingly, the public’s interest would be strongly served by granting Plaintiff’s Motion.

B. The Current Bond is Sufficient to Protect Defendants’ Interests.

The Court has previously required Plaintiff to post a bond in the sum of \$10,000.00 in connection with issuance of the TRO. [Dkt. No. 24.] The exact same circumstances supporting the Court’s determination of this bond amount apply to Plaintiff’s request for entry of a preliminary injunction. (Supp. Mangano Decl. ¶ 23.) Moreover, the Court is presented with facts and supporting evidence that clearly demonstrates Defendants have infringed Plaintiff’s copyright protected works. (*Id.*) This blatant, intentional conduct demonstrates that Plaintiff has an exceptionally high likelihood of success on the merits of its asserted claims for relief. *See Columbia Pictures Indus., Inc.*, 927 F. Supp. at 1076. Such a strong showing militates against a subsequent finding that injunctive relief was improperly granted. To the extent the Court is inclined to increase the bond in this action any such increase should not exceed a total of bond amount of \$10,000.

III. CONCLUSION

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

Preliminary Injunction [Dkt. No. 29] and maintain the current bond amount posted for the TRO, together with issuing any other relief that it deems just and proper.

DATED: June 14, 2024

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on the 14th 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.

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THE INDIVIDUALS, CORPORATIONS,
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Honorable Martha M. Pacold

Magistrate Sheila M. Finnegan

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

I, Shawn A. Mangano, of the City of Las Vegas, in the State of Nevada, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this supplemental declaration in support of Plaintiff's Reply Brief in Support of Motion for Preliminary Injunction (the "Reply").

3. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff's Motion for Temporary Restraining Order (the "TRO") was granted by the Court on May 8, 2024. [Dkt. No. 20].

5. Plaintiff voluntarily revealed its identity in this action at the May 28, 2024 telephonic hearing in this matter. [Dkt. No. 38.]

6. At least a dozen Defendants in this action have already had a preliminary injunction entered against them for using Plaintiff's copyright protected images, without authorization, to sell counterfeit Rotita brand products on Amazon's website. Specifically, on June 5, 2024, Judge Matthew Kennelly (Case No. 1:24-cv-02939-MFK-BWJ) conducted a two-hour, in-person, hearing [Dkt. No. 80] and rejected the exact same arguments being raised by Defendants here. In his ruling, Judge Kennelly determined that joinder was proper, that personal jurisdiction could be exercised over the Defendants, and agreed with Plaintiff's approach in release a majority, if not all, the funds subject to Amazon's asset freeze. [Dkt. Nos. 80, 83.] As a result, Plaintiff's Motion for Preliminary Injunction was granted. [Dkt. No. 80.]

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

8. When Plaintiff decided to take action against these counterfeit sellers, it fully appreciated that once the company's identity was known and the related brand being protected was concomitantly revealed, counterfeit operators across all six online platforms would immediately delete links to their online accounts, halt access to their online sales records, and siphon any ill-

gotten gains held in their online accounts to offshore accounts beyond the jurisdiction of this Court. In addition, these bad actors would quickly disseminate all known information concerning Plaintiff and its brand enforcement efforts by Internet posts on such counterfeit seller website and message boards as “SellerDefense.cn.”

9. In fact, Defendant sellers have superficially sought information about numerous pending cases initiated in this judicial district including actions pending before this Court and before Judge Kendall, Judge Cummings, Judge Kennelly, and Judge Wood. As a result, each of these Courts determined that Plaintiff had established “exceptional circumstances” necessary to permit Plaintiff to proceed under a corporate pseudonym.

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

11. Plaintiff’s operative Complaint in this action is but one piece in a multi-action copyright enforcement campaign that seeks to dismantle a criminal network that operates through six (6) of the largest online retail platforms in existence and includes over 2,500 named Schedule

“A” Defendants. These named Schedule “A” Defendants are alleged to be engaged in the practice of copying Plaintiff’s copyright protected product images almost instantaneously after they are first displayed on the company’s website and then associating these images with sale and promotion of unauthorized, counterfeit products of substandard quality, thereby deceiving consumers – including the citizens of the State of Illinois. Moreover, given the nature of Plaintiff’s goods, such large-scale sales operations over multiple online retail platforms require considerable supply chain coordination that could not reasonably be accomplished independently by any of the named Defendants.

12. The sophistication of Defendants’ online, counterfeit sales network is further demonstrated by the skill with which they identify Schedule “A” plaintiffs, their allegedly infringed products or brands, and then immediately disseminating this information throughout their network by posting on online websites such as “SellerDefense.cn.” The dissemination of this information then immediately results in the named Defendants siphoning off all illicit funds held in their online accounts. (*Id.*) This results in plaintiffs being deprived of any meaningful opportunity to redress the harm caused by Defendants’ infringing conduct by attacking their financial resources. The multiple copyright enforcement actions commenced by Plaintiff in this judicial district have been specifically targeted by this tactic – including actions pending before Judge Cummings, Judge Kendall, Judge Wood, and Judge Pacold.

13. As also previously argued to this Court in support of its request for entry of a temporary restraining order, Plaintiff would unquestionably suffer irreparable harm absent entry of injunctive relief through the spoliation of essential evidence and Defendants absconding with significant ill-gotten gains derived from their intentional infringement of Plaintiff’s federally secured copyright protected works. These facts still exist today and support entry of preliminary

injunctive relief effective until full adjudication of this matter. Moreover, refusing to grant such relief would completely diminish the considerable financial resources paid by Plaintiff to secure the federal copyright registrations sought to be enforced in this action, and in the other ten (10) pending actions in this judicial district, and ignore the tens of millions of dollars spend by the company to promote and advertise the Rotita brand in the United States.

14. Defendants have directly targeted their counterfeit sales activities, through online sales platforms not utilized by Plaintiff, in the United States, including to the residents of the State of Illinois, through, at least, fully interactive, e-commerce stores operating under their designated aliases on the Amazon platform.

15. Specifically, Defendants have targeted online sales to Illinois residents by setting up, maintaining, and operating Amazon-based e-commerce stores using their seller aliases that target United States consumers, including residents of the State of Illinois, whereby these targeted sales individuals can purchase counterfeit Rotita brand products. A significant number of the Defendants, who are alleged to be acting in concert with one another and utilizing a common textile manufacturing source to secure their counterfeit products, have physically shipped products to Chicago, Illinois that used Plaintiff's copyright protected images without authorization on their Amazon online storefronts.

16. Plaintiff has employed the use of two third-party proprietary software programs that identifies sales made through Amazon that are associated with the items displaying its infringed copyright protected images. This has resulted in Plaintiff uncovering potential sales that greatly exceed those that have been disclosed by the Defendants.

17. Certainly, Plaintiff would seek to confirm these sales activities through third-party subpoena efforts directed to Amazon. Plaintiff would also be able to do so following entry of the

requested preliminary injunction, as well as to issue discovery specifically directed toward whether any of the appearing Defendants are operating multiple online Amazon stores with common ownership, which directly violates the platform's terms of use.

18. Plaintiff has specifically limited its claims against the identified Defendants because they have infringed the same or similar federally registered copyright protected works. Moreover, each of the named Defendants are Chinese nationals or entities accused of offering their counterfeit products through the Amazon platform. All the named Defendants are alleged to be engaged in an affiliated online network whereby they, at least, obtain their counterfeit goods through the same sources.

19. As with the issued TRO, Plaintiff requests issuance of the preliminary injunction to prevent the Defendants from using, without authorization, the company's copyright protected images in connection with the manufacture, importation, distribution, offering for sale, and sale of counterfeit products. Absent issuance of this requested preliminary injunctive relief, Defendants' intentional infringement of Plaintiff's federally secured rights will unquestionably continue. This results in the direct harm to Plaintiff's brand reputation and loss of consumer goodwill, both of which are harms that are virtually impossible to ascertain the resulting economic loss.

20. Plaintiff also requests conversion of the TRO to a preliminary injunction so that Defendants' online accounts, which contain essential illegal product sales information and ill-gotten funds derived from their intentional infringement of the company's copyright protected works that would otherwise be transferred to unknown locales, remain frozen until conclusion of this action. This same harm justified entry of the TRO and it continues to exist today, which clearly justifies entry of the requested preliminary injunction. Simply put, absent extending the relief

granted under the TRO to a preliminary injunction, Plaintiff would be irreparably harmed through Defendants' efforts to avoid enforcement of the company federally protected rights by this Court.

21. The appearing Defendants argue that they are being disproportionately harmed because an unreasonable amount of their assets are being restrained by Amazon in comparison to Plaintiff's likely ability to disgorge their profits. [Dkt. No. 48, 49.] First, Plaintiff is in the process of entering into settlements with all appearing Defendants represented by Sam Mu (the "Mu Defendants"). Second, Plaintiff has requested that all funds currently being restrained by Amazon for the Defendants represented by Adam Urbanczky (the "AU Defendants"). As such, Plaintiff has essentially resolved all asset restraint issues by the only two groups of Defendants that filed oppositions to the Motion for Preliminary Injunction – the AU Defendants [Dkt. No. 48] and the Mu Defendants [Dkt. No. 49].

22. To the extent other represented, but non-appearing Defendants request a release of funds frozen by Amazon, Plaintiff is prepared to employ a 40% net profit analysis for identified infringing sales, which was approved by Judge Kennelly in issuing the Preliminary Injunction in the parallel Amazon copyright infringement action. [Dkt. No. 80, 83.]

23. The Court has previously required Plaintiff to post a bond in the sum of \$10,000.00 in connection with issuance of the TRO. [Dkt. No. 24.] The exact same circumstances supporting the Court's determination of this bond amount apply to Plaintiff's request for entry of a preliminary injunction. Moreover, the Court is presented with facts and supporting evidence that clearly demonstrates Defendants have infringed Plaintiff's copyright protected works.

24. In *Volkswagen AG, et al. v. hkseller*2011, et al.*, No. 18-cv-07621 (N.D. Ill. May 6, 2019), the Court found that the defendants deliberately evaded asset restraint. Despite assurances, defendants depleted their PayPal account before a hearing. When the restraint was

reinstated, they swiftly withdrew \$20,000. With their counsel withdrawing and no response to plaintiffs' motion for summary judgment, a \$200,000 judgment was entered, which remains unpaid beyond the restrained funds.

25. In *PopSockets LLC v. Xuebo50, et al.*, No. 17-cv-06101 (N.D. Ill. Oct. 12, 2017), a defendant's PayPal account, initially holding \$1,611,921, was restrained. The account was released under the condition that several hundred thousand dollars, earmarked for potential consumer chargebacks, couldn't be withdrawn. However, due to a misunderstanding with PayPal, the defendant reduced the balance to \$36,469 upon receiving notice of the lawsuit. The defendant didn't appear in the case, resulting in a default judgment entered against them.

26. In my experience, even when defendants cannot access funds from their accounts, they often resort to alternative tactics to evade asset restraints. For instance, in *Monster Energy Company v. Zuichudesecai, et al.*, No. 19-cv-00551 (N.D. Ill. Aug. 8, 2019), the defendant's PayPal account was initially frozen with a balance of \$72,370. After securing legal representation and filing a motion to dismiss, the defendant's motion was rejected, leading to their attorney withdrawing from the case. Despite court orders to find new representation or respond to the claims, the defendant failed to do so, resulting in a default judgment against them. Yet, during the legal proceedings, the defendant clandestinely collaborated with buyers to initiate chargebacks, causing the account balance to plummet to -\$17,657.

27. For these reasons, in the absence of issuance of the requested preliminary injunction, Defendants would likely move any assets from accounts in financial institutions subject to this Court's jurisdiction to offshore accounts outside of this Court's jurisdiction.

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

Executed on June 14, 2024, in Las Vegas, Nevada.

By: /s/ Shawn A. Mangano
SHAWN A. MANGANO, ESQ.

CERTIFICATE OF SERVICE

I hereby certify that on the 14th 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.

By: /s/ Shawn A. Mangano
Shawn A. Mangano (Bar No. 6299408)
BAYRAMOGLU LAW OFFICES LLC
1540 West Warm Springs Road Ste. 100
Henderson, NV 89014
Tel: (702) 462-5973 Fax: (702) 553-3404
shawnmangano@bayramoglu-legal.com
Attorneys for Plaintiff

**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-MMP-SMF

Honorable Martha M. Pacold

Magistrate Sheila M. Finnegan

**DECLARATION OF JOSEPH W. DROTER, ESQ. IN SUPPORT OF MOTION TO
ENTER PRELIMINARY INJUNCTION**

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

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Reply in Support of Motion for Preliminary Injunction.

3. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

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

5. Defendant MOJICK has used the federally registered copyright image protected by VA0002384827 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois. This same Defendant has used another Rotita owned unregistered copyright protected image without authorization in the sale of one other counterfeit product being shipped to Chicago, Illinois. Defendant MOJICK is also a named Defendant in Case No. 1:24-cv-02939-MFK (the "Judge Kennelly Case") that involves Plaintiff's enforcement of its copyright protected images being used without authorization to sell counterfeit Rotita brand products on the Amazon

online platform. This Defendant has been found to be subject to personal jurisdiction in this judicial district by Judge Kennelly and a preliminary injunction has been entered against it [Dkt. No. 83].

6. Defendant Bttup has used the federally registered copyright image protected by VA0002379911 without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois. This same Defendant has used another Rotita owned unregistered copyright protected image without authorization in the sale of one other counterfeit product being shipped to Chicago, Illinois. Defendant Bttup is also a named Defendant in the Judge Kennelly Case that involves Plaintiff's enforcement of its copyright protected images being used without authorization to sell counterfeit Rotita brand products on the Amazon online platform. This Defendant has been found to be subject to personal jurisdiction in this judicial district by Judge Kennelly and a preliminary injunction has been entered against it [Dkt. No. 83].

7. This Defendant LaiyiVic has used a Rotita owned unregistered copyright protected image without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.

8. Defendant MsavigVice has used a Rotita owned unregistered copyright protected image without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.

9. Defendant SeNight has used a Rotita owned unregistered copyright protected image without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois.

10. Defendant HugeNice has used a Rotita owned unregistered copyright protected image without authorization in the sale of two (2) counterfeit products being shipped to Chicago, Illinois. Defendant HugeNice is also a named Defendant in the Judge Kennelly Case that involves Plaintiff's enforcement of its copyright protected images being used without authorization to sell

counterfeit Rotita brand products on the Amazon online platform. This Defendant has been found to be subject to personal jurisdiction in this judicial district by Judge Kennelly and a preliminary injunction has been entered against it [Dkt. No. 83].

11. Defendant IbuduSexy has used a Rotita owned unregistered copyright protected image without authorization in the sale of one counterfeit product being shipped to Chicago, Illinois. Defendant IbuduSexy is also a named Defendant in the Judge Kennelly Case that involves Plaintiff's enforcement of its copyright protected images being used without authorization to sell counterfeit Rotita brand products on the Amazon online platform. This Defendant has been found to be subject to personal jurisdiction in this judicial district by Judge Kennelly and a preliminary injunction has been entered against it [Dkt. No. 83].

12. The above transactions are described in greater detail below. They are also replicated in a chart, a true and correct copy of which is attached hereto as Exhibit "A".

13. On June 3, 2024, Lilly P. O'Dea placed order number 111-0277422-5569073 on Amazon.com, ordering products: 1. Womens Elegant Sleeveless Lace Dresses Wedding Guest Bodycon Pencil Dress Sexy Floral Cocktail Party Mini Dress; 2. Bttup Off Shoulder Wrap Dress for Women Mesh Sleeve Wrap Dress Party Dress Casual Long Flare Bell Sleeve Dresses Sheath Cocktail Party Outfits Black; 3. Sexy Long Sleeve Mermaid Maxi Dress for Women Elegant Formal One Shoulder Red Evening Gown with Zipper X-Large; 4. LaiyiVic Maxi Dress for Women Casual Long Dress Colorful Print Round Neck Short Sleeve Summer Dress with Pockets Black X-Large; 5. IbuduSexy Half Sleeve Dress Color Block Casual Crew Neck Church Dresses for Women with Belt Black; 6. Pencil Dress for Women Bodycon Elegant Off Shoulder Long Bell Sleeve Vintage Sheath Dresses with Zipper; 7. SeNight Women's Dress Work Business Church Dresses Bodycon Half Ruffles Sleeve Round Neck Blue Floral Pencil Dresses with Bow Tie; 8.

MsavigVice Maxi Dresses for Women Casual Button Down V Neck Womens Loose Floor Length Dress with Belt; 9. Women's 2 Piece Business Skirt Suit Casual Black Blazer Jackets and Pencil Midi Skirt Work Professional Sets with Buttons. These products are sold by Defendants: Bttup; HugeNice; LaiyiVic; IbuduSexy, MOJICK; SeNight; and MsavigVice, in this action. These products are scheduled to be delivered to Chicago, Illinois

14. Attached as Exhibit “B” are true and correct copies of screenshots of the confirmation order indicating the products will be shipped to Illinois and the status of shipped items to Illinois.

15. Attached as Exhibit “C” are true and correct copies of photos of the packaging received in Chicago, Illinois and products contained therein.

16. When reviewing the product listings as of the date of ordering, the products were active and the seller indicated they’re willing and able to continue to sell and ship to Illinois residents by allowing consumers to add items to their online carts and order.

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

Executed on June 14, 2024 in Chicago, Illinois.

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

CERTIFICATE OF SERVICE

I hereby certify that on the 14th 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.

By: /s/ Joseph W. Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC
1540 West Warm Springs Road Ste. 100
Henderson, NV 89014
Tel: (702) 462-5973 Fax: (702) 553-3404
Joseph@bayramoglu-legal.com
Attorneys for Plaintiff

EXHIBIT A


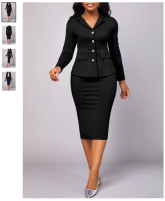
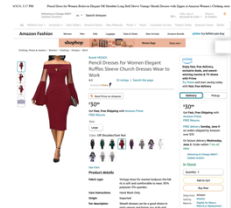






Seller	Purchased Item	Copyrighted Photo	Registered Copyright	Link to Infringing Photo
MOJICK			VA0002384827	https://www.amazon.com/dp/B0CJ4HZNPH?psc=1
MOJICK			Protected Image	https://www.amazon.com/dp/B0C93627MM?psc=1
IbuduSexy			Protected Image	https://www.amazon.com/dp/B0BVM2VJSC?psc=1
Bttup			Protected Image	https://www.amazon.com/dp/B0C9SSVHQM?psc=1
HugeNice			Protected Image	https://www.amazon.com/dp/B0BRR742XX?psc=1

EXHIBIT B

Delivering to Chicago 60657
Update location

All Search Amazon

EN Hello, sign in Account & Lists Returns & Orders 0

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Amazon Fashion Women Men Kids Luggage Sales & Deals New Arrivals Amazon Brands prime try before you buy

Clothing, Shoes & Jewelry Women Clothing Dresses Casual



Visit the LaiyiVic Store

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

3.7 70 ratings | Search this page

Best Price on Amazon

\$35⁹⁹

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

Size:
X-Large

Color: Color11337-1



Size Chart

Product details

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

About this item

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

See more

Report an issue with this product or seller

Similar item with fast delivery



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



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Delivery

Pickup

\$35⁹⁹

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In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by LaiyiVic
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Packaging Ships in product packaging

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Clothing, Shoes & Jewelry Women Clothing Dresses Casual



Visit the MsavigVice Store

MsavigVice Maxi Dresses for Women Button Down with Pockets Long Dress Casual V Neck Floral Print Loose Prom Dresses Outfits

4.1 1,875 ratings | Search this page

Best Price on Amazon

\$37⁹⁹

FREE Returns

Size:

Medium

Color: Wine Red10664-1



Size Chart

Product details

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

About this item

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

See more

Report an issue with this product or seller



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Delivery

Pickup

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Only 1 left in stock - order soon.

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Buy Now

Ships from Amazon
Sold by MsavigVice
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Packaging Ships in product packaging

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Amazon Fashion

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Clothing, Shoes & Jewelry Women Clothing Dresses Work



Visit the SeNight Store

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

4.1 330 ratings | Search this page

Best Price on Amazon

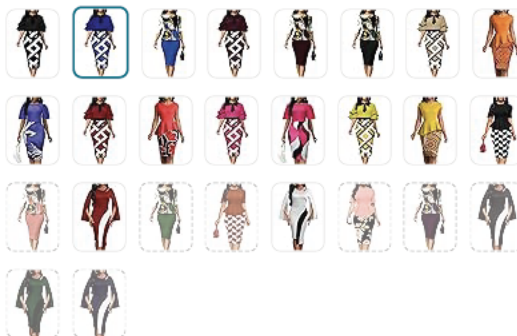
\$29.99

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Size:

Medium

Color: Blue-a



Size Chart

Product details

Fabric type	95% Polyester, 5% Spandex
Origin	Imported
Fur description	Made of soft surface, light and comfortable.
Closure type	Pull On
Country of Origin	China

About this item

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

See more

Report an issue with this product or seller



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Delivery

Pickup

\$29.99

Get Fast, Free Shipping with Amazon Prime
FREE Returns

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

Or fastest delivery June 20 - July 3

Delivering to Chicago 60657 - Update location

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by SeNight
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Packaging Ships in product packaging

See more

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Subtotal
\$38.99

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Clothing, Shoes & Jewelry Women Clothing Dresses



Brand: Bttup

Womens Elegant Sleeveless Lace Dresses Wedding Guest Bodycon Pencil Dress Sexy Floral Cocktail Party Mini Dress

5.0 2 ratings | Search this page

Best Price on Amazon

-7% \$12.99

Typical price: \$13.99

Get Fast, Free Shipping with Amazon Prime

FREE Returns

Size Chart

Product details

Fabric type	95%polyester 5%spandex.Elegant dresses for women made of stretchy,soft fabric,comfortable to wear.
Care instructions	Machine Wash
Origin	Imported
Fur description	Work or leisure life elegant Party dresses for women help you get many compliments
Country of Origin	China

About this item

- Round neck, fluttering short sleeve, or sleeveless, lined,

See more

Report an issue with this product or seller



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Delivery

Pickup

\$12.99

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FREE Returns

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

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Delivering to Chicago 60657 - Update location

Only 1 left in stock order soon.

Add to Cart

Buy Now

Ships from Amazon
Sold by Bttup
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Packaging Ships in product packaging

See more

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Clothing, Shoes & Jewelry Novelty & More Clothing Novelty Women Dresses



Visit the HugeNice Store

Women's Sexy Off Shoulder Bodycon Maxi Dresses Casual Short Sleeve Mermaid Club Party Long Dress

4.1 134 ratings | Search this page

1 Price Change

\$44⁹⁹

FREE Returns

Size:

X-Large

Color: 5523red



Size Chart

Product details

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

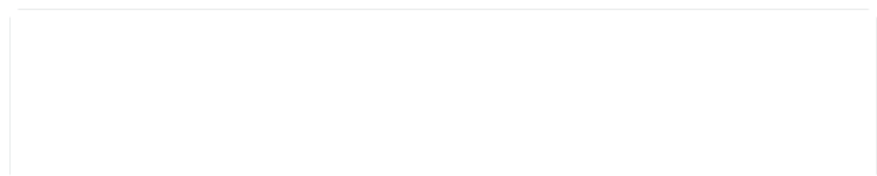
Care instructions Machine Wash

Origin Imported

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

See more

Report an issue with this product or seller



Sponsored

prime
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Try Prime and start saving today with fast, free delivery

Delivery Pickup

\$44⁹⁹

FREE Returns

FREE delivery Sunday, June 9

Or fastest delivery Wednesday, June 5. Order within 13 hrs 43 mins

Delivering to Chicago 60657 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by HugeNice
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Packaging Ships in product packaging

See more

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Brand: Bttup

Women's Casual Long Flare Bell Sleeve Dress Print Off Shoulder Trumpet Sleeve Wrap Dress Party Dress

3.8 31 ratings | Search this page

Best Price on Amazon

-7% \$27⁹⁹

Typical price: \$29.99

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Size:

Medium

Color: Black



Size Chart

Product details

Care instructions	Machine Wash, Hand Wash Only
Origin	Imported
Closure type	Tie
Neck style	Scoop Neck
Country of Origin	China

About this item

- The faux wrap dress are designed by soft material and slim style. It's comfortable to touch your skin, stretchy and not see through, breathable and fashionable.
- Off Shoulder Wrap Dress for Women Mesh Sleeve Wrap Dress Party Dress Casual Long Flare Bell Sleeve Dresses Sheath Cocktail Party Outfits

See more

Report an issue with this product or seller

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Delivery Pickup

\$27⁹⁹

Get Fast, Free Shipping with Amazon Prime
FREE Returns

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

Or fastest delivery Wednesday, June 5. Order within 7 hrs 43 mins

Delivering to Chicago 60657
Update location

Only 5 left in stock order soon.

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by Bttup
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Payment Secure transaction

Add a gift receipt for easy returns

Add to List

Sponsored

Delivering to Chicago 60657
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All Search Amazon

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Woven Bags

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Clothing, Shoes & Jewelry Women Clothing Dresses Work



Brand: MOJICK

Pencil Dresses for Women Elegant Ruffles Sleeve Church Dresses Wear to Work

4.2 32 ratings | Search this page

Amazon's Choice

Best Price on Amazon

\$30⁹⁹

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Size:

Large

Color: Off Shoulder/Dark Red



Size Chart

Product details

Fabric type	Vintage dress for women bodycon the fabric is soft and comfortable to wear. 95% polyester 5% spandex.
Care instructions	Hand Wash Only
Origin	Imported
Fur description	Sheath dresses can be a good choice in most venues and brings you style and confidence.
Country of Origin	China

About this item

- Peplum pencil dress for women features off shoulder, long bell sleeve, keyhole vintage bodycon dress.

See more

Report an issue with this product or seller



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Try Prime and start saving today with fast, free delivery

Delivery

Pickup

\$30⁹⁹

Get Fast, Free Shipping with Amazon Prime
FREE Returns

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

Or fastest delivery Wednesday, June 5. Order within 7 hrs 42 mins

Delivering to Chicago 60657 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon

Sold by MOJICK

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

Payment

Add a gift receipt for easy returns

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Styling ideas

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Clothing, Shoes & Jewelry Women Clothing Dresses Casual



Visit the IbuduSexy Store

IbuduSexy Women Maxi Dress Long Dress Casual V Neck Loose Prom Dresses Button Down Dress

3.8 171 ratings | Search this page

Best Price on Amazon

-13% \$25⁹⁹

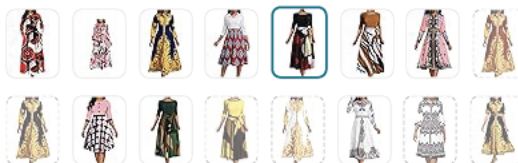
Typical price: \$29.99

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Size:

Medium

Color: A-black



Size Chart

Product details

Care instructions	Hand Wash Only
Origin	Imported
Closure type	Zipper
Neck style	Crew Neck
Country of Origin	China

About this item

- Rosewe dresses for women,Crew Neck,half-sleeve,Solid color on the top half,color block on the bottom half with Belt.
- Half sleeve dress is super soft can be easily dress up or dress down,unique style create stunning curves,make you more beautiful,fashion,sexy and elegant.

See more

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\$25⁹⁹

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Quantity: 1

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Sold by IbuduSexy
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Packaging Ships in product packaging

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Brand: MOJICK

Pencil Dresses for Women Elegant Ruffles Sleeve Church Dresses Wear to Work

4.2 32 ratings | Search this page

Amazon's Choice

Best Price on Amazon

\$30⁹⁹

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Size:

Large

Color: Off Shoulder/Dark Red



Size Chart

Product details

Fabric type	Vintage dress for women bodycon the fabric is soft and comfortable to wear. 95% polyester 5% spandex.
Care instructions	Hand Wash Only
Origin	Imported
Fur description	Sheath dresses can be a good choice in most venues and brings you style and confidence.
Country of Origin	China

About this item

- Peplum pencil dress for women features off shoulder, long bell sleeve, keyhole vintage bodycon dress.

See more

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Clothing, Shoes & Jewelry Women Clothing Suiting & Blazers Suit Sets



Brand: MOJICK

Women's 2 Piece Outfits Business Work Clothes Blazer Jacket and Skirt Set Suits

3.2 21 ratings | Search this page

1 Price Change

13% \$39⁹⁹

Typical price: \$45.99

FREE Returns

Size:

Medium

Color: Blazer/Black



Size Chart

Product details

Fabric type	Blazer and skirt set the fabric is soft and comfortable to wear. 95% polyester 5% spandex.
Care instructions	Hand Wash Only
Origin	Imported
Fur description	Blazer skirt set suits work clothes can be a good choice in most venues and brings you style and confidence.
Country of Origin	China

About this item

- Women's blazers and skirt with front slit design effortless business freedom style.

See more

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Similar item with fast delivery

Amazon's Choice



Allegra K Women's 2 Piece Suit Skirt Set Business Casual Long Sleeve Blazer and Pencil Skirt (84)

\$55.99



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Pickup

\$39⁹⁹

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Buy it with



Details for Order #111-0277422-5569073

[Print this page for your records.](#)

Order Placed: June 3, 2024

Amazon.com order number: 111-0277422-5569073

Order Total: \$484.27

Not Yet Shipped

Items Ordered

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

Condition: New

1 of: *IbuduSexy Half Sleeve Dress Color Block Casual Crew Neck Church Dresses for Women with Belt Black* \$25.99Sold by: IbuduSexy ([seller profile](#))

Supplied by: Other

Condition: New

1 of: *Pencil Dress for Women Bodycon Elegant Off Shoulder Long Bell Sleeve Vintage Sheath Dresses with Zipper* \$30.99Sold by: MOJICK ([seller profile](#))

Supplied by: Other

Condition: New

1 of: *SeNight Women's Dress Work Business Church Dresses Bodycon Half Ruffles Sleeve Round Neck Blue Floral Pencil Dresses with Bow Tie* \$29.99Sold by: SeNight ([seller profile](#))

Supplied by: Other

Condition: New

1 of: *MsavigVice Maxi Dresses for Women Casual Button Down V Neck Womens Loose Floor Length Dress with Belt* \$37.99Sold by: MsavigVice ([seller profile](#))

Supplied by: Other

Condition: New

1 of: *Women's 2 Piece Business Skirt Suit Casual Black Blazer Jackets and Pencil Midi Skirt Work Professional Sets with Buttons* \$39.99Sold by: MOJICK ([seller profile](#))

Supplied by: Other

Condition: New

1 of: *Women Dress Elegant Peplum Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper Dress White* \$35.99Sold by: Yiershu ([seller profile](#))

Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Shipping Speed:

FREE Prime Delivery

Payment information**Payment Method:**

Visa ending in 8357

Item(s) Subtotal: \$439.26

Shipping & Handling: \$0.00

Total before tax: \$439.26

Estimated tax to be collected: \$45.01

Billing address

Lilly O'Dea

CHICAGO, IL 60613-5656

United States

Grand Total: \$484.27To view the status of your order, return to [Order Summary](#).

EXHIBIT C

Order Number 111-0277422-5569073
Defendant IbuduSexy



Order Number 111-0277422-5569073
Defendant MsavigVice



Order Number 111-0277422-5569073
Defendant MOJICK



Order Number 111-0277422-5569073
Defendant Bttup



Order Number 111-0277422-5569073
Defendant MOJICK



Order Number 111-0277422-5569073
Defendant HugeNice



**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-MMP-SMF

Honorable Martha M. Pacold

Magistrate Sheila M. Finnegan

DECLARATION OF LILLY P. O'DEA

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

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Reply in Support of Motion for Preliminary Injunction (the "Reply").

3. I am an individual residing in the State of Illinois. I make this declaration from my matters within my own knowledge unless stated otherwise herein.

4. On June 3, 2024, I placed order number 111-0277422-5569073 on Amazon.com, ordering products: 1. Womens Elegant Sleeveless Lace Dresses Wedding Guest Bodycon Pencil Dress Sexy Floral Cocktail Party Mini Dress; 2. Bttup Off Shoulder Wrap Dress for Women Mesh Sleeve Wrap Dress Party Dress Casual Long Flare Bell Sleeve Dresses Sheath Cocktail Party

Outfits Black; 3. Sexy Long Sleeve Mermaid Maxi Dress for Women Elegant Formal One Shoulder Red Evening Gown with Zipper X-Large; 4. LaiyiVic Maxi Dress for Women Casual Long Dress Colorful Print Round Neck Short Sleeve Summer Dress with Pockets Black X-Large; 5. IbuduSexy Half Sleeve Dress Color Block Casual Crew Neck Church Dresses for Women with Belt Black; 6. Pencil Dress for Women Bodycon Elegant Off Shoulder Long Bell Sleeve Vintage Sheath Dresses with Zipper; 7. SeNight Women's Dress Work Business Church Dresses Bodycon Half Ruffles Sleeve Round Neck Blue Floral Pencil Dresses with Bow Tie; 8. MsavigVice Maxi Dresses for Women Casual Button Down V Neck Womens Loose Floor Length Dress with Belt; 9. Women's 2 Piece Business Skirt Suit Casual Black Blazer Jackets and Pencil Midi Skirt Work Professional Sets with Buttons. These products are sold by Defendants: Bttup; HugeNice; LaiyiVic; IbuduSexy, MOJICK; SeNight; and MsavigVice, in this action. These products are scheduled to be delivered to Chicago, Illinois.

5. Attached as Exhibit “1” are true and correct copies of screenshots of the confirmation order indicating the products will be shipped to Illinois and the status of shipped items to Illinois.

6. Attached as Exhibit “2” true and correct copies of photographs of the packaging received and products contained therein.

7. Upon reviewing the product listings as of the date of this filing, the products remain active and the seller indicating they’re willing and able to continue to sell and ship to Illinois residents by allowing consumers to add items to their online carts and order.

///

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

Executed on June 14, 2024, in Chicago, Illinois.

By: /s/ Lilly P. O'Dea
LILLY P. O'DEA

EXHIBIT 1

Delivering to Chicago 60657
Update location

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Clothing, Shoes & Jewelry Women Clothing Dresses Casual



Visit the LaiyiVic Store

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

3.7 70 ratings | Search this page

Best Price on Amazon

\$35⁹⁹

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

Size:

X-Large

Color: Color11337-1



Size Chart

Product details

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

About this item

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

See more

Report an issue with this product or seller

Similar item with fast delivery



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

\$39.99



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Delivery Pickup

\$35⁹⁹

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In Stock

Quantity: 1

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Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Packaging Ships in product packaging

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Clothing, Shoes & Jewelry Women Clothing Dresses Casual



Visit the MsavigVice Store

MsavigVice Maxi Dresses for Women Button Down with Pockets Long Dress Casual V Neck Floral Print Loose Prom Dresses Outfits

4.1 1,875 ratings | Search this page

Best Price on Amazon

\$37⁹⁹

FREE Returns

Size:

Medium

Color: Wine Red10664-1



Size Chart

Product details

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

About this item

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

See more

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Packaging Ships in product packaging

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Clothing, Shoes & Jewelry Women Clothing Dresses Work



Visit the SeNight Store

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

4.1 330 ratings | Search this page

Best Price on Amazon

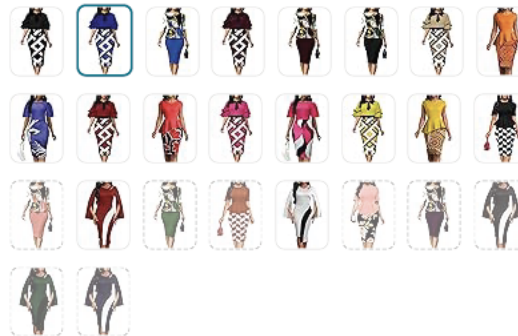
\$29.99

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Size:

Medium

Color: Blue-a



Size Chart

Product details

Fabric type	95% Polyester, 5% Spandex
Origin	Imported
Fur description	Made of soft surface, light and comfortable.
Closure type	Pull On
Country of Origin	China

About this item

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

See more

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Sold by SeNight
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Packaging Ships in product packaging

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Subtotal
\$38.99

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Brand: Bttup Womens Elegant Sleeveless Lace Dresses Wedding Guest Bodycon Pencil Dress Sexy Floral Cocktail Party Mini Dress

5.0 2 ratings | Search this page

Best Price on Amazon

-7% \$12.99
Typical price: \$13.99

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FREE Returns

Size Chart

Product details

Fabric type	95%polyester 5%spandex.Elegant dresses for women made of stretchy,soft fabric,comfortable to wear.
Care instructions	Machine Wash
Origin	Imported
Fur description	Work or leisure life elegant Party dresses for women help you get many compliments
Country of Origin	China

About this item

- Round neck, fluttering short sleeve, or sleeveless, lined,

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Packaging Ships in product packaging

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Visit the HugeNice Store

Women's Sexy Off Shoulder Bodycon Maxi Dresses Casual Short Sleeve Mermaid Club Party Long Dress

4.1 134 ratings | Search this page

1 Price Change

\$44⁹⁹

FREE Returns

Size:

X-Large

Color: 5523red



Size Chart

Product details

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

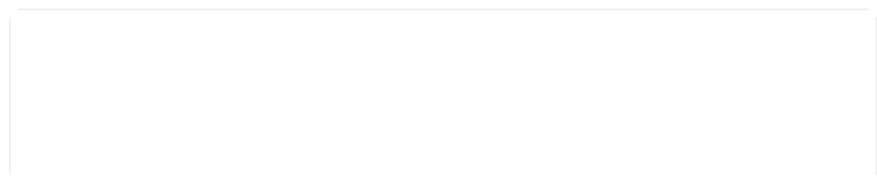
Care instructions Machine Wash

Origin Imported

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

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Quantity: 1

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Sold by HugeNice
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Brand: Bttup

Women's Casual Long Flare Bell Sleeve Dress Print Off Shoulder Trumpet Sleeve Wrap Dress Party Dress

3.8 31 ratings | Search this page

Best Price on Amazon

-7% \$27⁹⁹

Typical price: ~~\$29.99~~

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Size:

Medium

Color: Black



Size Chart

Product details

Care instructions	Machine Wash, Hand Wash Only
Origin	Imported
Closure type	Tie
Neck style	Scoop Neck
Country of Origin	China

About this item

- The faux wrap dress are designed by soft material and slim style. It's comfortable to touch your skin, stretchy and not see through, breathable and fashionable.
- Off Shoulder Wrap Dress for Women Mesh Sleeve Wrap Dress Party Dress Casual Long Flare Bell Sleeve Dresses Sheath Cocktail Party Outfits

See more

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Only 5 left in stock order soon.

Quantity: 1

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Buy Now

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Clothing, Shoes & Jewelry Women Clothing Dresses Work



Brand: MOJICK

Pencil Dresses for Women Elegant Ruffles Sleeve Church Dresses Wear to Work

4.2 32 ratings | Search this page

Amazon's Choice

Best Price on Amazon

\$30⁹⁹

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Size:

Large

Color: Off Shoulder/Dark Red



Size Chart

Product details

Fabric type	Vintage dress for women bodycon the fabric is soft and comfortable to wear. 95% polyester 5% spandex.
Care instructions	Hand Wash Only
Origin	Imported
Fur description	Sheath dresses can be a good choice in most venues and brings you style and confidence.
Country of Origin	China

About this item

- Peplum pencil dress for women features off shoulder, long bell sleeve, keyhole vintage bodycon dress.

See more

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Visit the IbuduSexy Store

IbuduSexy Women Maxi Dress Long Dress Casual V Neck Loose Prom Dresses Button Down Dress

3.8 171 ratings | Search this page

Best Price on Amazon

-13% \$25⁹⁹

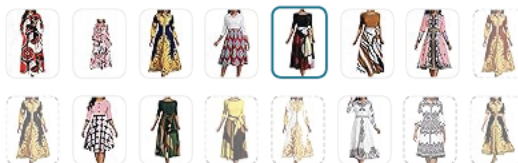
Typical price: ~~\$29.99~~

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Size:

Medium

Color: A-black



Size Chart

Product details

Care instructions	Hand Wash Only
Origin	Imported
Closure type	Zipper
Neck style	Crew Neck
Country of Origin	China

About this item

- Rosewe dresses for women,Crew Neck,half-sleeve,Solid color on the top half,color block on the bottom half with Belt.
- Half sleeve dress is super soft can be easily dress up or dress down,unique style create stunning curves,make you more beautiful,fashion,sexy and elegant.

See more

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Delivery

Pickup

\$25⁹⁹

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FREE Returns

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

Or fastest delivery Wednesday, June 5. Order within 13 hrs 42 mins

Delivering to Chicago 60657 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon
Sold by IbuduSexy
Returns Eligible for Return, Refund or Replacement within 30 days of receipt
Packaging Ships in product packaging

See more

Add a gift receipt for easy returns

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Styling ideas

Delivering to Chicago 60657
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Clothing, Shoes & Jewelry Women Clothing Dresses Work



Brand: MOJICK

Pencil Dresses for Women Elegant Ruffles Sleeve Church Dresses Wear to Work

4.2 32 ratings | Search this page

Amazon's Choice

Best Price on Amazon

\$30⁹⁹

Get Fast, Free Shipping with Amazon Prime
FREE Returns

Size:

Large

Color: Off Shoulder/Dark Red



Size Chart

Product details

Fabric type	Vintage dress for women bodycon the fabric is soft and comfortable to wear. 95% polyester 5% spandex.
Care instructions	Hand Wash Only
Origin	Imported
Fur description	Sheath dresses can be a good choice in most venues and brings you style and confidence.
Country of Origin	China

About this item

- Peplum pencil dress for women features off shoulder, long bell sleeve, keyhole vintage bodycon dress.

See more

Report an issue with this product or seller



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Try Prime and start saving today with fast, free delivery

Delivery

Pickup

\$30⁹⁹

Get Fast, Free Shipping with Amazon Prime
FREE Returns

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

Or fastest delivery Wednesday, June 5. Order within 7 hrs 42 mins

Delivering to Chicago 60657 - Update location

In Stock

Quantity: 1

Add to Cart

Buy Now

Ships from Amazon

Sold by MOJICK

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

Payment

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Clothing, Shoes & Jewelry Women Clothing Suiting & Blazers Suit Sets



Brand: MOJICK

Women's 2 Piece Outfits Business Work Clothes Blazer Jacket and Skirt Set Suits

3.2 21 ratings | Search this page

1 Price Change

13% \$39⁹⁹

Typical price: \$45.99

FREE Returns

Size:

Medium

Color: Blazer/Black



Size Chart

Product details

Fabric type	Blazer and skirt set the fabric is soft and comfortable to wear. 95% polyester 5% spandex.
Care instructions	Hand Wash Only
Origin	Imported
Fur description	Blazer skirt set suits work clothes can be a good choice in most venues and brings you style and confidence.
Country of Origin	China

About this item

- Women's blazers and skirt with front slit design effortless business freedom style.

See more

Report an issue with this product or seller

Similar item with fast delivery

Amazon's Choice



Allegra K Women's 2 Piece Suit Skirt Set Business Casual Long Sleeve Blazer and Pencil Skirt (84)

\$55.99



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Delivery

Pickup

\$39⁹⁹

FREE Returns

FREE delivery Sunday, June 9

Or fastest delivery Saturday, June 8. Order within 10 hrs 27 mins

Delivering to Chicago 60657 Update location

Only 1 left in stock - order soon.

Add to Cart

Buy Now

Ships from Amazon Sold by MOJICK Returns Eligible for Return, Refund or Replacement within 30 days of receipt Payment Secure transaction

Add a gift receipt for easy returns

Add to List

Buy it with



Details for Order #111-0277422-5569073

[Print this page for your records.](#)

Order Placed: June 3, 2024

Amazon.com order number: 111-0277422-5569073

Order Total: \$484.27

Not Yet Shipped

Items Ordered

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

Condition: New
 1 of: *IbuduSexy Half Sleeve Dress Color Block Casual Crew Neck Church Dresses for Women with Belt Black* \$25.99
 Sold by: IbuduSexy ([seller profile](#))
 Supplied by: Other

Condition: New
 1 of: *Pencil Dress for Women Bodycon Elegant Off Shoulder Long Bell Sleeve Vintage Sheath Dresses with Zipper* \$30.99
 Sold by: MOJICK ([seller profile](#))
 Supplied by: Other

Condition: New
 1 of: *SeNight Women's Dress Work Business Church Dresses Bodycon Half Ruffles Sleeve Round Neck Blue Floral Pencil Dresses with Bow Tie* \$29.99
 Sold by: SeNight ([seller profile](#))
 Supplied by: Other

Condition: New
 1 of: *MsavigVice Maxi Dresses for Women Casual Button Down V Neck Womens Loose Floor Length Dress with Belt* \$37.99
 Sold by: MsavigVice ([seller profile](#))
 Supplied by: Other

Condition: New
 1 of: *Women's 2 Piece Business Skirt Suit Casual Black Blazer Jackets and Pencil Midi Skirt Work Professional Sets with Buttons* \$39.99
 Sold by: MOJICK ([seller profile](#))
 Supplied by: Other

Condition: New
 1 of: *Women Dress Elegant Peplum Business Dresses Sexy Split Long Sleeve Bodycon Knee Length Formal Pencil Back Zipper Dress White* \$35.99
 Sold by: Yiershu ([seller profile](#))
 Supplied by: Other

Condition: New

Shipping Address:

Lilly O'Dea
 [REDACTED]
 CHICAGO, IL 60613-5656
 United States

Shipping Speed:

FREE Prime Delivery

Payment information

Payment Method:
 Visa ending in 8357

Billing address
 Lilly O'Dea
 [REDACTED]
 CHICAGO, IL 60613-5656
 United States

Item(s) Subtotal:	\$439.26
Shipping & Handling:	\$0.00

Total before tax:	\$439.26
Estimated tax to be collected:	\$45.01

Grand Total:	\$484.27

To view the status of your order, return to [Order Summary](#).

EXHIBIT 2

Order Number 111-0277422-5569073
Defendant IbuduSexy



Order Number 111-0277422-5569073
Defendant MsavigVice



Order Number 111-0277422-5569073
Defendant MOJICK



Order Number 111-0277422-5569073
Defendant Bttup



Order Number 111-0277422-5569073
Defendant MOJICK



Order Number 111-0277422-5569073
Defendant HugeNice



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

HONG KONG LEYUZHEN TECHNOLOGY
CO., LTD,

Plaintiff,

v.

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

Defendants.

Case No. 1:24-CV-03210-MMP

JUDGE MARTHA M. PACOLD

DECLARATION OF LIANGJIE LI
IN SUPPORT OF PLAINTIFF'S MOTION FOR ENTRY OF A PRELIMINARY
INJUNCTION

I, Liangjie Li, of Hong Kong, a special administrative region of the People's Republic of China, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff's Motion for Preliminary Injunction (the "Motion"). [Dkt. No. 29.]

3. I am the Chief Operations Officer for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

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

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

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

7. The defendants named in the company's copyright infringement enforcement actions are engaged in the practice of copying Plaintiff's copyright protected product images almost instantaneously after they are first displayed on the company's website and then associating these images with sale and promotion of unauthorized, counterfeit products of substandard quality, thereby deceiving consumers – including the citizens of the State of Illinois. Moreover, given the

nature of Plaintiff's goods, such large-scale sales operations over multiple online retail platforms require considerable supply chain coordination that could not reasonably be accomplished independently by any of the named Defendants.

8. The sophistication of Defendants' online, counterfeit sales network is further demonstrated by the skill with which they identify Schedule "A" plaintiffs, their allegedly infringed products or brands, and then immediately disseminating this information throughout their network by posting on online websites such as "SellerDefense.cn." The dissemination of this information then immediately results in the named Defendants siphoning off all illicit funds held in their online accounts.

9. Defendants have directly targeted their counterfeit sales activities, through online sales platforms not utilized by Plaintiff, in the United States, including to the residents of the State of Illinois, through, at least, fully interactive, e-commerce stores operating under their designated aliases on the Amazon platform.

10. Defendants in this action have continued to sell counterfeit Rotita brand products on Amazon.com. Plaintiff performed a cursory investigation for any additional counterfeit products being offered for sale on the Amazon.com platform by any of the Represented Defendants. Plaintiff's investigation revealed that, at least six (6) of the Represented Defendants were operating additional stores on Amazon.com that used, at least, misappropriated copyright protected images that infringe two (2) federally registered copyrights in connection with the sale of counterfeit Rotita brand products. These same defendants were also found to be displaying misappropriated, an additional six (6) unregistered copyrighted protected images on their Amazon.com online storefronts to advertise the sale of counterfeit Rotita products. Moreover, at least four (4) of the Represented Defendants are also named Defendants in Plaintiff's copyright

enforcement action involving the Amazon online sales platform that is pending before Judge Kennelly (Case No. 1:24-cv-0239). A preliminary injunction has been issued against these Defendants in that case. Attached as Exhibit "1" is a true and correct copy of a document summarizing the copyright registration numbers owned by Plaintiff, the copyright protected images, the link to Defendant's infringing image being used to sell counterfeit products on Amazon.com, and a picture of the unauthorized, copyright image being displayed on Defendants' online store fronts. Exhibit "1" also contains a list of the same information for the unregistered, copyright protected works owned by Plaintiff

11. Plaintiff has secured the services of two proprietary software programs capable of tracking the online sales activity for those offering identified products through Amazon and other related online platforms. This has resulted in nothing short of startling results. For instance, where a majority of the currently appearing Defendants have claimed zero infringing sales, Plaintiff's employment of the proprietary software products has revealed that Defendants have likely sold in far excess of \$10,000,000 in counterfeit Rotita brand products.

12. Plaintiff has provided its counsel with a copy of the search results for United States sales for each of the Defendants appearing through counsel in this case.

13. Plaintiff expects to earn a net profit of approximately 30% on the sale of its Rotita brand products. This figure, however, includes substantial advertising expenses that Defendants would not have to pay since they are largely capitalizing on Plaintiff's advertising efforts by misappropriating its copyright protected images and imbedding the term "Rotita" in their Amazon.com search engine optimization. Doing so causes their online stores to be displayed whenever someone searches for "Rotita" on Amazon.com despite Plaintiff not selling authentic "Rotita" brand products on the platform. Based on the foregoing, I would estimate that Defendants'

online stores operate at a net profit of between 40% to 50%. I believe that a disgorgement of Defendants' profits would fall within the net profit range.

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

Executed on June 13, 2024, in Hong Kong.









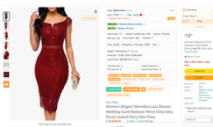

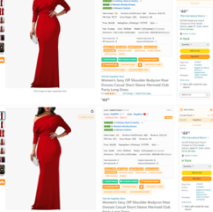

By: LIANGJIE LI
LIANGJIE LI





CERTIFICATE OF SERVICE

I hereby certify that on the 14th day of May 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email and by posting the filing on a URL contained on our website <https://blointernetenforcement.com/>, and distributed to ecommerce platform, Amazon.

By: /s/ Shawn A. Mangano
Shawn A. Mangano (Bar No. 6299408)
BAYRAMOGLU LAW OFFICES LLC
1540 West Warm Springs Road Ste. 100
Henderson, NV 89014
Tel: (702) 462-5973 Fax: (702) 553-3404
shawnmangano@bayramoglu-legal.com
Attorneys for Plaintiff

EXHIBIT 1

Seller	Client's Research	Copyright ed Photo	Registered Copyright	Link to Infringing Photo
MOJICK	 <p>Available for delivery June 19</p>		VA0002384827	https://www.amazon.com/dp/B0CJ4HZNPH?psc=1
MOJICK	 <p>Available for delivery June 18</p>		Protected Image	https://www.amazon.com/dp/B0C93627MM?psc=1
IbuduSexy	 <p>Available for delivery June 17</p>		Protected Image	https://www.amazon.com/dp/B0BVM2VJSC?psc=1
Bttup	 <p>Available for delivery June 18</p>		Protected Image	https://www.amazon.com/dp/B0C9SSVHQM?psc=1
Bttup	 <p>Available for delivery June 18</p>		VA0002379911	https://www.amazon.com/dp/B0BMZYDZPF?psc=1
HugeNice	 <p>Available for delivery June 17</p>		Protected Image	https://www.amazon.com/dp/B0BRR742XX?psc=1

<p>LaiyiVic A8W6GPHZ XI613</p>	 <p>Available for delivery June 17</p>		<p>Protected Image</p>	<p><a href="https://www.amazon.com/dp/B0BCNKCHMP?psc=<u>1</u>">https://www.amazon.com/dp/B0BCNKCHMP?psc=<u>1</u></p>
<p>SeNight A1VG2FFJ HUNFR9</p>	 <p>Available for delivery June 27- July 17</p>		<p>Protected Image</p>	<p><a href="https://www.amazon.com/dp/B0BPLST71M?psc=<u>1</u>">https://www.amazon.com/dp/B0BPLST71M?psc=<u>1</u></p>