

**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.:

**COMPLAINT FOR COPYRIGHT
INFRINGEMENT**

JURY TRIAL DEMANDED

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

NATURE OF THE ACTION

1. This action has been filed by Plaintiff to combat online copyright infringers who trade upon Plaintiff's reputation, goodwill and valuable copyrights consisting of images and 3-D artwork embodied in Plaintiff's Rotita brand product line (the "Asserted Brand") of women's apparel (the "Asserted Brand Copyrights"). Plaintiff publishes Asserted Brand Copyrights on an online storefront located at the company's website associated with its Asserted Brand. Defendants infringe the Asserted Brand Copyrights by publishing the copyrighted images and 3-D artwork on numerous fully interactive commercial Aliexpress internet stores ("Defendants' Online Stores") on the online Aliexpress platform identified on Schedule "A" (the "Online Platform"), and are

using, without authorization, the Asserted Brand Copyrights and derivates thereof, to sell and/or offer for sale “knock-off” products of inferior quality and at bargain basement prices.

2. Defendants likewise advertise, market, and/or sell their knockoff products embodying Plaintiff’s Asserted Brand Copyrights by reference to the same photographs and 3-D artwork as genuine Asserted Brand products, which causes further confusion and deception in the marketplace. Unique identifiers common to Defendants’ internet stores, such as design elements and similarities in Defendant’s unlawful use of the Asserted Brand Copyrights, establish a logical relationship between them and suggest that Defendants’ illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal counterfeiting operation.

3. Plaintiff is forced to file this action to combat Defendants’ counterfeiting of Plaintiff’s copyrights, as well as to protect unknowing consumers from purchasing knockoff products over the Internet. Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, and tarnishment of the Asserted Brand’s reputation and goodwill because of Defendants’ actions, and therefore seeks injunctive and monetary relief.

JURISDICTION AND VENUE

4. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Copyright Act, 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)–(b) and 28 U.S.C. § 1331.

5. This Court has jurisdiction over the unfair deceptive trade practices claim in this action that arise under the laws of the State of Illinois pursuant to 28 U.S.C. § 1367(a) because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

6. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants, since each of the Defendants directly targets consumers in the United States, including those within the State of Illinois, through at least

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

7. Specifically, Defendants are reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores through which residents can purchase inferior products that are advertised for sale using, without authorization, the Asserted Brand Copyrights. Each of the Defendants has targeted sales from Illinois residents by operating online stores that offer shipping to the United States, including to the State of Illinois, accept payment in United States currency, and, on information and belief, has used photographs and 3-D artwork protected by the Asserted Brand Copyrights to sell competing products of lesser quality to residents of the State of Illinois.

8. Each of the Defendants is committing tortious acts in the State of Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b)(2) and 1400(a) because Defendants have committed acts of copyright infringement in this judicial district, and do substantial business in the judicial district.

THE PARTIES

9. Plaintiff is a corporation organized under the laws of the People's Republic of China and is the owner of numerous federal copyright registrations issued by the United States Copyright Office that constitute the Asserted Brand Copyrights. Attached hereto as Exhibit 1 is a table summarizing true and correct eight (8) federal copyright registrations information regarding the Asserted Brand Copyrights.

10. Plaintiff founded the Rotita Brand in 2009, which is dedicated to women's fashion apparel and serves consumers in the United States and throughout the world.

11. Between 2021 and 2022, Plaintiff designed, caused to subsist in material form, and first published the original protected Asserted Brand Copyrights on its website located at the company's designated website employing the Asserted Brand in its URL and over the years has

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

12. Plaintiff has expended substantial time, money, and other resources in developing, advertising, and otherwise promoting its Asserted Brand and, specifically, the Asserted Brand Copyrights. As a result, the Asserted Brand is widely recognized and exclusively associated by consumers, the public, and the trade as being quality products.

13. Plaintiff owns all rights, including without limitation, the rights to reproduce the Asserted Brand Copyrights in copies, to prepare derivative works based upon the copyrighted works, and to distribute copies of the copyrighted works to the public by sale or other transfer of ownership, or by rental, lease, or lending, the protected works.

14. Plaintiff has neither licensed nor authorized Defendants to use the Asserted Brand Copyrights and none of the Defendants are authorized retailers of Plaintiff's genuine Asserted Brand products.

15. Upon information and belief, Defendants are individuals and business entities who, upon information and belief, reside mainly in the People's Republic of China or Hong Kong. Defendants conduct business throughout the United States, including within the State of Illinois and in this judicial district, through the operation of Defendants' Online Stores identified in Schedule "A", and has offered to sell and, on information and belief, has sold and continues to sell counterfeit Asserted Brand products to consumers within the United States, including in the State of Illinois and in this judicial district, utilizing, without authorization, the Asserted Brand Copyrights.

16. Defendants go to great lengths to conceal their identities and the full scope of their operations making it virtually impossible for Plaintiff to learn Defendants' true identities and the exact interworking of their network.

DEFENDANTS' UNLAWFUL CONDUCT

17. The success of Plaintiff's Asserted Brand has resulted in counterfeiting and intentional copying of the company's products, and the sale and offering for sale of said products through the unauthorized use of the Asserted Brand Copyrights. Upon information and belief, Defendants conduct their illegal operations through commercial, online stores on the Online Aliexpress Platform. Each Defendant targets consumers in the United States, including in the State of Illinois, and sells and offers for sale counterfeit products through the unauthorized use of photographs and 3-D artwork protected by Asserted Brand Copyrights.

18. In similar cases involving multiple counterfeiters, defendants operating internet stores intentionally conceal their identities and the full scope of their counterfeiting operations to deter plaintiffs and Courts from learning their true identities and the full extent of their illegal counterfeiting operations.

19. In this case, through the unauthorized use of the Asserted Brand Copyrights on Defendants' Online Stores, Defendants are directly and personally contributing to, inducing and engaging in the infringement of the Asserted Brand Copyrights as alleged, often times as partners, co-conspirators and/or suppliers. Upon information and belief, Defendants are an interrelated group of counterfeiters working in active concert to knowingly and willfully use without authorization the Asserted Brand Copyrights, to manufacture, import, distribute, offer for sale, and sell competing inferior products.

20. Upon information and belief, and at all times relevant hereto, Defendants have had full knowledge of Plaintiff's ownership of the Asserted Brand Copyrights including its exclusive right to use and license the Asserted Brand and the goodwill associated therewith.

21. Plaintiff has identified numerous stores on the Online Platform, including Defendants' Online Stores, which are offering for sale, selling, and importing knockoff products to consumers in this judicial district and throughout the United States by using, without authorization, the Asserted Brand Copyrights. Infringers on e-commerce platforms such as Defendants' Online Stores are estimated to receive tens of millions of visits per year and to

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

22. On information and belief, Defendants set up seller accounts on the Online Platform using, without authorization, the Asserted Brand Copyrights so that they appear to unknowing consumers to be authorized online retailers of genuine Asserted Brand products. Defendants' Online Stores accept payment in United States currency via credit cards and PayPal.

23. On information and belief, Defendants deceive unknowing consumers by using Plaintiff's Asserted Brand Copyrights on Defendants' Online Stores without authorization to attract customers, and to sell counterfeit products resembling Asserted Brand products.

24. Defendants, in similar type of counterfeit cases, deceive unknowing consumers by using the infringed intellectual property as originally used in connection with the sale of genuine products, within the content, text, and/or meta tags of their websites to attract various search engines crawling the Internet looking for websites relevant to consumer product searches. Additionally, counterfeiters in similar type cases, use other unauthorized search engine optimization ("SEO") tactics and social media spamming so that the Defendants internet store listings show up at or near the top of relevant search results and misdirect consumers searching for genuine products. Further, counterfeiters utilize similar illegitimate SEO tactics to propel new domain names to the top of search results after others are shut down.

25. Here, a search for the Asserted Brand women's dresses on the Online Platform resulted in the unauthorized display of the Asserted Brand Copyrights being used to promote competing, inferior products. As such, Plaintiff also seeks to disable Defendants' Online Stores that are the means by which the Defendants use, without authorization, the Asserted Brand

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

26. On information and belief, Defendants conceal their identities by using multiple fictitious names and addresses to register and operate a massive network of internet stores. It is common practice for counterfeiters to register accounts with incomplete information, randomly typed letters, or omitted cities or states; use privacy services that conceal the owners' identity and contact information; and regularly create new websites and online marketplace accounts on various platforms including Defendants' Online Stores listed in Schedule "A", which is attached hereto as Exhibit "2". Such internet store registration patterns are one of many common tactics counterfeiters use to conceal their identities, the full scope and interworking of their massive counterfeiting operation, and to avoid being shut down.

27. Upon receiving notice of a lawsuit, counterfeiters in similar cases will often register new domain names or online marketplace accounts under new aliases.¹ Counterfeiters also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border Protection. A 2021 U.S. Customs and Border Protection ("CBP") report on seizure statistics indicated that e-commerce sales accounted for 13.3% of total retail sales with second quarter of 2021 retail e-commerce sales estimated at \$222.5 billion.² In FY 2021, there were 213 million express mail shipments and 94 million international mail shipments. *Id.* Nearly 90 percent of all intellectual property seizures occur in the international mail and express environments. *Id.* at 27. The "overwhelming volume of small packages also makes CBP's ability to identify and interdict high risk packages difficult." *Id.* at 23.

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

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

28. Further, counterfeiters often operate multiple credit card merchant accounts and third-party accounts behind layers of payment gateways so that they can continue operating in spite of enforcement efforts. Upon information and belief, Defendants maintain off-shore bank accounts and regularly move funds from their Online Platform accounts to off-shore bank accounts outside the jurisdiction of this Court particularly since it is believed that Defendants reside in the People's Republic of China or Hong Kong.

29. Defendants' unlawful use of Plaintiff's Asserted Brand Copyrights to promote knockoff products for sale on Defendants' Online Stores, bear similarities and indicia of interrelatedness, suggesting they are manufactured by and come from a common source. Notable features common to Defendants' Online Stores include lack of contact information, same or similar products for sale, identically or similarly priced items and sales discounts, shared hosting service, similar name servers, and their common infringement of Plaintiff's Asserted Brand Copyrights.

30. Defendants' use of Plaintiff's Asserted Brand Copyrights in connection with the advertising, marketing, distribution, offering for sale and the sale of competing products of inferior quality is likely to cause and has caused confusion, mistake and deception by and among consumers and is irreparably harming the Asserted Brand. Defendants have manufactured, imported, distributed, offered for sale and sold their inferior products using the Asserted Brand Copyrights and will continue to do so.

31. Defendants, without authorization or license from Plaintiff, knowingly and willfully used and continue to use the Asserted Brand Copyrights in connection with the advertisement, offer for sale and the sale of counterfeit or knockoff Asserted Brand products through, *inter alia*, their Online Stores identified in Schedule "A".

32. Upon information and belief, Defendants will continue to infringe the Asserted Brand Copyrights for the purpose of selling inferior knockoff products unless preliminarily and permanently enjoined.

33. Defendants' unauthorized use of the Asserted Brand Copyrights in connection with the advertising, distribution, offering for sale, and the sale of poor-quality products in the United

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

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

COUNT I

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

[Against Defendants Designated in Schedule A]

35. Plaintiff repeats, realleges and incorporates by reference herein its allegations contained in paragraphs 1 through 34, above.

36. Plaintiff's Asserted Brand Copyrights have significant value and have been produced and created at considerable expense.

37. Plaintiff owns all exclusive rights, including without limitation the rights to reproduce the Asserted Brand Copyrights in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public by sale or other transfer of ownership, or by rental, lease, or lending, the copyright protected works.

38. Defendants have sold, offered to sell, marketed, distributed, and advertised, and are still selling, offering to sell, marketing, distributing, and advertising products using the Asserted Brand Copyrights without Plaintiff's permission.

39. Upon information and belief, Defendants have directly copied the Asserted Brand Copyrights to advertise, promote, offer for sale, and sell competing products of low quality and at a fraction of the price.

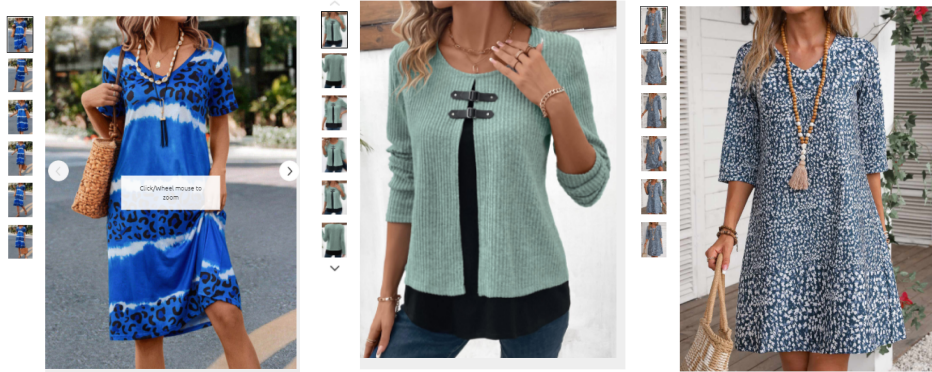
40. As examples, Defendants deceive unknowing consumers by using, without authorization, the Asserted Brand Copyrights on Defendants' Online Stores to attract customers as follows:

Exemplary of Counterfeit Products sold on Defendants' Online Aliexpress Stores



compared to

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



41. Defendants' unauthorized exploitation of Asserted Brand Copyrights to advertise, offer for sale and sell inferior products on Defendants' Online Stores constitutes copyright infringement.

42. On information and belief, Defendants' infringing acts were willful, deliberate, and committed with prior notice and knowledge of the Asserted Brand Copyrights.

43. Each Defendant either knew, or should have reasonably known, that the Asserted Brand Copyrights are copyright protected, and that their unauthorized display and use of the representations infringed on the Asserted Brand Copyrights. Further, each Defendant continues to infringe upon Plaintiff's rights in and to the Asserted Brand Copyrights.

44. As a direct and proximate result of their unauthorized and infringing conduct, Defendants have obtained and continue to realize direct and indirect profits and other benefits rightfully belonging to Plaintiff, and that Defendants would not otherwise have realized but for their infringement of Plaintiff's Asserted Brand Copyrights.

45. The foregoing acts of infringement constitute a collective enterprise of shared, overlapping facts and have been willful, intentional, and in disregard of and with indifference to the rights of the Plaintiff.

46. Accordingly, Plaintiff seek an award of damages pursuant to 17 U.S.C. § 504.

47. In addition to actual damages, Plaintiff is entitled to receive the profits made by Defendants from their wrongful acts, pursuant to 17 U.S.C. § 504(b). Each Defendant should be required to account for all gains, profits, and advantages derived by each Defendant from their acts of infringement.

48. In the alternative, Plaintiff is entitled to, and may elect to choose statutory damages pursuant to 17 U.S.C. § 504(c), which should be enhanced by 17 U.S.C. § 504(c)(2) because of Defendants' willful copyright infringement.

49. Plaintiff is entitled to, and may elect to choose injunctive relief under 17 U.S.C. § 502, enjoining any use or exploitation by Defendants of their infringing work and for an order under 17 U.S.C. § 503 that any of Defendants' infringing products be impounded and destroyed.

50. Plaintiff seeks and is also entitled to recover reasonable attorneys' fees and costs of suit pursuant to 17 U.S.C. § 505.

51. Plaintiff has no adequate remedy at law, and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to the reputation and goodwill of their well-known Asserted Brand.

52. The conduct of each Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured monetarily. As such, Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. §§502 and 503, Plaintiff is entitled to injunctive relief prohibiting each Defendant from further infringing the

Asserted Brand Copyrights and ordering that each Defendant destroy all unauthorized copies. Defendants' copies, plates, and other embodiments of the copyrighted works from which copies can be reproduced, if any, should be impounded and forfeited to Plaintiff as instruments of infringement, and all infringing copies created by Defendants should be impounded and forfeited to Plaintiff, under 17 U.S.C §503.

COUNT II

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

[Against Defendants Designated in Schedule A]

53. Plaintiff repeats, realleges and incorporates by reference herein its allegations contained in paragraphs 1 through 34, above.

54. Defendants' use of material protected by Plaintiff's Asserted Copyrights for the promotion, marketing, offering for sale, and the sale of knockoff Asserted Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to false affiliation, connection, or association with Plaintiff's Asserted Brand or the false origin, sponsorship, or approval of Defendants' inferior products under Plaintiff's Asserted Brand.

55. By using Plaintiff's Asserted Brand Copyrights in connection with Defendants' sale of knockoff products, Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of Defendants' inferior quality products.

56. Defendants' conduct constitutes willful false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of its knockoff products to the general public under 15 U.S.C. §§ 1114, 1125.

57. Plaintiff has no adequate remedy at law, and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to the company's reputation and the goodwill of the Asserted Brand.

COUNT III
VIOLATION OF ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES ACT
(815 ILCS § 510/1, et seq.)
[Against Defendants Designated in Schedule A]

58. Plaintiff repeats, realleges and incorporates by reference herein its allegations contained in paragraphs 1 through 34, above.

59. Defendants have engaged in acts violating Illinois law including, but not limited to, passing off their knockoff products as those of Plaintiff's Asserted Brand products through the unauthorized use of the Asserted Brand Copyrights, thereby causing a likelihood of confusion and/or misunderstanding as to the source of their goods, causing a likelihood of confusion and/or misunderstanding as to an affiliation, connection, or association with genuine Asserted Brand products, falsely representing that their products have Plaintiff's approval when they do not, and engaging in other conduct which creates a likelihood of confusion or misunderstanding among the public.

60. The foregoing acts of Defendants constitute a willful violation of the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510/1, et seq.

61. Plaintiff has no adequate remedy at law, and Defendants' conduct has caused Plaintiff to suffer damage to its Asserted Brand's reputation and goodwill. Unless enjoined by the Court, Plaintiff will continue to suffer future irreparable harm as a direct result of Defendants' unlawful activities.

PRAYER FOR RELIEF

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

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

a. using Plaintiff's Asserted Brand Copyrights or any reproductions, counterfeit copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Asserted Brand product or is not authorized by Plaintiff to be sold in connection with its registered copyrights;

b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Asserted Brand product or any other product produced by Plaintiff by using the Asserted Brand Copyrights to sell and offer for sale such products that are not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff;

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

d. further infringing the Asserted Brand Copyrights and damaging Plaintiff's Asserted Brand's reputation and goodwill;

e. otherwise competing unfairly with Plaintiff through the unauthorized use of the Asserted Brand Copyrights in any manner;

f. shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory sold or offered for sale through the unauthorized use of the Asserted Brand Copyrights;

g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendants' stores on Defendants' Online Stores or the Online Platform, or any other domain name or online marketplace account that is being used to sell or is the means by which Defendants could continue to sell knockoff Asserted Brand products through the unauthorized use of the Asserted Brand Copyrights; and

h. operating and/or hosting websites at the Defendants' Internet stores and any other domain names registered or operated by Defendants that are involved with the distribution,

marketing, advertising, offering for sale, or sale of any product through the unauthorized use of the Asserted Brand Copyrights.

2. That Defendants, within fourteen (14) days after service of judgment with notice of entry thereof upon them, be required to file with the Court and serve upon Plaintiff a written report under oath setting forth in detail the manner and form in which Defendants have complied with paragraph 1 above;

3. Entry of an Order that, upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including AliExpress, Walmart, Amazon, DHgate, eBay, Temu, and Wish, social media platforms such as Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendants' Online Stores, and domain name registrars, shall:

a. disable and cease providing services for any accounts through which Defendants engage in the sale of knockoff Asserted Brand products by using, without authorization, the Asserted Brand Copyrights, including any accounts associated with the Defendants listed on Schedule "A";

b. disable and cease displaying any advertisements used by or associated with Defendants that display the Asserted Brand Copyrights; and

c. take all necessary steps to prevent links to Defendants' Online Stores identified on Schedule "A" from displaying in search results, including, but not limited to, removing links to Defendants' domain names from any search index.

4. That Defendants account for and pay to Plaintiff all profits realized by them through the unauthorized use of the Asserted Brand Copyrights.

5. In the alternative, that Plaintiff be awarded statutory damages of not less than \$750 and not more than \$30,000 for each and every infringement of the Asserted Brand Copyrights pursuant to 17 U.S.C. § 504(c), which should be enhanced to a sum of not more than \$150,000 by 17 U.S.C. § 504(c)(2) because of Defendants' willful copyright infringement;

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

DEMAND FOR JURY TRIAL

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

Dated: August 26, 2024

Respectfully Submitted

By: /s/ Shawn A. Mangano
Shawn A. Mangano (IL No. 6299408)
Nihat Deniz Bayramoglu (NV Bar No. 14030)
Gokalp Bayramoglu (NV Bar No. 15500)
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EXHIBIT 1

Copyright Registration Number	Image Associated with Number
Va0002379881 1-13195130423	
Va0002379895 1-13195071494	
Va0002379899 1-13195071590	
Va0002379911 1-13195130451	
Va0002379904 1-13195130345	
Va0002379934 1-13317532199	
Va0002379907 1-13195130257	
VA0002379930 1-13317532121	

Registration Number / Date VA0002379881 / 2023-11-12

Type of Work Visual Material

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

Application Title Rotita10-2019

Date of Creation 2019

Copyright Claimant

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

Authorship on Application

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

Rights and Permissions

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

Description

- 302 photographs :
- Electronic file (eService)

Copyright Note

C.O. correspondence.

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

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

Nation of First Publication

United States

Publication Date Range

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

Names

- [HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED](#)

Registration Number / Date VA0002379895 / 2023-11-12

Type of Work Visual Material

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

Application Title Rotita5-2021

Date of Creation 2021

Copyright Claimant

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

Authorship on Application

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

Rights and Permissions

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

Description

- 337 photographs :
- Electronic file (eService)

Copyright Note

C.O. correspondence.

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

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

Nation of First Publication

United States

Publication Date Range

- 2021-01-19 to
- 2021-12-30

Names

- [HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED](#)

Registration Number / Date VA0002379899 / 2023-11-12

Type of Work Visual Material

Title Rotita7-2023.[Group registration of published photographs.534 photographs. 2023-07-28 to 2023-11-08]

Application Title Rotita7-2023

Date of Creation 2023

Copyright Claimant

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

Authorship on Application

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

Rights and Permissions

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

Description

- 534 photographs :
- Electronic file (eService)

Copyright Note

C.O. correspondence.

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

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

Nation of First Publication

United States

Publication Date Range

- 2023-07-28 to
- 2023-11-08

Names

- [HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED](#)

Registration Number / Date VA0002379911 / 2023-11-12

Type of Work Visual Material

Title Rotita11-2020.[Group registration of published photographs.299 photographs. 2020-01-02 to 2020-12-31]

Application Title Rotita11-2020

Date of Creation 2020

Copyright Claimant

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

Authorship on Application

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

Rights and Permissions

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

Description

- 299 photographs :
- Electronic file (eService)

Copyright Note

C.O. correspondence.

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

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

Nation of First Publication

United States

Publication Date Range

- 2020-01-02 to
- 2020-12-31

Names

- [HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED](#)

Registration Number / Date VA0002379904 / 2023-11-12

Type of Work Visual Material

Title Rotita9-2018.[Group registration of published photographs.352 photographs. 2018-01-04 to 2018-12-18]

Application Title Rotita9-2018

Date of Creation 2018

Copyright Claimant

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

Authorship on Application

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

Rights and Permissions

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

Description

- 352 photographs :
- Electronic file (eService)

Copyright Note

C.O. correspondence.

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

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

Nation of First Publication

United States

Publication Date Range

- 2018-01-04 to
- 2018-12-18

Names

- [HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED](#)

Registration Number / Date VA0002379907 / 2023-11-12

Type of Work Visual Material

Title Rotita8-2023.[Group registration of published photographs.568 photographs. 2023-01-04 to 2023-08-22]

Application Title Rotita8-2023

Date of Creation 2023

Copyright Claimant

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

Authorship on Application

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

Rights and Permissions

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

Description

- 568 photographs :
- Electronic file (eService)

Copyright Note

C.O. correspondence.

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

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

Nation of First Publication

United States

Publication Date Range

- 2023-01-04 to
- 2023-08-22

Names

- [HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED](#)

Registration Number / Date VA0002379930 / 2023-12-20

Type of Work Visual Material

Title Rotita25-2023.[Group registration of published photographs.746 photographs. 2023-01-05 to 2023-09-20]

Application Title Rotita25-2023

Date of Creation 2023

Copyright Claimant

- HONGKONG 卓悅 EYUZHEN 卓悅 TECHNOLOGY 有限公司, LIMITED. Address: FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., HONGKONG.

Authorship on Application

- HONGKONG 卓悅 EYUZHEN 卓悅 TECHNOLOGY 有限公司, LIMITED, Domicile: Hong Kong; employer for hire; Citizenship: Hong Kong. Authorship: photographs.

Description

- 746 photographs :
- Electronic file (eService)

Copyright Note

C.O. correspondence.

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

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

Nation of First Publication

United States

Publication Date Range

- 2023-01-05 to
- 2023-09-20

Names

- [卓悅 EYUZHEN 卓悅 TECHNOLOGY 有限公司](#)

EXHIBIT 2

Schedule A

Defendant No.	Seller's Name	Link to Seller's Page
1	A-GEOJIEER Store	https://www.aliexpress.com/store/1101727029?spm=a2g0o.detail.0.0.488fKgbnKgbnSO
2	Atalia Dropshipping Store	https://www.aliexpress.com/store/1101810601?spm=a2g0o.detail.0.0.36374f36z9KFfO
3	Barbi Women Store	https://www.aliexpress.com/store/1102008555?spm=a2g0o.detail.0.0.23ebxS00xS00Cz
4	Beautiful baby-Store	https://www.aliexpress.com/store/1101793896?spm=a2g0o.detail.0.0.68163591R0XSOf
5	Bing Manson Store	https://www.aliexpress.com/store/1102247537?spm=a2g0o.detail.0.0.55786354d64HeD
6	BOQU Store Houma Jifangyuan Trading Co., Ltd.	https://www.aliexpress.com/store/1101232026?spm=a2g0o.detail.0.0.4487xeRhxeRhpA
7	Boutique Women Clothing	https://www.aliexpress.com/store/1102764145?spm=a2g0o.detail.0.0.4e96LdhOLdhOrk
8	Caiyi Store	https://www.aliexpress.com/store/1101797889?spm=a2g0o.detail.0.0.494fHQarHQarOC
9	Casual & Comfortable Clothes Store	https://www.aliexpress.com/store/1101367105?spm=a2g0o.detail.0.0.159eM7T0M7T0Nd
10	CHIC Store	https://www.aliexpress.com/store/1101359417?spm=a2g0o.detail.0.0.9d8fp1gXp1gXUT
11	CIKINI Official Store	https://www.aliexpress.com/store/1100833964?spm=a2g0o.detail.0.0.3ddb2d5fTZ8z76
12	Clothes Life Store Store	https://www.aliexpress.com/store/1101831949?spm=a2g0o.detail.0.0.a71617344JQqBB
13	Colongsou Dthyo Store	https://www.aliexpress.com/store/1102154135?spm=a2g0o.detail.0.0.2dc9Z2HfZ2HfcQ
14	Fall In Love With You Clothes Store	https://www.aliexpress.com/store/1103079606?spm=a2g0o.detail.0.0.5f02WKvhWKvhLN&sortType=bestmatch_sort
15	Fashion Women Clothing	https://www.aliexpress.com/store/1101830142?spm=a2g0o.detail.0.0.3ab83f71Piosno
16	Fat Large Size Swimsuit Store	https://www.aliexpress.com/store/1101604842?spm=a2g0o.detail.0.0.320071ddS0Y7yU
17	Fazhifan Fashion Women's Wear Store	https://www.aliexpress.com/store/1103051184?spm=a2g0o.store_pc_home.pcShopHead_2006483789284.0
18	GG BOND Store	https://www.aliexpress.com/store/1103054206?spm=a2g0o.detail.0.0.47c54JTC4JTCpQ
19	Girl Showing Store	https://www.aliexpress.com/store/1102409547?spm=a2g0o.detail.0.0.1ae80Fnk0Fnk04

Schedule A

20	Goumu Store	https://www.aliexpress.com/store/1101265565?spm=a2g0o.store_pc_home.pcShopHead_7661485.0
21	IDolly's Bag Store	https://www.aliexpress.com/store/1101343921?spm=a2g0o.detail.0.0.46496ca8HQinys
22	Infashion Items Store	https://www.aliexpress.com/store/1101096726?spm=a2g0o.detail.0.0.557dTOLWTOLWZz
23	integrity big's store	https://www.aliexpress.com/store/1102552405?spm=a2g0o.detail.0.0.4a46vFFEvFFeIV&sortType=bestmatch_sort
24	IOWBFNYS Customize Dropship to Abroad Store	https://www.aliexpress.com/store/1101659462?spm=a2g0o.detail.0.0.6d6ciTwBiTwBXt
25	Large Size Swimsiut Store	https://www.aliexpress.com/store/1101343201?spm=a2g0o.detail.0.0.a2e2mXAAmXAAzt
26	LGAH Store	https://www.aliexpress.com/store/1102699149?spm=a2g0o.detail.0.0.2546ffc2FkpLmb
27	LIH HUA Official Store	https://www.aliexpress.com/store/1102526343?spm=a2g0o.detail.0.0.5bd4iP8qiP8qLK&sortType=bestmatch_sort
28	Lipswag Styles Store	https://www.aliexpress.com/store/1101312836?spm=a2g0o.detail.0.0.1b4bh4bxh4bxxu
29	Lulu Clothing Store	https://www.aliexpress.com/store/1102754895?spm=a2g0o.detail.0.0.aec43325UTsmtA
30	Mi You Pin Store	https://www.aliexpress.com/store/1102743269?spm=a2g0o.detail.0.0.7016410cRMnAsf
31	Mygirl Newdv Store	https://www.aliexpress.com/store/1101607924?spm=a2g0o.detail.0.0.6a0446397V0teu
32	NIUBI Animal Store	https://www.aliexpress.com/store/1101859790?spm=a2g0o.detail.0.0.541f1d05KkOKim
33	Oufisun 53 Store	https://www.aliexpress.com/store/1102991003?spm=a2g0o.detail.0.0.4ffaUn0KUn0K60
34	Plus Size Men T-Shirt Store	https://www.aliexpress.com/store/1101387901?spm=a2g0o.detail.0.0.326em4zZm4zZRY
35	Quanly Store	https://www.aliexpress.com/store/1101942175?spm=a2g0o.detail.0.0.3c08tDMktDMkBz
36	R Y 30 Store	https://www.aliexpress.com/store/1102351344?spm=a2g0o.detail.0.0.163fcS5vcS5vsl
37	RECLOTHINGL Store	https://www.aliexpress.com/store/1102377353?spm=a2g0o.detail.0.0.31334cc30jNtk
38	Reda-mancy Store	https://www.aliexpress.com/store/1102197006?spm=a2g0o.detail.0.0.7f868adK8adKx8
39	Sell Everything Dropshipping Store	https://www.aliexpress.com/store/1101348877?spm=a2g0o.detail.0.0.410f772aQFh5XZ
40	SEniee Store	https://www.aliexpress.com/store/1102842290?spm=a2g0o.detail.0.0.7c57flwZflwZzZ

Schedule A

41	Shining Jewelry Clothes Store Store	https://www.aliexpress.com/store/1102936690?spm=a2g0o.detail.0.0.84f16TYn6TYnh5
42	Shop1100065002 Store	https://www.aliexpress.com/store/1101983928?spm=a2g0o.detail.0.0.4afb77uB77uBH2
43	Shop1102695911 Store	https://www.aliexpress.com/store/1102694896?spm=a2g0o.detail.0.0.3815RANURANUeL
44	Shop1102723317 Store	https://www.aliexpress.com/store/1102726273?spm=a2g0o.detail.0.0.452e5136wquRhy
45	Shop1102888276 Store	https://www.aliexpress.com/store/1102891264?spm=a2g0o.detail.0.0.3e6dRu9rRu9rII
46	Shop1102959698 Store	https://www.aliexpress.com/store/1102977488?spm=a2g0o.detail.0.0.f186y0fby0fb5s
47	Shop1103014677 Store	https://www.aliexpress.com/store/1103014678?spm=a2g0o.detail.0.0.286347eduWc1Cc
48	Shop1103128934 Store	https://www.aliexpress.com/store/1103151484?spm=a2g0o.detail.0.0.2a0eOVc0OVc09f
49	Shop1103275282 Store	https://www.aliexpress.com/store/1103271308?spm=a2g0o.detail.0.0.17152q5D2q5Dxq
50	Shop1103312877 Store	https://www.aliexpress.com/store/1103317823?spm=a2g0o.detail.0.0.134775e7XuUlk7
51	Shop5246287 Store	https://www.aliexpress.com/store/1101350260?spm=a2g0o.detail.0.0.36714366EKXxFW
52	Shop5248109 Store	https://www.aliexpress.com/store/1101350775?spm=a2g0o.detail.0.0.89b9r7rur7ruWq
53	Shop5830172 Store	https://www.aliexpress.com/store/1101489585?spm=a2g0o.detail.0.0.361fs4rms4rm8R
54	Shop5879142 Store	https://www.aliexpress.com/store/1101402006?spm=a2g0o.detail.0.0.5cfa4b95NSxsmK
55	Shop900235296 Store	https://www.aliexpress.com/store/1101494294?spm=a2g0o.detail.0.0.1e4814f5JZD1EH
56	Shop911259384 Store	https://www.aliexpress.com/store/1101594906?spm=a2g0o.detail.0.0.63d2eaf1ItGMKy
57	Shop999999 Store Store	https://www.aliexpress.com/store/1103258171?spm=a2g0o.detail.0.0.5655IvdZlvdZ1p
58	SUB 5243272 Store	https://www.aliexpress.com/store/1101349520?spm=a2g0o.detail.0.0.236e64ee13muG6
59	SupBora Official Store	https://www.aliexpress.com/store/1101246426?spm=a2g0o.detail.0.0.626f2dbdEHZwkJ
60	SUWA Chicci Store	https://www.aliexpress.com/store/1101414381?spm=a2g0o.detail.0.0.30bb25391QxHQq
61	SYJ Beautiful Clothes Store	https://www.aliexpress.com/store/1101857463?spm=a2g0o.detail.0.0.17d00I070I07XB
62	Telaura Beachwear Store	https://www.aliexpress.com/store/1101028666?spm=a2g0o.detail.0.0.4bb312b4Y9FRo5

Schedule A

63	TES Fashion Store	https://www.aliexpress.com/store/1102794032?spm=a2g0o.detail.0.0.21a411fk11fk2a&sortType=bestmatch_sort
64	T-Show	https://www.aliexpress.com/store/1100877435?spm=a2g0o.detail.0.0.1df4757c5TIyh1
65	Urban Outfit Store	https://www.aliexpress.com/store/1102991845?spm=a2g0o.detail.0.0.676e71abtnPZbs
66	wbj_Fahison Store	https://www.aliexpress.com/store/1101947692?spm=a2g0o.detail.0.0.afa95af4oGrKMe
67	Xinxu Official Store	https://www.aliexpress.com/store/1102019148?spm=a2g0o.detail.0.0.4b3d571bntJ0qz
68	Yan Qun Store	https://www.aliexpress.com/store/1102648710?spm=a2g0o.detail.0.0.ec8177d9tFynPy
69	YY Fashion Store	https://www.aliexpress.com/store/1101351554?spm=a2g0o.detail.0.0.4b464f2c12zHc2
70	Zaran Store	https://www.aliexpress.com/store/1101690273?spm=a2g0o.detail.0.0.56c57e2y7e2yPq
71	ZESTY International Store	https://www.aliexpress.com/store/1102756062?spm=a2g0o.detail.0.0.3fd0Qh5oQh5oxe
72	ZJFZML ZZ Store	https://www.aliexpress.com/store/1101351035?spm=a2g0o.detail.0.0.6db36cad6BsE1k
73	Ivey Store	https://www.aliexpress.com/store/1102160301?spm=a2g0o.detail.0.0.567eIwGIIwGlc6
74	Little-Fish Store	https://www.aliexpress.com/store/1101528699?spm=a2g0o.detail.0.0.2849RYsbRYsbwq
75	ODFVEBX Store	https://www.aliexpress.com/store/1101553736?spm=a2g0o.detail.0.0.5a2b0XXu0XXukw