# 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-07702-LCJ-SMF

Honorable Judge Lindsay C. Jenkins

#### TEMPORARY RESTRAINING ORDER

Plaintiff Hong Kong Leyuzhen Technology Co. Limited, ("PLAINTIFF") filed an *Ex Parte* Motion for Entry of a Temporary Restraining Order and Other Relief (the "Motion") against the fully interactive, e-commerce stores <sup>1</sup> operating under the domain names identified in Schedule A to the Complaint and attached hereto (collectively, "Defendants") and using at least the online marketplace accounts identified in Schedule A (the "Online Marketplaces"). After reviewing the Motion and the accompanying record, this Court GRANTS PLAINTIFF's Motion as follows:

The Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendants because Defendants directly target their business activities toward consumers in the United States, including consumers in the State of Illinois. Specifically, PLAINTIFF has provided a basis to conclude that Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more seller aliases, offer shipping to the United States, including to the State of Illinois, and have sold knockoff products

 $<sup>^{\</sup>mathrm{1}}$  The e-commerce store URLs are listed on Schedule A hereto under the Online Marketplaces.

through the unauthorized use and display of PLAINTIFF's federally registered copyrights (the "Plaintiff's Copyrights") to residents of the State of Illinois. (Docket No. 1-1, Exhibit 1 to the Complaint, which includes the federally registered copyrights associated with the Plaintiff's Copyrights and attached hereto).

In this case, PLAINTIFF has presented screenshot evidence that each Defendant's e-commerce store on Aliexpress.com is reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores that display, without authorization, the Plaintiff's Copyrights through which Illinois residents can and do purchase knockoff Plaintiff's, Rotita Brand products. *See* Docket No. [5-8] Exhibit 7 to the Declaration of Shawn A. Mangano in support of Temporary Restraining Order, which includes screenshot evidence and internet link confirming that each Defendant's Internet store displays the Plaintiff's Copyrights without authorization in offering knockoff Plaintiff's products and they stand ready, willing, and able to ship its knockoff goods to customers in Illinois. Accordingly, the Court finds that PLAINTIFF stands a likelihood of success on the merits of its copyright infringement, false designation of origin, and state law deceptive trade practices claims for relief.

The Court additionally finds that issuance of the requested injunctive relief would be in the public interest by protecting consumers from being misled by the unauthorized display of the Plaintiff's Copyrights by Defendants on their Internet stores in enticing the purchase of knockoff Plaintiff's products that are of inferior quality. The Court also finds that it need not balance the interests of Defendants in this case because there is credible evidence to conclude they are engaged in, among other things, willful copyright infringement of the Plaintiff's Copyrights.

The Court also finds that issuing this Order without notice pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure is appropriate because PLAINTIFF has presented specific facts in the Declaration of Shawn A. Mangano in support of the Motion and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. Specifically, in the absence of an *ex parte* Order,

Defendants could and likely would move any assets from accounts in financial institutions under this Court's jurisdiction to offshore accounts. Accordingly, this Court Orders as follows:

- 1. Defendants, their officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be temporarily enjoined and restrained from:
  - a. Using or displaying the Plaintiff's Copyrights, in any medium, whether it be print, digital or otherwise, in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Plaintiff's product or is not authorized by PLAINTIFF to be sold in connection with the Plaintiff's Copyrights;
  - passing off, inducing, or enabling others to sell or pass off any product as a genuine Plaintiff's product or any other product produced by PLAINTIFF through the use or display of the Plaintiff's Copyrights;
  - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control, or supervision of PLAINTIFF, or are sponsored by, approved by, or otherwise connected with PLAINTIFF;
  - d. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for PLAINTIFF, nor authorized by PLAINTIFF to be sold or offered for sale through the use or display of the Plaintiff's Copyrights; and
  - e. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.

- 2. PLAINTIFF is authorized to issue expedited written discovery to Defendants, pursuant to Federal Rules of Civil Procedure 33, 34, 36, and 45 related to:
  - a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and
  - c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, Temu.com, PayPal Inc. ("PayPal"), Alipay, ContextLogic Inc. d/b/a Wish.com ("Wish.com"), Alibaba Group Holding Ltd. ("Alibaba"), Ant Financial Services Group ("Ant Financial"), Amazon Pay, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
  - d. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, and the domain name registrars, including, but not limited to, GoDaddy Operating Company LLC, Name.com, PDR LTD. d/b/a/PublicDomainRegistry.com, Cloudflare Inc, Oracle Corp., Amazon Inc., Alibaba Group d/b/a Alibaba Cloud.com, Namesilo, LLC d/b/a privacuguardian.org, and Namecheap Inc., within seven (7) calendar days of receipt of this Order or prior to

- the expiration of this Order, whichever date shall occur first, shall disable the Defendant Domain Names and make them inactive and untransferable until further order by this Court.
- 3. Upon PLAINTIFF's request, any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of Defendants' Online Marketplaces, including, without limitation, any online marketplace platforms such as Temu, eBay Inc., AliExpress, Alibaba, Amazon.com Inc., Wish.com, and Dhgate (collectively the "Third Party Providers"), shall, within seven (7) calendar days after receipt of such notice, provide to PLAINTIFF expedited discovery, limited to copies of documents and records in such person's or entity's possession or control sufficient to determine:
  - a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and
  - c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Alipay, Wish.com, Alibaba, Ant Financial, Amazon Pay, or other merchant account providers, payment providers, third party processors, credit card associations (e.g., MasterCard and VISA), including present balances on any accounts.

- 4. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, and the domain name registrars, including, but not limited to, GoDaddy Operating Company LLC, Name.com, PDR LTD. d/b/a PublicDomainRegistry.com, Cloudflare Inc, Oracle Corp., Amazon Inc., Alibaba Group d/b/a Alibaba Cloud.com, Namesilo, LLC d/b/a privacuguardian.org, and Namecheap Inc., within seven (7) calendar days of receipt of this Order or prior to the expiration of this Order, whichever date shall occur first, shall disable the Defendant
- 5. Upon PLAINTIFF's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 3, shall within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Plaintiff's Copyrights.
- 6. Any Third-Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:
  - a. locate all accounts and funds connected to Defendants' seller aliases, including, but
    not limited to, any financial accounts connected to the information listed in
    Schedule A hereto, and any e-mail addresses provided for Defendants by third parties;
    and
  - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further order by this Court.
- 7. PLAINTIFF may provide notice of the proceedings in this case to Defendants, including notice of the preliminary injunction hearing, service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order, and other relevant documents on a website and by sending an e-mail to any e-mail addresses provided for Defendants by third parties. The Clerk of the Court is directed to issue a single original summons in the name of "THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED

IN SCHEDULE A HERETO" that shall apply to all Defendants. The combination of providing

notice via electronic publication and e-mail, along with any notice that Defendants receive from

payment processors, shall constitute notice reasonably calculated under all circumstances to apprise

Defendants of the pendency of the action and afford them the opportunity to present their objections.

8. PLAINTIFF must provide notice to Defendants of any motion for preliminary

injunction as required by Rule 65(a)(1).

9. Within seven (7) court days of entry of this Order, PLAINTIFF shall deposit with the

Court \$10,000.00, either cash, cashier's check or surety bond, as security, which amount has, in

the absence of adversarial testing, been deemed adequate for the payment of such damages as any

person may be entitled to recover as a result of a wrongful restraint hereunder.

10. Any Defendants that are subject to this Order may appear and move to dissolve or

modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and

the Northern District of Illinois Local Rules. Any third party impacted by this Order may move for

appropriate relief.

This Temporary Restraining Order without notice is entered at 9:00 A.M. on this 29<sup>th</sup> day of

August 2024 and shall remain in effect for fourteen (14) calendar days. Any motion to extend this

Order must be filed by September 12, 2024.

Enter: 24-cv-7702

Lindsay C. Jenkins

United States District Judge

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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@bayramoglulegal.com

#### Description

- o 302 photographs:
- Electronic file (eService)

#### **Copyright Note**

C.O. correspondence.

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

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

#### Nation of First Publication

**United States** 

#### **Publication Date Range**

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

#### Names

# **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@bayramoglulegal.com

#### Description

- o 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**

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

#### Names

# **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@bayramoglulegal.com

#### Description

- o 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**

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

#### Names

# **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@bayramoglulegal.com

#### Description

- o 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**

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

#### Names

# **Registration Number / Date** VA0002379934 / 2023-12-20

## **Type of Work** Visual Material

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

Application Title Rotita26-2023

Date of Creation 2023

## **Copyright Claimant**

HONGKONG쟊EYUZHEN쟕ECHNOLOGY잺O.,LIMITED. Address:
FLAT/RM잸,9/F쟔ILVERCORP쟅NTERNATIONAL쟕OWER,707713쟍ATHAN쟓OAD,쟋ONGKOK,KOWLOON,쟄ONGKONG., HONGKONG, Hong
Kong.

# **Authorship on Application**

o HONGKONG쟊EYUZHEN쟕ECHNOLOGY잺O.,LIMITED, Domicile: Hong Kong; employer for hire; Citizenship: Hong Kong. Authorship: photographs.

#### Description

- o 744 photographs:
- Electronic file (eService)

## **Copyright Note**

C.O. correspondence.

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

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

#### **Nation of First Publication**

**United States** 

#### Publication Date Range

- o 2023-01-02 to
- o 2023-07-20

#### Names

# **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@bayramoglulegal.com

#### Description

- o 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**

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

#### Names

# **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@bayramoglulegal.com

#### Description

- o 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**

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

#### Names

# **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** 

HONGKONG쟊EYUZHEN쟕ECHNOLOGY잺O.,LIMITED. Address:
 FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,7
 07 713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKO
 NG., HONGKONG.

## **Authorship on Application**

o HONGKONG쟊EYUZHEN쟕ECHNOLOGY잺O.,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**

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

#### Names

Defendant No.	Seller's Name	Link to Seller's Page
1	A-GEOJIEER Store	https://www.aliexpress.com/store/1101727029?s pm=a2g0o.detail.0.0.488fKgbnKgbnSO
2	Atalia Dropshipping Store	https://www.aliexpress.com/store/1101810601?s pm=a2g0o.detail.0.0.36374f36z9KFfO
3	Barbi Women Store	https://www.aliexpress.com/store/1102008555?s pm=a2g0o.detail.0.0.23ebxS00xS00Cz
4	Beautiful baby-Store	https://www.aliexpress.com/store/1101793896?s pm=a2g0o.detail.0.0.68163591R0XSOf
5	Bing Manson Store	https://www.aliexpress.com/store/1102247537?s pm=a2g0o.detail.0.0.55786354d64HeD
	BOQU Store	
6	Houma Jifangyuan Trading Co., Ltd.	https://www.aliexpress.com/store/1101232026?s pm=a2g0o.detail.0.0.4487xeRhxeRhpA
7	Boutique Women Clothing	https://www.aliexpress.com/store/1102764145?s pm=a2g0o.detail.0.0.4e96LdhOLdhOrk
8	Caiyi Store	https://www.aliexpress.com/store/1101797889?s pm=a2g0o.detail.0.0.494fHQarHQarOC
9	Casual & Comfortable Clothes Store	https://www.aliexpress.com/store/1101367105?s pm=a2g0o.detail.0.0.159eM7T0M7T0Nd
10	CHIC Store	https://www.aliexpress.com/store/1101359417?s pm=a2g0o.detail.0.0.9d8fp1gXp1gXUT
11	CIKINI Official Store	https://www.aliexpress.com/store/1100833964?s pm=a2g0o.detail.0.0.3ddb2d5fTZ8z76
12	Clothes Life Store Store	https://www.aliexpress.com/store/1101831949?s pm=a2g0o.detail.0.0.a71617344JQqBB
13	Colonghsou Dthyo Store	https://www.aliexpress.com/store/1102154135?s pm=a2g0o.detail.0.0.2dc9Z2HfZ2HfcQ
14	Fall In Love With You Clothes Store	https://www.aliexpress.com/store/1103079606?s pm=a2g0o.detail.0.0.5f02WKvhWKvhLN&sort Type=bestmatch_sort
15	Fashion Women Clothing	https://www.aliexpress.com/store/1101830142?s pm=a2g0o.detail.0.0.3ab83f71Piosno
16	Fat Large Size Swimsuit Store	https://www.aliexpress.com/store/1101604842?s pm=a2g0o.detail.0.0.320071ddS0Y7yU
17	Fazhifan Fashion Women's Wear Store	https://www.aliexpress.com/store/1103051184?s pm=a2g0o.store_pc_home.pcShopHead_200648 3789284.0
18	GG BOND Store	https://www.aliexpress.com/store/1103054206?s pm=a2g0o.detail.0.0.47c54JTC4JTCpQ
19	Girl Showing Store	https://www.aliexpress.com/store/1102409547?s pm=a2g0o.detail.0.0.1ae80Fnk0Fnk04

Defendant No.	Seller's Name	Link to Seller's Page
20	Goumu Store	https://www.aliexpress.com/store/1101265565?s pm=a2g0o.store_pc_home.pcShopHead_766148 5.0
21	IDolly's Bag Store	https://www.aliexpress.com/store/1101343921?s pm=a2g0o.detail.0.0.46496ca8HQinys
22	Infashion Items Store	https://www.aliexpress.com/store/1101096726?s pm=a2g0o.detail.0.0.557dTOLWTOLWZz
23	integrity big's store	https://www.aliexpress.com/store/1102552405?s pm=a2g0o.detail.0.0.4a46vfFEvfFEiV&sortTyp e=bestmatch_sort
24	IOWBFNYS Customize Dropship to Abroad Store	https://www.aliexpress.com/store/1101659462?s pm=a2g0o.detail.0.0.6d6ciTwBiTwBXt
25	Large Size Swimsiut Store	https://www.aliexpress.com/store/1101343201?s pm=a2g0o.detail.0.0.a2e2mXAAmXAAzt
26	LGAH Store	https://www.aliexpress.com/store/1102699149?s pm=a2g0o.detail.0.0.2546ffc2FkpLmb
27	LIH HUA Official Store	https://www.aliexpress.com/store/1102526343?s pm=a2g0o.detail.0.0.5bd4iP8qiP8qLK&sortTyp e=bestmatch_sort
28	Lipswag Styles Store	https://www.aliexpress.com/store/1101312836?s pm=a2g0o.detail.0.0.1b4bh4bxh4bxxu
29	Lulu Clothing Store	https://www.aliexpress.com/store/1102754895?s pm=a2g0o.detail.0.0.aee43325UTsmtA
30	Mi You Pin Store	https://www.aliexpress.com/store/1102743269?s pm=a2g0o.detail.0.0.7016410cRMnAsf
31	Mygirl Newdv Store	https://www.aliexpress.com/store/1101607924?s pm=a2g0o.detail.0.0.6a0446397V0teu
32	NIUBI Animal Store	https://www.aliexpress.com/store/1101859790?s pm=a2g0o.detail.0.0.541f1d05KkOKim
33	Oufisun 53 Store	https://www.aliexpress.com/store/1102991003?s pm=a2g0o.detail.0.0.4ffaUn0KUn0K60
34	Plus Size Men T-Shirt Store	https://www.aliexpress.com/store/1101387901?s pm=a2g0o.detail.0.0.326em4zZm4zZRY
35	Quanly Store	https://www.aliexpress.com/store/1101942175?s pm=a2g0o.detail.0.0.3c08tDMktDMkBz
36	R Y 30 Store	https://www.aliexpress.com/store/1102351344?s pm=a2g0o.detail.0.0.163fcS5vcS5vsl
37	RECLOTHINGL Store	https://www.aliexpress.com/store/1102377353?s pm=a2g0o.detail.0.0.31334cc30jNtck
38	Reda-mancy Store	https://www.aliexpress.com/store/1102197006?spm= a2g0o.detail.0.0.7f868adK8adKx8

Defendant No.	Seller's Name	Link to Seller's Page
39	Sell Everything	https://www.aliexpress.com/store/1101348877?s
37	Dropshipping Store	pm=a2g0o.detail.0.0.410f772aQFh5XZ
40	SEniee Store	https://www.aliexpress.com/store/1102842290?s pm=a2g0o.detail.0.0.7c57flwZflwZ2Z
41	Shining Jewelry Clothes Store Store	https://www.aliexpress.com/store/1102936690?s pm=a2g0o.detail.0.0.84f16TYn6TYnh5
42	Shop1100065002 Store	https://www.aliexpress.com/store/1101983928?s pm=a2g0o.detail.0.0.4afb77uB77uBH2
43	Shop1102695911 Store	https://www.aliexpress.com/store/1102694896?s pm=a2g0o.detail.0.0.3815RANURANUeL
44	Shop1102723317 Store	https://www.aliexpress.com/store/1102726273?s pm=a2g0o.detail.0.0.452e5136wquRhy
45	Shop1102888276 Store	https://www.aliexpress.com/store/1102891264?s pm=a2g0o.detail.0.0.3e6dRu9rRu9rII
46	Shop1102959698 Store	https://www.aliexpress.com/store/1102977488?s pm=a2g0o.detail.0.0.f186y0fby0fb5s
47	Shop1103014677 Store	https://www.aliexpress.com/store/1103014678?s pm=a2g0o.detail.0.0.286347eduWc1Cc
48	Shop1103128934 Store	https://www.aliexpress.com/store/1103151484?s pm=a2g0o.detail.0.0.2a0eOVc0OVc09f
49	Shop1103275282 Store	https://www.aliexpress.com/store/1103271308?s pm=a2g0o.detail.0.0.17152q5D2q5Dxq
50	Shop1103312877 Store	https://www.aliexpress.com/store/1103317823?s pm=a2g0o.detail.0.0.134775e7XuUlk7
51	Shop5246287 Store	https://www.aliexpress.com/store/1101350260?s pm=a2g0o.detail.0.0.36714366EKXxFW
52	Shop5248109 Store	https://www.aliexpress.com/store/1101350775?s pm=a2g0o.detail.0.0.89b9r7rur7ruWq
53	Shop5830172 Store	https://www.aliexpress.com/store/1101489585?s pm=a2g0o.detail.0.0.361fs4rms4rm8R
54	Shop5879142 Store	https://www.aliexpress.com/store/1101402006?s pm=a2g0o.detail.0.0.5cfa4b95NSxsmK
55	Shop900235296 Store	https://www.aliexpress.com/store/1101494294?s pm=a2g0o.detail.0.0.1e4814f5JZD1EH
56	Shop911259384 Store	https://www.aliexpress.com/store/1101594906?s pm=a2g0o.detail.0.0.63d2eaf1ItGMKy
57	Shop999999 Store Store	https://www.aliexpress.com/store/1103258171?s pm=a2g0o.detail.0.0.5655IvdZIvdZ1p
58	SUB 5243272 Store	https://www.aliexpress.com/store/1101349520?s pm=a2g0o.detail.0.0.236e64ee13muG6
59	SupBora Official Store	https://www.aliexpress.com/store/1101246426?s pm=a2g0o.detail.0.0.626f2dbdEHZwkJ

Defendant No.	Seller's Name	Link to Seller's Page
60	SUWA Chicci Store	https://www.aliexpress.com/store/1101414381?s pm=a2g0o.detail.0.0.30bb25391QxHQt
61	SYJ Beautiful Clothes Store	https://www.aliexpress.com/store/1101857463?s pm=a2g0o.detail.0.0.17d00I070I07XB
62	Telaura Beachwear Store	https://www.aliexpress.com/store/1101028666?s pm=a2g0o.detail.0.0.4bb312b4Y9FRo5
63	TES Fashion Store	https://www.aliexpress.com/store/1102794032?s pm=a2g0o.detail.0.0.21a41lfk1lfk2a&sortType= bestmatch_sort
64	T-Show	https://www.aliexpress.com/store/1100877435?s pm=a2g0o.detail.0.0.1df4757c5TIyh1
65	Urban Outfit Store	https://www.aliexpress.com/store/1102991845?s pm=a2g0o.detail.0.0.676e71abtnPZbs
66	wbj_Fahison Store	https://www.aliexpress.com/store/1101947692?s pm=a2g0o.detail.0.0.afa95af4oGrKMe
67	Xinxu Official Store	https://www.aliexpress.com/store/1102019148?s pm=a2g0o.detail.0.0.4b3d571bntJ0qz
68	Yan Qun Store	https://www.aliexpress.com/store/1102648710?s pm=a2g0o.detail.0.0.ec8177d9tFynPy
69	YY Fashion Store	https://www.aliexpress.com/store/1101351554?s pm=a2g0o.detail.0.0.4b464f2c12zHc2
70	Zaran Store	https://www.aliexpress.com/store/1101690273?s pm=a2g0o.detail.0.0.56c57e2y7e2yPq
71	ZESTY International Store	https://www.aliexpress.com/store/1102756062?s pm=a2g0o.detail.0.0.3fd0Qh5oQh5oxe
72	ZJFZML ZZ Store	https://www.aliexpress.com/store/1101351035?s pm=a2g0o.detail.0.0.6db36cad6BsE1k
73	Ivey Store	https://www.aliexpress.com/store/1102160301?s pm=a2g0o.detail.0.0.567eIwGlIwGlc6
74	Little-Fish Store	https://www.aliexpress.com/store/1101528699?s pm=a2g0o.detail.0.0.2849RYsbRYsbwq
75	ODFVEBX Store	https://www.aliexpress.com/store/1101553736?s pm=a2g0o.detail.0.0.5a2b0XXu0XXukw