

**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. 24-cv-12324

Judge John J. Tharp, Jr.

Magistrate Judge Laura K. McNally

TEMPORARY RESTRAINING ORDER

Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“Leyuzhen”) filed an *Ex Parte* Motion for Entry of a Temporary Restraining Order, including a Temporary Injunction, a Temporary Asset Restraint, Expedited Discovery and Service of Process by Email and Electronic Publication, (the “Motion”) against the fully interactive, e-commerce stores operating under the seller aliases 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 Leyuzhen’s Motion in part as follows.

This Court finds, in the absence of adversarial presentation, that Leyuzhen has provided a basis to conclude that Defendants have sold products bearing unauthorized copies of Leyuzhen’s federally registered copyrights (the “Leyuzhen Copyrights”), which are protected by the registration numbers VA0002380491, VA0002380492, and VA0002379893.

This 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 Leyuzhen 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 that:

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. reproducing, distributing copies of, making derivative works of, or publicly displaying the Leyuzhen Copyrights in any manner without the express authorization of Leyuzhen;
 - b. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control, or supervision of Leyuzhen, or are sponsored by, approved by, or otherwise connected with Leyuzhen; and
 - c. 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 Leyuzhen, nor authorized by Leyuzhen to be sold or offered for sale, and which bear any of Leyuzhen's copyrights, including the Leyuzhen Copyrights, or any reproductions, counterfeit copies, or colorable imitations.
2. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.

3. Leyuzhen is authorized to issue expedited written discovery to Defendants, pursuant to Federal Rules of Civil Procedure 33, 34, and 36, 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 and 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, 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).
4. Upon Leyuzhen'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 eBay, Inc., AliExpress, Alibaba, Amazon.com, Inc., Wish.com, and Dhgate (collectively,

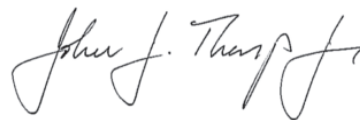
the “Third Party Providers”), shall, within seven (7) calendar days after receipt of such notice, provide to Leyuzhen expedited discovery, limited to copies of documents and records in such person’s or entity’s possession or control sufficient to determine:

- 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 and 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, and credit card associations (e.g., MasterCard and VISA).
5. Upon Leyuzhen’s request, those with notice of this Order, including the Third Party Providers as defined in Paragraph 4, 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 bearing the Leyuzhen 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. Leyuzhen 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 with a link to said website 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 "CHAOLILAI and all other Defendants identified in the Complaint" 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. Leyuzhen must provide notice to Defendants of any motion for preliminary injunction as required by Rule 65(a)(1).
9. Within seven (7) calendar days of entry of this Order, Leyuzhen shall deposit with the Court twenty-four thousand dollars (\$24,000.00) (\$1,000 per defendant), either cash 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.
11. This Temporary Restraining Order without notice is entered at 11:00 A.M. on this 16th day of December 2024 and shall remain in effect for fourteen (14) calendar days. Any motion to extend this Order must be filed by December 24, 2024.

A handwritten signature in black ink, appearing to read "John J. Tharp, Jr.", written over a horizontal line.

John J. Tharp, Jr.
United States District Judge

Date: December 16, 2024

Schedule A

Defendant No.	Seller's Name	Link to Seller's Website
1	CHAOLILAI	https://www temu.com/chaolilai-m-144984209655.html?goods_id=601099522003941&sticky_type=3&_x_sessn_id=ipv5i63c7g&refer_page_name=goods&refer_page_id=10032_1732662129181_qeeuinpzh0&refer_page_sn=10032
2	Chic She	https://www temu.com/chic-she-m-634418212601212.html?goods_id=601099579474818&sticky_type=3&_x_sessn_id=ipv5i63c7g&refer_page_name=goods&refer_page_id=10032_1732662175903_hthhewt1h6&refer_page_sn=10032
3	DTA	https://www temu.com/dta-m-6296127049005.html?goods_id=601099533317551&sticky_type=3&refer_page_name=goods&refer_page_id=10032_1732662218257_70n45luyx4&refer_page_sn=10032&_x_sessn_id=ipv5i63c7g
4	kittyshow	https://www temu.com/-m-634418212000191.html?goods_id=601099535676710&sticky_type=3&_x_sessn_id=dyondssogd&refer_page_name=goods&refer_page_id=10032_1732662290445_s5kq7pqmtu&refer_page_sn=10032
5	Kitty Style	https://www temu.com/--m-634418214704837.html?refer_page_name=bgn_verification&refer_page_id=10017_1729213388875_55bd6lvcui&refer_page_sn=10017&_x_sessn_id=e8f90jrrtn
6	mixike	https://www temu.com/mixike-m-634418211903209.html?refer_page_name=bgn_verification&refer_page_id=10017_1729220858558_wy7ozw5ihm&refer_page_sn=10017&_x_sessn_id=qud8q7pbzo
7	ou dian	https://www temu.com/-m-634418210942230.html?goods_id=601099598607839&sticky_type=3&_x_sessn_id=0k6mljcoe5&refer_page_name=goods&refer_page_id=10032_1732664665890_xcd87ufyzs&refer_page_sn=10032
8	QYD Angus	https://www temu.com/qyd--m-634418214506577.html?refer_page_name=mall&refer_page_id=10040_1729221068212_nfg7efem7w&refer_page_sn=10040&_x_sessn_id=y1rh2iowrc
9	QYD Fashion	temu.com/qyd-fashion-m-634418212337621.html?goods_id=601099633927058&sticky_type=3&_x_sessn_id=ipv5i63c7g&refer_page_name=goods

Defendant No.	Seller's Name	Link to Seller's Website
		&refer_page_id=10032_1732662367308_nzha9a6fxj&refer_page_sn=10032
10	QYD FEEL	https://www.temu.com/qyd--m-5143632012272.html?refer_page_name=bgn_verification&refer_page_id=10017_1729220998459_woufyob48f&refer_page_sn=10017&x_sessn_id=c3b7dx4j7r
11	QYD SStar	https://www.temu.com/qyd--m-634418212787725.html?refer_page_name=bgn_verification&refer_page_id=10017_1729221457723_wct91hj0y4&refer_page_sn=10017&x_sessn_id=ceyx1mpwfi
12	QYD wardrobe	https://www.temu.com/qyd--m-5143583671721.html?refer_page_name=bgn_verification&refer_page_id=10017_1729221302160_nlok6x2vdq&refer_page_sn=10017&x_sessn_id=akyjoul0bm
13	Sakaly	https://www.temu.com/-m-309560753034.html?goods_id=601099531425812&sticky_type=3&x_sessn_id=g6ohdnvfel&refer_page_name=goods&refer_page_id=10032_1732665502998_ata66fhyn0&refer_page_sn=10032
14	XINMILAN	https://www.temu.com/xinmilan-m-634418216362025.html?refer_page_name=bgn_verification&refer_page_id=10017_1729220596564_q6u49g4pad&refer_page_sn=10017&x_sessn_id=dkwp3ilu5b
15	Black Beauty Style	https://www.temu.com/-style-m-634418212157802.html?goods_id=601099534549048&sticky_type=3&x_sessn_id=g6ohdnvfel&refer_page_name=goods&refer_page_id=10032_1732665697286_no4w7fpexh&refer_page_sn=10032
16	Katlynne	https://www.temu.com/katlynne-m-286710168816.html?goods_id=601099519666136&sticky_type=3&x_sessn_id=obfh07ft49&refer_page_name=goods&refer_page_id=10032_1732665755706_y4ojum4gk5&refer_page_sn=10032
17	MiYou Clothing	https://www.temu.com/--m-5951101138548.html?refer_page_name=mall&refer_page_id=10040_1729219957622_2vwrrxl9oj&refer_page_sn=10040&x_sessn_id=lu0bozh8yk
18	Tralook	https://www.temu.com/-m-2748010367193.html?goods_id=601099570643266&sticky_type=3&x_sessn_id=ku5oevftwd&refer_page_name=goods&

Defendant No.	Seller's Name	Link to Seller's Website
		refer_page_id=10032_1729227008376_jq2cnmoisf&refer_page_sn=10032
19	YINUO	https://www temu.com/-m-2571677166332.html?refer_page_name=mall&refer_page_id=10040_1729219740301_hwl nh04zze&refer_page_sn=10040&_x_sessn_id=wzwdibqifp
20	cansheng	https://www temu.com/us-es/cansheng-m-3598609741036.html?goods_id=601099522536689&sticky_type=3&_x_sessn_id=c1ezlc90jg&refer_page_name=goods&refer_page_id=10032_1729236568601_rhibz05jkh&refer_page_sn=10032
21	LinNA FASHION	https://www temu.com/au/--m-634418211897059.html?goods_id=601099530776824&_x_sessn_id=vv5n6h5rr0&refer_page_name=goods&refer_page_id=10032_1729216829474_ytn cgp pkhn&refer_page_sn=10032&is_back=1
22	MENG NV	emu.com/-nv-m-5619559067690.html?goods_id=601099517569101&sticky_type=3&_x_sessn_id=qp5txoujgl&refer_page_name=goods&refer_page_id=10032_1729224967941_obiwjj9lp8&refer_page_sn=10032
23	TGN	https://www temu.com/tgn-m-634418210750086.html?goods_id=601099522045593&sticky_type=3&_x_sessn_id=noi58t3dfu&refer_page_name=goods&refer_page_id=10032_1729218320892_fhpc41xtqi&refer_page_sn=10032
24	YiSHION GIRLS	https://www temu.com/-girls-m-4087291654381.html?goods_id=601099520166527&sticky_type=3&refer_page_name=goods&refer_page_id=10032_1732667058969_gd7yjb5mpb&refer_page_sn=10032&_x_sessn_id=rai16ld864