

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

HONG KONG YU'EN E-COMMERCE 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-12483-EEB-MDW**

**Honorable Judge Elaine E. Bucklo  
Magistrate M. David Weisman**

HEARING DATE: January 15, 2025  
HEARING TIME: 9:45 AM  
COURTROOM: 2243

**PLAINTIFF'S MOTION TO EXTEND  
THE TEMPORARY RESTRAINING ORDER**

Plaintiff HONG KONG YU'EN E-COMMERCE CO. LTD., ("Plaintiff"), by and through its counsel, the Bayramoglu Law Offices, LLC, submits this motion (the "Motion") to extend the Temporary Restraining Order ("TRO"), entered by this Court on December 26, 2024 [Dkt. No. 23], which is set to expire on January 9, 2025, for an additional period of fourteen (14) days up to and including January 23, 2025. This is Plaintiff's first request for an extension of the TRO. Plaintiff's application is based upon this Motion, the memorandum in support the motion, the Declaration of Shawn A. Mangano (the "Mangano Decl.") filed herewith, together with any argument of counsel entertained by the Court.

Based on the foregoing, Plaintiff respectfully requests that the TRO [Dkt. No. 23] be extended for a period of fourteen (14) days up to and including January 23, 2025.

DATED: January 9, 2025

Respectfully submitted,

By: /s/ Shawn A. Mangano  
Shawn Mangano (IL Bar No. 6299408)

**BAYRAMOGLU LAW OFFICES LLC**  
1540 West Warm Springs Road Ste. 100  
Henderson, NV 89014  
Tel: (702) 462-5973 | Fax: (702) 553-3404  
shawnmangano@bayramoglu-legal.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of January 2025, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and distributed to ecommerce platform, Amazon.

Respectfully submitted,

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (IL Bar No.6299408)  
**BAYRAMOGLU LAW OFFICES LLC**

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**MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION TO EXTEND  
TEMPORARY RESTRAINING ORDER**

Plaintiff Hong Kong Yu'En E-Commerce Co. Limited, ("Plaintiff"), by and through its counsel, the Bayramoglu Law Offices, LLC, submits this Memorandum in Support of its Motion to Extend Temporary Restraining Order (the "Motion"). In support of the Motion, Plaintiff states as follows:

Plaintiff seeks extension of the Temporary Restraining Order ("TRO") issued by this Court on December 26, 2024 [Dkt. No. 23] to provide the Defendants listed in Schedule A time to respond after receiving notice of this lawsuit and respond to the complaint while keeping the status quo. (Mangano Decl. 9.) Absent this additional time, the named Schedule "A" Defendants (the "Defendants") will not have enough notice to respond prior to the current expiration of the TRO. ( *d.* 5.)

Pursuant to Fed. R. Civ. P. Rule 65(b), the Court may extend a temporary restraining order for a period not to exceed fourteen (14) days upon a showing of good cause. Fed.R.Civ.P. 65(b).

This Court and other courts in the Seventh Circuit have found good cause to extend a TRO where service and expedited discovery responses from third-party platforms remain pending. *See Mi higan . elleni ty ree Sho s S.A.* No. 2:11-CV-00742, 2011 WL 4368418, at 1 (E.D. Wis. Sept. 19, 2011) (the court granted motion to extend temporary restraining order to effectuate service) *loan e ot. o . S hneider*, 647 F. Supp. 3d 620, 627 (N.D. Ill. 2022) (granting extensions of temporary restraining order for expedited discovery).

In this case, Plaintiff has worked diligently to serve the TRO and the associated subpoena on the Platform, Amazon. (Mangano Decl. 6.) Plaintiff also has out for personal service on the Platform’s U.S. entity, Amazon.com at its Registered Agent and has emailed these materials to the Platform’s designated TRO response email tro-notices@amazon.com on December 26, 2024. ( d.) The Platform acknowledged receipt of the TRO and associated subpoena on December 27, 2024, and was able to provide the Defendants contact information on January 2, 2025. ( d. 7)

An extension of the TRO is necessary so that Plaintiff can effectuate electronic service of process authorized by the Court, provide Defendants enough time to respond to the complaint and TRO, as well as notice of Plaintiff’s anticipated motion to enter preliminary injunction. ( d. 8-9.) Moreover, absent an extension of the TRO, Plaintiff is exposed to immediate and continuing irreparable harm because Defendants would likely learn of these proceedings, abandon their storefronts on third-party platforms, transfer their assets to offshore accounts outside of the jurisdiction of this Court, and frustrate Plaintiff’s ability to obtain its requested relief. ( d.) Furthermore, these circumstances demonstrate “good cause” for the requested 14-day extension under Federal Rule of Civil Procedure 65(b). ( d.)

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For the foregoing reasons, Plaintiff respectfully requests that the TRO [Dkt. No. 23] be extended for a period of fourteen (14) days up to and including January 23, 2025.

DATED: January 9, 2025

Respectfully submitted,

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

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Respectfully submitted,

By: /s/ Shawn A. Mangano  
Shawn A. Mangano (IL Bar No.6299408)  
**BAYRAMOGLU LAW OFFICES LLC**

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**DECLARATION OF SHAWN A. MANGANO ES . IN SUPPORT OF PLAINTIFF'S  
MOTION TO EXTEND TEMPORARY RESTRAINING ORDER**

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

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

2. I make this declaration in support of Plaintiff's First Motion to Extend Temporary Restraining Order (the "Motion").

3. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am the lead attorney for Plaintiff HONG KONG YU'EN E-COMMERCE CO. LIMITED. ("Plaintiff").

I make this declaration from my matters within my own knowledge unless stated otherwise.

4. Plaintiff filed its Motion for *Ex Parte* Temporary Restraining Order including a Temporary Injunction, a Temporary Asset Restraint, Expedited Discovery, and Service of Process by E-Mail and/or Electronic Publication on December 4, 2024 [Dkt. No. 7].

5. The Court granted Plaintiff's motion and issued a signed Temporary Restraining Order (the "TRO") on December 26, 2024 [Dkt. No. 23], which is effective for a period of fourteen (14) days and is set to expire on January 9, 2025. This is Plaintiff's first request for an extension of the TRO.

6. Since entry of the TRO, Plaintiff has been working diligently to effectuate service on the designated third-party online sales platform, Amazon (the "Platform"). These efforts include serving the Platform's U.S.-based corporate entity and emailing the Platform at its designated TRO email address.

7. The Platform acknowledged receipt of the TRO and the associated subpoena via email on December 27, 2024, and was able to provide the Defendants contact information on January 2, 2025.

8. Plaintiff electronically served the Defendants with a copy of the Complaint, Summons, and TRO on January 3, 2025 [Dkt. No. 29], and the First Amended Complaint on January 6, 2025 [Dkt. No. 30].

9. An extension of the TRO allows Defendants listed in Schedule "A" time to respond after receiving notice of this lawsuit and respond to the complaint while keeping the status quo. Absent this additional time, Defendants named Schedule "A" Defendants (the "Defendants") will not have enough notice to respond prior to the current expiration of the TRO. Moreover, these circumstances justify "good cause" for extending the TRO under Federal Rule of Civil Procedure 65(b).

10. For the foregoing reasons, and the reasons stated in Plaintiff's Memorandum in Support of the Motion for TRO [Dkt. No. 7], there is a high probability that Plaintiff will suffer immediate and irreparable injury, loss, or damage if the TRO is not extended.

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

Executed on January 9, 2025, in Las Vegas, Nevada.

Respectfully Submitted,

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

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Shawn A. Mangano (IL Bar No.6299408)  
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