

**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.: 1:25-cv-01375-JLA-DPM

**Honorable Jorge L. Alonso
Magistrate Daniel P. McLaughlin**

HEARING DATE: April 16, 2025
HEARING TIME: 9:30 AM CST

PRELIMINARY INJUNCTION ORDER

Plaintiff HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED (“[PLAINTIFF]”) filed a Motion for Entry of a Preliminary Injunction against the against the fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (collectively, “Defendants”) and using at least the domain names identified in Schedule A (the “Defendant Domain Names”) and 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 in part as follows.

This Court finds [PLAINTIFF] has provided notice to Defendants in accordance with the Temporary Restraining Order entered March 19, 2025, [DOCKET NO. 19] (“TRO”), and Federal Rule of Civil Procedure 65(a)(1).

¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces.

This Court also 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 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 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. 15-1, Ex. 1 to the Complaint, which includes Plaintiff's Copyrights: (1) VA0002379881; (2) VA0002379888; (3) VA0002379893; (4) VA0002379894; (5) VA0002379895; (6) VA0002379897; (7) VA0002379930. [In this case, [PLAINTIFF] has also presented evidence that each Defendant e-commerce store is reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores through which Illinois residents can and do purchase products using unauthorized use and display of Plaintiff's Copyrights. *See* Docket No.[15-10], which includes evidence confirming that each Defendant e-commerce store does stand ready, willing and able to ship its counterfeit goods to customers in Illinois using the unauthorized use and display of Plaintiff's Copyrights.]

This Court also finds that the injunctive relief previously granted in the TRO should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of [PLAINTIFF]'s previously granted Motion for Entry of a TRO establishes that [PLAINTIFF] has demonstrated a likelihood of success on the merits;

that no remedy at law exists; and that [PLAINTIFF] will suffer irreparable harm if the injunction is not granted.

Specifically, PLAINTIFF has proved a prima facie case of copyright infringement because (1) PLAINTIFF is the lawful assignee of all right, title and interest in and to the federally registered copyright(s), (2) Defendants make, use, offers for sale, sells, and/or imports into the United States for subsequent sale or uses knock-off products that infringes directly and/or indirectly PLAINTIFF'S federally registered copyrights and (3) an ordinary observer would be deceived into thinking the Infringing Products were the same as PLAINTIFF'S federally registered copyrights. Furthermore, Defendants' continued, and unauthorized use of PLAINTIFF'S federally registered copyrights irreparably harms PLAINTIFF through loss of customers' goodwill and reputational harm. Monetary damages fail to address such damage and, therefore, [PLAINTIFF] has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions. 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 preliminarily 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 product or is not authorized by PLAINTIFF to be sold in connection with the PLAINTIFF'S Copyrights;

- b. 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]; and
 - 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.
2. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.
3. 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, 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.

4. Upon [PLAINTIFF]'s request, Defendants and any third party with actual notice of this Order who is providing services for any of Defendants, or in connection with any of Defendants' Online Marketplaces, including, without limitation, any online marketplace platforms such as eBay, Inc., AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc., ContextLogic Inc. d/b/a Wish.com ("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, Inc. ("PayPal"), Alipay, Wish.com, 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).

5. Upon [PLAINTIFF]'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 using the [PLAINTIFF] 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, 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 service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Pleadings, this Order, and other relevant documents on a website and by sending an e-mail with a link to said website to the 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’s Pleading(s) [DOCKET NO. 1] and Exhibits [1]-[3] thereto, Schedule A to the Pleading(s) [DOCKET NO. 1-2], Exhibit [1] to the Declaration of [Katherine M. Kuhn] [DOCKET NO. 4-2], and the TRO [DOCKET NO. 19] are unsealed.
9. 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.
10. The \$[43,000] bond posted by [PLAINTIFF] shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

SO ORDERED:

A handwritten signature in black ink, appearing to be "J. Alonso", enclosed within a large, loopy oval stroke.

Honorable Jorge L. Alonso
United States District Judge

Dated: April 16, 2025

Schedule A

Defendant No.	Seller's Name	Link to Seller's Website
VA0002379881		
1	Little WildcatLM	https://www.tiktok.com/view/product/1729430180897001883
2	ZIBUYU	https://www.tiktok.com/view/product/1729399395674854000
VA0002379888		
3	ANGELS storenbhu	https://www.tiktok.com/view/product/1729473900072112562
4	Budget Couture	https://www.tiktok.com/view/product/1729566099075797050
5	CHAOLILAI	https://www.tiktok.com/view/product/1729420789486490445
6	Curvy Inventory	https://www.tiktok.com/view/product/1729562585976574079
7	DAISY SUNSHINE	https://www.tiktok.com/view/product/1729419528973423435
8	DHRYRBHC SHOP	https://www.tiktok.com/view/product/1729473897870495918
9	Dongguan Yujian Appa	https://www.tiktok.com/view/product/1729577477718119019
10	Enjoymall VA0002379894	https://www.tiktok.com/view/product/1729452298182628228
11	Ginoa	https://www.tiktok.com/view/product/1729418433353846962
12	HAPPY GIRL'S CLOTHES VA0002379897	https://www.tiktok.com/view/product/1729427401986905040
13	Ideal wardrobe	https://www.tiktok.com/view/product/1729491453430108809
14	Inpetal	https://www.tiktok.com/view/product/1729415320063874047
15	Kaibom	https://www.tiktok.com/view/product/1729454530553811883
16	Large size	https://www.tiktok.com/view/product/1729488417930122113
17	Love You So VA0002379895 VA0002379897 VA0002379930	https://www.tiktok.com/view/product/1729451269685482154
18	luckbea	https://www.tiktok.com/view/product/1729576025221009855
19	Majestical Gems	https://www.tiktok.com/view/product/1729572844268983237
20	Mermaid princess	https://www.tiktok.com/view/product/1729421004100571152
21	MT Swimwear VA0002379897	https://www.tiktok.com/view/product/1729424907962258362
22	SEXYAPPAREL23 VA0002379894 VA0002379930	https://www.tiktok.com/view/product/1729472074984886529
24	Soulful earthcraft VA0002379897	https://www.tiktok.com/view/product/1729446800630976805
25	Taryndoria	https://www.tiktok.com/view/product/1729548981844611701
26	ValueFashionShop	https://www.tiktok.com/view/product/1729429213106770918
27	Yewaysz	https://www.tiktok.com/view/product/1729435798090388094
28	YuHan. VA0002379930	https://www.tiktok.com/view/product/1729463295886397813
VA0002379893		
29	XWD Find Pretty	https://www.tiktok.com/view/product/1729388550330552750