

**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-03065-MSS-MV

Honorable Manish S. Shah

TEMPORARY RESTRAINING ORDER

Plaintiff Hong Kong Leyuzhen Technology Co. Limited, (“PLAINTIFF”) filed a Motion for Entry of a Temporary Restraining Order and Other Relief (the “Motion”) against the fully interactive, e-commerce stores¹ operating under the domain names on Amazon 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, on an ex parte and preliminary basis, that Defendants have engaged in the unauthorized use and display of PLAINTIFF’s federally registered copyrights (the “Plaintiff’s Copyrights,” VA0002382152 and VA0002384843). Accordingly, the Court finds that PLAINTIFF

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

stands a likelihood of success on the merits of its copyright infringement and state law deceptive trade practices claims for relief.

The Court additionally finds that issuance of the requested injunctive relief would be in the general public interest of enforcing registered intellectual property, and an order to stop infringement does not harm Defendants.

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 Katie M. Kuhn 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 redirect account information, thereby defeating PLAINTIFF's effort to identify Defendants and enforce its copyright. 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 using or displaying the Plaintiff's Copyrights, in any medium, whether it be print, digital or otherwise;

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, Afterpay, Klarna or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

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 TokTik 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. 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 using the Plaintiff's Copyrights.

5. 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.

6. PLAINTIFF must provide notice to Defendants of any motion for preliminary injunction as required by Rule 65(a)(1).

7. Within seven (7) business days of entry of this Order, PLAINTIFF shall deposit with the Court \$3,000.00, 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.

8. 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.

This Temporary Restraining Order without notice is entered at 1:15 P.M. on this 21st day of April, 2025 and shall remain in effect for fourteen (14) calendar days.



Honorable Judge Manish S. Shah
United States District Judge

Defendant No.	Seller's Name	Link to Seller's Website
VA0002382152		
1	LMSXCT	https://www.amazon.com/gp/help/seller/at-a-glance.html/ref=dp_merchant_link?ie=UTF8&seller=A35DJEA78ZUPWW&asin=B09SLBMVCS&ref_=dp_merchant_link
2	ZonJie	https://www.amazon.com/sp?ie=UTF8&seller=A7MES8ZDPM T86&asin=B09XJVNBB3&ref_=dp_merchant_link&isAmazonFulfilled=1
VA0002384843		
3	LalaLin	https://www.amazon.com/sp?ie=UTF8&seller=A183295JQ6L5 VE&asin=B0B9N3647N&ref_=dp_merchant_link&isAmazonFulfilled=1

**Rotita14-2021.[Group registration of published photographs.747
photographs. 2021-01-02 to 2021-12-31]**

Actions

- **Registration Number / Date** VA0002382152 / 2023-12-25
- **Type of Work** Visual Material
- **Title**
Rotita14-2021.[Group registration of published photographs.747 photographs. 2021-01-02 to 2021-12-31]
- **Application Title**
 - Rotita14-2021
- **Date of Creation** 2021
- **Copyright Claimant**
 - HONGKONG쥬EYUZHEN쥬ECHNOLOGY쥬O.,LIMITED. Address:
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., HONGKONG.
- **Authorship on Application**
 - HONGKONG쥬EYUZHEN쥬ECHNOLOGY쥬O.,LIMITED, Domicile: Hong Kong; employer for hire; Citizenship: Hong Kong. Authorship: photographs.
- **Description**
 - 747 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.

Basis for Registration: Registration does not extend to any useful article depicted. Registration extends to deposited photographs only. 17 USC 101, 102(a), and 113.
- **Nation of First Publication**

United States
- **Publication Date Range**
 - 2021-01-02 to 2021-12-31
- **Names**
 - [HONGKONG쥬EYUZHEN쥬ECHNOLOGY쥬O., LIMITED](#)

Rotita17-2021.[Group registration of published photographs.749 photographs. 2021-01-05 to 2021-12-31]

Actions

- **Registration Number / Date** **VA0002384843** / 2024-03-01
- **Type of Work** Visual Material
- **Title**
Rotita17-2021.[Group registration of published photographs.749 photographs. 2021-01-05 to 2021-12-31]
- **Application Title**
 - Rotita17-2021
- **Date of Creation** 2021
- **Copyright Claimant**
 - HONGKONG쥬EYUZHEN쥬ECHNOLOGY쥬O.,LIMITED. Address: FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., HONGKONG.
- **Authorship on Application**
 - HONGKONG쥬EYUZHEN쥬ECHNOLOGY쥬O.,LIMITED, Domicile: Hong Kong; employer for hire; Citizenship: Hong Kong. Authorship: photographs.
- **Description**
 - 749 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.

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- **Nation of First Publication**

United States
- **Publication Date Range**
 - 2021-01-05 to 2021-12-31
- **Names**
 - [HONGKONG쥬EYUZHEN쥬ECHNOLOGY쥬O.,LIMITED](#)