

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

KAILINNA,

Defendant.

**Case No.: 1:25-cv-02837-EEC-JC**

**Honorable Judge Edmond E. Chang**

**Magistrate Jeffrey Cole**

**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 store operating under the domain name on temu.com attached hereto (the “Defendant”) and using at least the online marketplace accounts identified in the Complaint (the “Online Marketplace”). 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 Defendant KAILINNA because Defendant directly targets its business activities toward consumers in the United States, including consumers in the State of Illinois. Specifically, PLAINTIFF has provided a basis to conclude that Defendant has 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. 1-1, Exhibit 1 to the Complaint, which includes the federally registered copyrights (1) VA0002379888; (2) VA0002379894; and (3) VA0002379899, 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 temu 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. [1-2 and 2-2] Exhibit 2 to the Complaint, which includes screenshot evidence and internet links confirming that 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 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 Defendant on its 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 Defendant in this case because there is credible evidence to conclude it is 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 Katherine 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, Defendant 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. Defendant, its officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with it 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;
- 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 Defendant's 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. Defendant shall not transfer or dispose of any money or other of Defendant's assets in any of Defendant's financial accounts.

2. PLAINTIFF is authorized to issue expedited written discovery to Defendant, pursuant to Federal Rules of Civil Procedure 33, 34, 36, and 45 related to:

- a. the identities and locations of Defendant, its 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 Defendant's operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendant's financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and
- c. any financial accounts owned or controlled by Defendant, including its 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).

- d. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afiliast 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 the Defendant, or in connection with Defendant's 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 Defendant, its 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 Defendant's operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendant's financial accounts, including Defendant's sales and listing history related to their respective Online Marketplaces; and
- c. any financial accounts owned or controlled by Defendant, including its 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 Domain Names and make them inactive and untransferable until further order by this Court.

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 Defendant in connection with the sale of counterfeit, knock-off and infringing goods using the Plaintiff's Copyrights.

6. Any Third-Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, Afterpay, Klarna, and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:

- a. locate all accounts and funds connected to Defendant's seller aliases, including, but not limited to, any financial accounts connected to the information listed in the Complaint, and any e-mail addresses provided for Defendant by third parties; and
- b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendant's assets until further order by this Court.

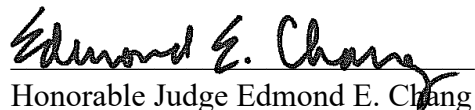
7. PLAINTIFF may provide notice of the proceedings in this case to Defendant, including notice of the preliminary injunction hearing, service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order, and other relevant documents on a website and by sending an e-mail to any e-mail addresses provided for Defendant by third parties. The Clerk of the Court is directed to issue a single original summons in the name of "KAILINNA" that shall apply to Defendant. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendant receives from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendant of the pendency of the action and afford them the opportunity to present their objections.

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

9. Within seven (7) business days of entry of this Order, PLAINTIFF shall deposit with the Court \$1,000.00, 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. The Defendant that is 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 11:15 A.M. on this 14<sup>th</sup> day of April, 2025 and shall remain in effect for fourteen (14) calendar days. Any motion to extend this Order must be filed by April 21, 2025.

  
Honorable Judge Edmond E. Chang  
United States District Judge

**Defendant KAILINNA Infringement**

VA0002379888



Defendant Image

Rotita Image

[https://www.temu.com/goods.html?\\_bg\\_fs=1&goods\\_id=601099531897981](https://www.temu.com/goods.html?_bg_fs=1&goods_id=601099531897981)

VA002379894



Defendant Image

Rotita Image

[https://www.temu.com/goods.html?\\_bg\\_fs=1&goods\\_id=601099532008858](https://www.temu.com/goods.html?_bg_fs=1&goods_id=601099532008858)

VA0002379899



Defendant Image

Rotita Image

[https://www.temu.com/goods.html?\\_bg\\_fs=1&goods\\_id=601099531906268](https://www.temu.com/goods.html?_bg_fs=1&goods_id=601099531906268)

**Rotita3-2022.[Group registration of published photographs.306 photographs.  
2022-01-04 to 2022-12-29]**

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Actions

- **Registration Number / Date** VA0002379888 / 2023-11-12
- **Type of Work** Visual Material
- **Title**  
Rotita3-2022.[Group registration of published photographs.306 photographs. 2022-01-04 to 2022-12-29]
- **Application Title** Rotita3-2022
- **Date of Creation** 2022
- **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, Byramoglu Law Offices, 1540 West Warm Springs Road, Suite 100, Henderson, NV, 89014, (702) 462-5973, tm@bayramoglu-legal.com
- **Description**
  - 306 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**
  - 2022-01-04 to
  - 2022-12-29
- **Names**
  - [HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED](#)

**Rotita6-2022.[Group registration of published photographs.448 photographs.  
2022-01-04 to 2022-12-30]**

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Actions

- **Registration Number / Date** VA0002379894 / 2023-11-12
- **Type of Work** Visual Material
- **Title**  
Rotita6-2022.[Group registration of published photographs.448 photographs. 2022-01-04 to 2022-12-30]
- **Application Title** Rotita6-2022
- **Date of Creation** 2022
- **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.
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  - Nazly Aileen Bayramoglu, Bayramoglu Law Offices, 1540 West Warm Springs Road, Suite 100, Henderson, NV, 89014, (702) 462-5973, tm@bayramoglu-legal.com
- **Description**
  - 448 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**
  - 2022-01-04 to
  - 2022-12-30
- **Names**
  - [HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED](#)

**Rotita7-2023.[Group registration of published photographs.534 photographs.  
2023-07-28 to 2023-11-08]**

Share

Actions

- **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@bayramoglu-legal.com
- **Description**
  - 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**
  - 2023-07-28 to
  - 2023-11-08
- **Names**
  - [HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED](#)