

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE “A” HERETO,

Defendants.

Case No. 1:25-cv-04225-CPK-KLHH

Honorable Charles P. Kocoras

Magistrate Keri L. Holleb Hotaling

PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff hereby moves this Honorable Court for entry of a Preliminary Injunction (the “Motion”). The scope of the requested Preliminary Injunction is substantially identical to the Temporary Restraining Order (the “TRO”) entered April 25, 2025, which was extended to May 23, 2025, and extended again up to and including June 6, 2025. [Dkt. Nos. 18, 24, 28]. Plaintiff’s Motion, for which notice will be provided, is properly submitted to the Court on a non-*ex parte* basis. A Memorandum of Law in Support, and Declaration of Joseph W. Droter is filed concurrently with this Motion.

DATED: May 29, 2025

Respectfully submitted,

By: */s/ Joseph W Droter*
Joseph W. Droter (Bar No. 6329630)
Katherine M. Kuhn (Bar No. 6331405)
BAYRAMOGLU LAW OFFICES LLC
233 S. Wacker Drive, 44th Floor, #57
Chicago, IL 60606
Tel: (702) 462-5973 Fax: (702) 553-3404
joseph@bayramoglu-legal.com
katherine@bayramoglu-legal.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of May 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, Alibaba.

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

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Attorneys for Plaintiff

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Defendants.

Case No. 1:25-cv-04225-CPK-KLHH

Honorable Charles P. Kocoras

Magistrate Keri L. Holleb Hotaling

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF’S
MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED (“Plaintiff”) submits this Memorandum of Law in support of its Motion for Preliminary Injunction (the “Motion”).

I. INTRODUCTION

Plaintiff Hong Kong Leyuzhen Technology Co., Ltd., (“Plaintiff”) initiated this action against the Defendants listed in Schedule “A”, (“Defendants”), for infringement of United States Copyright Registration No. VA0002379904 (the “Copyrights”). As alleged in Plaintiff’s Complaint [Dkt. No. 1], Defendants are knowingly and willfully offering for sale, selling, and/or importing into the United States, through the unauthorized use of the Copyright on their Online Store, competing or counterfeit inferior products.

A. Procedural History

On April 25, 2025, this Court granted Plaintiff’s Temporary Restraining Order (“TRO”) request on an *ex parte* basis, extended to May 23, 2025, and extended again to and including

June 6, 2025. [Dkt. Nos. 18, 24, 28]. Substantively, the TRO authorized and directed Plaintiff to provide notice of these proceedings and the preliminary injunction hearing to Defendants by electronically publishing a link to the Complaint, the TRO, and other relevant documents on a website, together with effectuating electronic service by email transmission to any addresses provided for Defendant by third party online platforms. [*Id.* ¶ 7.] On May 26, 2025, Alibaba produced the Defendants' email address. (Droter Decl. ¶ 5.) Plaintiff effectuated electronic service of process on the Defendants on May 27, 2025. (*Id.* ¶ 6.)

Based on the foregoing procedural history, including having effectuated electronic service of process to the Defendant as required by the TRO, Plaintiff respectfully requests the Court now enter a Preliminary Injunction in this matter. Plaintiff further requests the Court issue a Minute Order setting a deadline for Defendants to submit any oppositions to the Motion prior to conducting a scheduled hearing. Plaintiff will immediately serve Defendants electronically with the requested Minute Order once it is issued by the Court. Substantively, as stated earlier, and as argued below, Plaintiff's request for issuance of a preliminary injunction is in full compliance with the applicable standards for granting such relief.

II. ARGUMENT

A. **This Court has already found that the requirements for a preliminary injunction have been met.**

Plaintiff respectfully requests that this Court convert the TRO to a preliminary injunction to prevent further illegal conduct by Defendants. To date, Plaintiff has presented virtually identical grounds for the issuance of preliminary injunctive relief addressing allegations of Internet-based counterfeiting, and such relief has been granted, by numerous courts in this judicial district. *See, e.g., Hong Kong Leyuzhen Tech. Co., Ltd. v. The Individuals*, Case No. 1:24-cv-01807, Dkt. No.

63 (Kendall, C.J.); *Hong Kong Leyuzhen Tech. Co., Ltd. v. The Individuals*, Case No. 1:24-cv-02939, Dkt. No. 83 (Kennelly, J.); *Hong Kong Leyuzhen Tech. Co., Ltd. v. The Individuals*, Case No. 1:24-cv-03210, Dkt. No. 71 (Pacold, J.); *Hong Kong Leyuzhen Tech. Co., Ltd. v. The Individuals*, Case No. 1:24-cv-01652, Dkt. No. 30 (Daniel, J.); *Hong Kong Leyuzhen Tech. Co., Ltd. v. The Individuals*, Case No. 1:24-cv-01547, Dkt. No. 41 (Wood, J.); *Hong Kong Leyuzhen Tech. Co., Ltd. v. The Individuals*, Case No. 1:24-cv-01705, Dkt. No. 43 (Cummings, J.). Plaintiff submits that these numerous prior decisions demonstrate the merits of the company's current request for issuance of preliminary injunctive relief by this Court. Accordingly, Plaintiff asserts that the Court should grant the Motion and enter a Preliminary Injunction against the Defendants. Further, Plaintiff asserts that no circumstances have changed since Plaintiff had previously requested relief in the form of a Temporary Restraining Order. As such, Plaintiff is unaware of any new information that would affect the Court's original analysis.

Since the standard for granting a TRO and the standard for granting a preliminary injunction are identical in this Circuit, the requirements for entry of a preliminary injunction extending the TRO have been satisfied. See, e.g. *Charter Nat'l Bank & Trust v. Charter One Fin., Inc.*, No. 1:01-cv-00905, 2001 WL 527404, *1 (N.D. Ill. May 15, 2001) (citations omitted). To be entitled to preliminary injunctive relief, the moving party must first show that it has (1) there is a reasonable likelihood that Plaintiff will succeed on the merits; (2) Plaintiff will suffer irreparable injury if the order is not granted because there is no adequate remedy at law; (3) the balance of hardships tips in Plaintiff's favor; and (4) the public interest will not be disserved by the injunction. *Columbia Pictures Indus., Inc. v. Jasso*, 927 F. Supp. 1075, 1076 (N.D. Ill. 1996). As this Court has already entered a TRO on May 1, 2025, it has already found that the above requirements have been satisfied.

If these threshold requirements are met by the moving party, the court then “exercise[s] its discretion to determine whether the balance of harms weighs in favor of the moving party or whether the nonmoving party or public interest will be harmed sufficiently that the injunction should be denied.” *Christian Legal Soc’y v. Walker*, 453 F.3d 853, 859 (7th Cir. 2006). “This process involves engaging in what we term the sliding scale approach; the more likely the [moving party] will succeed on the merits, the less the balance of irreparable harms need favor the [moving party’s] position.” *Ty, Inc. v. Jones Group, Inc.*, 237 F.3d 891, 895 (7th Cir. 2001). The sliding scale approach is not mathematical in nature, rather “it is more properly characterized as subjective and intuitive, one which permits district courts to weigh the competing considerations and mold appropriate relief.” *Id.* at 895-896. The greater the movant’s likelihood of succeeding on the merits, the less the balancing of harms need be in his favor. *See Eli Lilly & Co. v. Natural Answers, Inc.*, 233 F.3d 456, 461 (7th Cir. 2000).

As established by the evidence in the Declaration of Katherine M. Kuhn Docket No.15-7 with the submission of the motion for TRO, and by this Court’s entry of the TRO, the above requirements for entry of a preliminary injunction have been satisfied. The record establishes that through Defendants’ illegal operations, Defendants have infringed upon Plaintiff’s federally registered Copyright: VA0002379904. Thus, plaintiff is entitled to preliminary injunctive relief.

III. THE CURRENT BOND IS SUFFICIENT TO PROTECT DEFENDANTS’ INTERESTS.

The Court has previously required Plaintiff to post a bond in the sum of \$10,000.00 in connection with issuance of the TRO [Dkt. No. 25]. The exact same circumstances, if not more, supporting the Court’s determination of this bond amount apply to Plaintiff’s request for entry of a Preliminary Injunction. Such a strong showing militates against a subsequent finding that

injunctive relief was improperly granted. Accordingly, Plaintiff requests the Court maintain the current bond amount required for issuance of the TRO for issuance of the preliminary injunction.

IV. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests the Court enter a Preliminary Injunction. If required, a minute order setting a deadline for Defendant to oppose the Motion, which Plaintiff will immediately serve Defendant with the Minute Order if issued by the Court. If a hearing on the Preliminary Injunction Motion cannot be heard prior to the current expiration of the TRO, Plaintiff requests a fourteen (14) day extension of the TRO or until there is a ruling on the Preliminary Injunction Motion. Plaintiff additionally respectfully requests the Court maintain the current bond amount required under the TRO, together with issuing any other relief that it deems just and proper.

DATED: May 29, 2025

Respectfully submitted,

By: /s/ Joseph W Droter
Joseph W. Droter (Bar No. 6329630)
Katherine M. Kuhn (Bar No. 6331405)
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katherine@bayramoglu-legal.com
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of May 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, Alibaba.

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

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Attorneys for Plaintiff

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THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE "A" HERETO,

Defendants.

Case No. 1:25-cv-04225-CPK-KLHH

Honorable Charles P. Kocoras

Magistrate Keri L. Holleb Hotaling

DECLARATION OF JOSEPH W. DROTER, ESQ.
IN SUPPORT OF PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

I, Joseph W. Droter, of the City of Chicago, in the State of Illinois, 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 Motion for Preliminary Injunction (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 one of the Attorneys for Plaintiff HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff's Motion for Temporary Restraining Order (the "TRO") was granted by the Court on April 25, 2025, which was extended to May 23, 2025, and extended again up to and including June 6, 2025. [Dkt. Nos. 18, 24, 28].

5. On May 26, 2025, the designated online platform, Alibaba, (the "Platform") provided Plaintiff with the email addresses for the named Defendants listed on Schedule "A", (the "Defendants") so that electronic service of process authorized under the TRO could be effectuated.

6. On May 27, 2025, Plaintiff effectuated electronic service of process on the Defendants.

7. Genuine and authentic copies of the unpublished decisions cited in Plaintiff's Memorandum of Law in Support of Motion for Entry of Preliminary Injunction are attached hereto as **Exhibit 1**.

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

Executed on May 29, 2025, in Chicago, Illinois.

By: /s/ Joseph W. Droter
JOSEPH W. DROTER, ESQ.

CERTIFICATE OF SERVICE

I hereby certify that on the 29th day of May 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, Alibaba.

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

BAYRAMOGLU LAW OFFICES LLC

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Attorneys for Plaintiff

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
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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. 1:24-CV-1807-VMK-GAF

**ORDER FOR PRELIMINARY
INJUNCTION**

Honorable Virginia M. Kendall

Magistrate Gabriel A. Fuentes

ORDER FOR PRELIMINARY INJUNCTION

THIS CAUSE being before the Court on Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff") Motion for Entry of Preliminary Injunction ("Motion") and this Court having heard the evidence before it hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against those numbered defendants identified in Schedule A to the Complaint, who operate fully interactive, e-commerce stores under the seller aliases identified in Schedule A (collectively, the "Seller Aliases").

The Court 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 consumers in the State of 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 on Alibaba.com 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. 11-1, Ex. 1 to the Complaint, which includes the thirty-four (34) copyrights associated with the Plaintiff's Copyrights).

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("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 Temporary Restraining Order 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 copyrights, (2) Defendants make, use, offer for sale, sell, and/or import into the United States for subsequent sale or use knock-off products that infringe directly and/or indirectly the 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. As such, this Court orders that

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be 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 Defendants' 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. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.

2. 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 Defendant's Online Marketplaces, such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com

("Wish.com"), and Dhgate (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating 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, 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.

3. Upon PLAINTIFF's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 2, shall within ten (10) business 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's

Copyrights.

4. Defendants shall be restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

5. Any Third-Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within ten (10) business 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, the e-mail addresses identified in Exhibits, 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 ordered by this Court.

6. Plaintiff is authorized to issue expedited written discovery, 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, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

7. 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.

8. Plaintiff is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

9. Plaintiff may provide notice of these proceedings 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 <https://blointernetenforcement.com/>, and by sending an e-

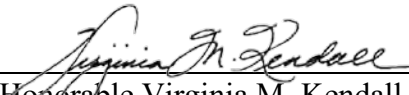
mail to the e-mail addresses identified in Exhibits and any e-mail addresses provided for Defendants by third parties that includes a link to said website. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendants receive from payment processors, 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.

10. Plaintiff has deposited with the Court five thousand dollars (\$5,000.00), as surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of wrongful restraint hereunder.

11. 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 Northern District of Illinois Local Rules.

12. This Preliminary Injunction without notice is entered at 9:30 a.m. on June 25, 2024 and shall remain in effect until Final Disposition of this case or until further order by the Court.

DATED: June 25, 2024



Honorable Virginia M. Kendall
United States District Judge

**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.: 1:24-cv-03210-MMP-SMF

Honorable Martha M. Pacold

Magistrate Sheila M. Finnegan

ORDER FOR PRELIMINARY INJUNCTION

THIS CAUSE being before the Court on Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, (“Plaintiff”) Motion for Entry of Preliminary Injunction (“Motion”) and this Court having heard the evidence before it, hereby GRANTS Plaintiff’s Motion for Entry of a Preliminary Injunction in its entirety against those remaining numbered defendants identified in the current Amended Schedule A to the Complaint [Docket 63], who operate fully interactive, e-commerce stores under the seller aliases identified in Schedule A (collectively, the “Seller Aliases”) and attached hereto.

The Court 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 consumers in the State of 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. 8-1, Ex. 1 to the Complaint, which includes the four (4) copyrights associated with the Plaintiff's Copyrights).

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("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 Temporary Restraining Order 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 copyrights, (2) Defendants make, use, offer for sale, sell, and/or import into the United States for subsequent sale or use knock-off products that infringe directly and/or indirectly the 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. As such, this Court orders that

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be 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 Defendants' 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. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.

2. 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 Defendant's

Online Marketplaces, such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), and Dhgate (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating 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, 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.

3. Upon PLAINTIFF's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 2, shall within ten (10) business 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's Copyrights.

4. Defendants shall be restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

5. Any Third-Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within ten (10) business 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, the e-mail addresses identified in Exhibits, 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 ordered by this Court.

6. Plaintiff is authorized to issue expedited written discovery, 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, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

7. 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.

8. Plaintiff is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

9. Plaintiff may provide notice of these proceedings 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 <https://blointernetenforcement.com/>, and by sending an e-mail to the e-mail addresses identified in Exhibits and any e-mail addresses provided for Defendants by third parties that includes a link to said website. 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.

10. Plaintiff has deposited with the Court ten thousand dollars (\$10,000.00), on May 13, 2024 Docket 24, as surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of wrongful restraint hereunder.

11. 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 Northern District of Illinois Local Rules.

12. This Preliminary Injunction without notice is entered on July 3, 2024 and shall remain in effect until Final Disposition of this case or until further order by the Court.

DATED: July 3, 2024

/s/ Martha M. Pacold
Honorable Martha M. Pacold
United States District Judge

Defendant No.	Seller's Name	URL to Storefront
1	Akivide SueJonan	https://www.amazon.com/stores/Akivide/page/BDC81813-6056-4835-B352-9B6EDE07DFA8?ref_ast_bln
2	Bewellan Wuzhens	https://www.amazon.com/sp?ie=UTF8&seller=A2WB7KC7NY8NA7&asin=B0B6VJLSSG&ref_dp_merchant_link
3	Cocoinsity	https://www.amazon.com/sp?ie=UTF8&seller=A1XP0BFNDA5DF7&asin=B099ML8PY4&ref_dp_merchant_linkcocoinsity
4	DIOB huanxingkuajing	https://www.amazon.com/sp?ie=UTF8&seller=A3JQEG5JKQHGS2&asin=B0BXDLMY12&ref_dp_merchant_link
5	Dninmim Shuang.L	https://www.amazon.com/sp?ie=UTF8&seller=AB8BULHV18WM2&isAmazonFulfilled=0&asin=B0C8B6DH1P&ref_olp_merch_name_1
6	DONGCY ZhuangHuangWuZ	https://www.amazon.com/sp?ie=UTF8&seller=A3JQEG5JKQHGS2&asin=B0BXDLMY12&ref_dp_merchant_link
7	ECDAHICC yuchang-e FloHua	https://www.amazon.com/stores/ECDAHICC/page/FAF17E69-3734-47B3-9262-076E27233E3D?ref_ast_bln

8

Defendant No.	Seller's Name	URL to Storefront
23	Grlasen DUBAUEN	https://www.amazon.com/sp?ie=UTF8&seller=A6C6U4EV6USWT&asin=B0957JTK55&ref=dp_merchant_link&isAmazonFulfilled=1
25	HCJKDU	https://www.amazon.ca/sp?ie=UTF8&seller=ADTDVL2IXEFKH&asin=B0C5WDXJC8&ref=dp_merchant_link
26	HXSZWJJ	https://www.amazon.com/sp?ie=UTF8&seller=A15O3NY3CRTUR3&asin=B09XHJ11GG&ref=dp_merchant_link
27	Jahrioiu YYbnjlm	https://www.amazon.com/sp?ie=UTF8&seller=A1TNOX4W7YEKAI&asin=B0BZVM92RP&ref=dp_merchant_link
28	Lewey LEWISH	https://www.amazon.com/sp?ie=UTF8&seller=A2LF9L489Z7WH5&asin=B0CNH9BTBX&ref=dp_merchant_link
29	LOMDEM fantasone	https://www.amazon.com/sp?ie=UTF8&seller=A1NMJHZUHYG5PN&asin=B0C24VZXKN&ref=dp_merchant_link
30	Lsydnfow Captain Direct MFJESEAA	https://www.amazon.com/stores/Lsydnfow/page/B05E6CA9-4E8C-44AB-95EB-EFE1B554DF8C?ref=ast_bln
31	MFJESEAA 【Fast Delivery Only 7-10 Days】	https://www.amazon.com/sp?ie=UTF8&seller=AGGWHR6H6A099&asin=B0C2QJPRY7&ref=dp_merchant_link
32	NP taianxianhongxiufuzhuangdian	https://www.amazon.com/sp?ie=UTF8&seller=A2G8U488GPZJL9&asin=B09TKJRPKN&ref=dp_merchant_link
34	OBEEII	https://www.amazon.com/sp?ie=UTF8&seller=A3ISS7P3JCH2S1&asin=B0CQO5SMN3&ref=dp_merchant_link
35	Onsoyours Sungood Fashion	https://www.amazon.de/sp?language=en&ie=UTF8&seller=A2YB4RNKUR5AEZ&asin=B09TFF66S7&ref=dp_merchant_link
38	SCOMIN taiandejukejiyouxiang	https://www.amazon.com/sp?ie=UTF8&seller=A1HEYD2UQ1IPTL&asin=B0BPRVRK3K&ref=dp_merchant_link
39	SIUBICH anruioo	https://www.amazon.com/sp?ie=UTF8&seller=A3DBQZSFA9OUOV&asin=B0BTVZLZP2&ref=dp_merchant_link
40	Slakkenreis Slakkenreis-Spring Deals 7-20 Days Delivery	https://www.amazon.com/sp?ie=UTF8&seller=A1PSOPNSRWQ3WM&asin=B0CP3WZ14B&ref=dp_merchant_link
42	SNKSDGM LUOGENLI	https://www.amazon.com/sp?ie=UTF8&seller=A17BIM9Q59P4MV&asin=B0B96Y897H&ref=dp_merchant_link
43	Sorrica C.X Trendy (Sorrica)	https://www.amazon.com/sp?ie=UTF8&seller=A1X42B68B4C52W&asin=B09Q8C34X6&ref=dp_merchant_link
45	Useagrey	https://www.amazon.com/sp?ie=UTF8&seller=A2D3ULWFD2JM3&asin=B0CJXSDBP5&ref=dp_merchant_link

Defendant No.	Seller's Name	URL to Storefront
46	ZHIDUOXING zheng zhou mi lao shang mao you xian gong si	https://www.amazon.com/sp?ie=UTF8&seller=A1TEO919I7YMHF&asin=B09WRD4FT2&ref=dp_merchant_link
47	Grlasen <u>DUBAUE</u>	https://www.amazon.com/sp?ie=UTF8&seller=A6C6U4EV6USWT&asin=B0957JT66V&ref=dp_merchant_link&isAmazonFulfilled=1
48	HUITKMM	https://www.amazon.com/sp?ie=UTF8&seller=A1QMYUAB1IF35J&asin=B0CQFZH4WP&ref=dp_merchant_link
55	ColorYan guangzhoushiwushengpijuyou xiangongsi	https://www.amazon.co.uk/sp?ie=UTF8&seller=A3AB5H5TFN4182&asin=B0B6YVMHCT&ref=dp_merchant_link
59	eczipvz eczipvz warehouse clearance	https://www.amazon.com/stores/eczipvz/page/7978DA2C-8DE6-4DE7-AEEF-6FA4C2108980?ref=ast_bln
60	FABROX shileduoshengwuk	https://www.amazon.com/sp?ie=UTF8&seller=A3SR2VO9HJGBR7&asin=B0C9PY57MK&ref=dp_merchant_link
62	GDDXLM	https://www.amazon.com/sp?ie=UTF8&seller=AN11QXP8EMOJ1&asin=B0BZSCFX6R&ref=dp_merchant_link
65	Generic GGMYYS	https://www.amazon.com/sp?ie=UTF8&seller=AUI6MKPG1602F&asin=B0BTBWZGYD&ref=dp_merchant_link
66	Generic Goddess Accent → 15-18 Days Delivery →	https://www.amazon.com/sp?ie=UTF8&seller=ADKDYVS4OBFNR&asin=B0CNKMR8MR&ref=dp_merchant_link
67	Generic Loyalt	https://www.amazon.com/sp?ie=UTF8&seller=A5YMV293A174&asin=B0BY28JDFL&ref=dp_merchant_link
68	GREEVC SPLENDID SHINE	https://www.amazon.com/sp?ie=UTF8&seller=A1OAR100VVDB7V&asin=B0CMTBVXBD&ref=dp_merchant_link
77	NBXNZWF	https://www.amazon.com/sp?ie=UTF8&seller=A1F1XIGXKS92U0&asin=B0C3H7HVNMM&ref=dp_merchant_link
78	Oudemi Danswen	https://www.amazon.com/sp?ie=UTF8&seller=A1SV2HCRGTNI7J&asin=B0BMGN6FS9&ref=dp_merchant_link&isAmazonFulfilled=1
79	PLENTOP MIKINGTOP	https://www.amazon.com/sp?ie=UTF8&seller=A1MGVBWLGTUMET&asin=B0C3X79PLS&ref=dp_merchant_link
80	RCJOLLZ 高新区岭川商贸部	https://www.amazon.se/sp?language=en&ie=UTF8&seller=A3HDAIT287QD45&asin=B09X2ZSFJW&ref=dp_merchant_link
81	Ruixinxue huixin Fashion	https://www.amazon.com/sp?ie=UTF8&seller=A3H3NZLLQ70ODG&asin=B0CCYGXJS6&ref=dp_merchant_link

Defendant No.	Seller's Name	URL to Storefront
83	SHOWONSKY	https://www.amazon.com/sp?ie=UTF8&seller=A1C0WW2TRBO93H&asin=B0CHJHMKJX&ref=dp_merchant_link
85	STKOOBQ Smilvy	https://www.amazon.com/sp?ie=UTF8&seller=ABL2B3HZBDRGA&asin=B0BT8J965H&ref=dp_merchant_link
87	Useagrey	https://www.amazon.com/sp?ie=UTF8&seller=A2D3ULWFD2JM3&asin=B0CJXSDBP5&ref=dp_merchant_link
89	VSERETLOON lingliufushijingpindian	https://www.amazon.com/sp?ie=UTF8&seller=A1LOKXJ7HRZE5D&asin=B0CF2WN1YK&ref=dp_merchant_link
90	WjiNDFG JSWSTORE (Fast logistics / 7-14 day delivery)	https://www.amazon.com/sp?ie=UTF8&seller=A22S1QAM7WV971&asin=B0CPHPCXM4&ref=dp_merchant_link
94	Bebiuлло bebiullo-Apparel	https://www.amazon.com/sp?ie=UTF8&seller=A3IP4LBRA1QBL0&asin=B0BVHX6N95&ref=dp_merchant_link
95	Beverly Store Etily	https://www.amazon.com/sp?ie=UTF8&seller=A12HMN9RBHO7D5&asin=B09SCW5928&ref=dp_merchant_link&isAmazonFulfilled=1
98	CDZL shihongrong shop shihongrong	https://www.amazon.com/sp?ie=UTF8&seller=A1WT7FS77YP1MX&asin=B0BYMKF6GY&ref=dp_merchant_link
99	DUOBEY ZJDDDDJQZ-US	https://www.amazon.com/sp?ie=UTF8&seller=A2A8VBINQ7ILFC&asin=B0CBNS7P2J&ref=dp_merchant_link
100	ENOPINK fabuloud	https://www.amazon.com/sp?ie=UTF8&seller=A39CJM4OKG0B0Y&asin=B0BG47G8LF&ref=dp_merchant_link
101	Generic bgtlik	https://www.amazon.com/sp?ie=UTF8&seller=APC5D8KE8UR3I&asin=B0B5JW86VH&ref=dp_merchant_link
106	JUNGE JUNGE(7-20 days delivery)	https://www.amazon.com/sp?ie=UTF8&seller=AG6E7L9ELBCMQ&asin=B09XVKT69Z&ref=dp_merchant_link
108	Lcyhony lcyhony 2023 Black Friday Deals-7-20 Days Delivery	https://www.amazon.com/sp?ie=UTF8&seller=A2BXG55JYQUGX8&asin=B0BMP5FCN2&ref=dp_merchant_link
111	MOBCTG Lightning Deals Of Today	

Defendant No.	Seller's Name	URL to Storefront
116	Pretifulce Xiart-5-15 Days Standard Shipping	https://www.amazon.com/sp?ie=UTF8&seller=A2HA4DSN3U3P0V&asin=B0B59CFNYY&ref_=dp_merchant_link
117	Qiribati Guohe Store	https://www.amazon.de/sp?language=en&ie=UTF8&seller=A2X4GGWAMAWYY&asin=B09XV1BDFW&ref_=dp_merchant_link
118	RYTEJFES-Store Piobiou52 Versand 7-15 Tage	https://www.amazon.de/sp?language=en&ie=UTF8&seller=A1LD7EC4CFYZE1&asin=B0BVBHJ86J&ref_=dp_merchant_link
122	TIAFORD MyLifeGetingbest	https://www.amazon.com/sp?ie=UTF8&seller=A3RLN2SCP6AJHW&asin=B0CF3ZFKQ2&ref_=dp_merchant_link
123	TRENIS Wenmuriyongpinbaihuo	https://www.amazon.com/sp?ie=UTF8&seller=A2G5FDR7ZDZ8PL&asin=B0C5QFTQDS&ref_=dp_merchant_link
127	ViYW Kexdaaf	https://www.amazon.com/sp?ie=UTF8&seller=A8QH02NJ5NLW9&asin=B0CPFL1JB4&ref_=dp_merchant_link
131	Generic fengjunhao	https://www.amazon.com/sp?ie=UTF8&seller=A3KQIG4KQ21X0D&asin=B0C3XLSMNR&ref_=dp_merchant_link
139	LishengXX	https://www.amazon.ca/sp?ie=UTF8&seller=A3QX8TT53NYVIU&asin=B0BZTXFFNJ&ref_=dp_merchant_link

**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.: 1:24-cv-01652-JCD-KLHH

Honorable Jeremy C. Daniel

Magistrate Keri L. Holleb Hotling

**ORDER FOR
PRELIMINARY INJUNCTION**

Hearing: June 4, 2024, at 9:30 a.m.

ORDER FOR PRELIMINARY INJUNCTION

THIS CAUSE being before the Court on Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, ("Plaintiff") Motion for Entry of Preliminary Injunction ("Motion") and this Court having heard the evidence before it hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against those numbered defendants identified in Schedule A to the Complaint, who operate fully interactive, e-commerce stores under the seller aliases identified in Schedule A (collectively, the "Seller Aliases").

The Court 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 consumers in the State of 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. 5-1, Ex. 1 to the Complaint, which includes the fifteen (15) copyrights associated with the Plaintiff's Copyrights).

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("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 Temporary Restraining Order 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 copyrights, (2) Defendants make, use, offer for sale, sell, and/or import into the United States for subsequent sale or use knock-off products that infringe directly and/or indirectly the 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. As such, this Court orders that

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be 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 Defendants' 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. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.

2. 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 Defendant's Online Marketplaces, such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd.

("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), and Dhgate, Walmart.com (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating 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, 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.

3. Upon PLAINTIFF's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 2, shall within ten (10) business 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's Copyrights.

4. Defendants shall be restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

5. Any Third-Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within ten (10) business 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, the e-mail addresses identified in Exhibits, 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 ordered by this Court.

6. Plaintiff is authorized to issue expedited written discovery, 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, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

7. 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.

8. Plaintiff is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

9. Plaintiff may provide notice of these proceedings to Defendants, including notice of the preliminary injunction hearing, service of process pursuant to Fed. R. Civ. P. 4(f)(3), and

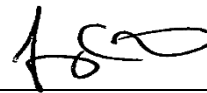
any future motions by electronically publishing a link to the Complaint, this Order and other relevant documents on a website <https://blointernetenforcement.com/>, and by sending an e-mail to the e-mail addresses identified in Exhibits and any e-mail addresses provided for Defendants by third parties that includes a link to said website. 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.

10. Plaintiff has deposited with the Court five thousand dollars (\$5,000.00), on May 23, 2024 Docket 21, as surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of wrongful restraint hereunder.

11. 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 Northern District of Illinois Local Rules.

12. This Preliminary Injunction without notice is entered at 11:00 a.m. on June 4, 2024, and shall remain in effect until Final Disposition of this case or until further order by the Court.

DATED: June 4, 2024



Honorable Jeremy C. Daniel
United States District Judge