

**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-03067-ARW-DPM

Honorable Andrea R. Wood

Magistrate Daniel P. McLaughlin

**PLAINTIFF’S FIRST MOTION TO EXTEND
THE TEMPORARY RESTRAINING ORDER**

Plaintiff Hong Kong Leyuzhen Technology Co., Ltd., (“Plaintiff”), by and through its counsel, the Bayramoglu Law Offices, LLC, submits this motion to extend the Temporary Restraining Order entered by this Court on April 25, 2025 [Dkt. 17], which is set to expire on May 9, 2025, for an additional period of fourteen (14) days up to and including May 23, 2025. This is Plaintiff’s first motion to extend the TRO. Plaintiff’s motion to extend is made and based upon the memorandum in support the motion, the Declaration of Joseph W. Droter (the “Droter Decl.”), together with any argument of counsel entertained by the Court.

DATED: May 8, 2025

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

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

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 8th 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, Amazon.

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Attorneys for Plaintiff

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

Plaintiff Hong Kong Leyuzhen Technology Co., Ltd., (“Plaintiff”), by and through its counsel, the Bayramoglu Law Offices, LLC, submits this Memorandum in Support of its Motion to Extend Temporary Restraining Order (the “Motion”).

Plaintiff seeks extension of the Temporary Restraining Order (“TRO”) issued by this Court on April 25, 2025 [Dkt. No. 17] to provide the Defendants listed in Schedule “A” time to respond after receiving notice of this lawsuit and respond to the complaint while keeping the status quo. (Droter Decl. ¶ 7.) Absent this additional time, Defendants named Schedule “A” Defendants (the “Defendants”) will not have enough notice to respond prior to the current expiration of the TRO. (*Id.*) This is Plaintiff’s first request for an extension of the TRO. (*Id.* ¶ 4.)

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

This Court and other courts in the Seventh Circuit have found good cause to extend a TRO where service and expedited discovery responses from third-party platforms remain pending. *See H-D Michigan, LLC v. Hellenic Duty Free Shops S.A.*, No. 2:11-CV-00742, 2011 WL 4368418, at *1 (E.D. Wis. Sept. 19, 2011) (the court granted motion to extend temporary restraining order to effectuate service); *loanDepot.com, LLC v. Schneider*, 647 F. Supp. 3d 620, 627 (N.D. Ill. 2022) (granting extensions of temporary restraining order for expedited discovery).

In this case, Plaintiff has worked diligently to serve the TRO and the associated subpoena on the Platform, Amazon. (Droter Decl. ¶ 5.) Plaintiff also has out for personal service on the Platform’s U.S. entity, Amazon.com at its Registered Agent, as well as has emailed these materials to the Platform’s designated TRO response email tro-notices@amazon.com on April 29, 2025. (*Id.*) The Platform acknowledged receipt of the TRO and associated subpoena on April 30, 2025, and was able to provide the Defendants contact information on May 5, 2025, which then allowed Plaintiff to effectuate service. (*Id.* ¶ 6)

An extension of the TRO is necessary so that Plaintiff can provide Defendants enough time to respond to the complaint and TRO, as well as notice of Plaintiff’s anticipated motion to enter preliminary injunction. (*Id.* ¶ 7.) Moreover, absent an extension of the TRO, Plaintiff is exposed to immediate and continuing irreparable harm because Defendants will likely learn of these proceedings, abandon their storefronts on third-party platforms, transfer their assets to offshore accounts outside of the jurisdiction of this Court, and frustrate Plaintiff’s ability to obtain its requested relief. (*Id.*) Furthermore, these circumstances demonstrate “good cause” for the requested 14-day extension under Federal Rule of Civil Procedure 65(b). (*Id.*). For the foregoing reasons, Plaintiff respectfully requests that the TRO [Dkt. No. 17] be extended for a period of fourteen (14) days up to and including May 23, 2025.

CONCLUSION

Based on the foregoing, Plaintiff respectfully requests that the TRO be extended for a period of fourteen (14) days up to and including May 23, 2025, together with any additional relief the Court deems just and appropriate.

DATED: May 8, 2025

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

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Magistrate Daniel P. McLaughlin

**DECLARATION OF JOSEPH W. DROTER, ESQ. IN SUPPORT OF PLAINTIFF'S
FIRST MOTION TO EXTEND TEMPORARY RESTRAINING ORDER**

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 First Motion to Extend Temporary Restraining Order.

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., Ltd. ("Plaintiff"). I make this declaration from my matters within my own knowledge unless stated otherwise.

4. The Court granted Plaintiff's renewed motion for TRO and issued a signed TRO on April 25, 2025 [Dkt. No. 17] for a period of fourteen (14) days which is set to expire on May 9, 2025. This is Plaintiff's first request for an extension of the TRO.

5. Since entry of the TRO, Plaintiff worked diligently to effectuate service and gain compliance by the designated third-party platform, Amazon (the "Platform"). This includes, among other things, serving the Platform via email with the TRO and the related subpoena at Amazon's TRO email address, tro-notices@amazon.com. Personal service was also out to Amazon's U.S. Registered Agent.

6. The Platform acknowledged receipt of the TRO and the associated subpoena via email on April 30, 2025, and was able to provide the Defendants contact information on May 5, 2025. Plaintiff then effectuated service on Defendants the same day, May 5, 2025.

7. Without an extension of the TRO so that the Defendants listed in Schedule "A" have time to respond after receiving notice of this lawsuit and respond to the complaint while keeping the status quo. Absent this additional time, Defendants named Schedule "A" Defendants (the "Defendants") will not have enough notice to respond prior to the current expiration of the TRO as well as Plaintiff's anticipated motion for preliminary injunction. Moreover, these circumstances justify "good cause" for extending the TRO under Federal Rule of Civil Procedure 65(b).

8. For these reasons and those stated in Plaintiff's Memorandum in Support of the Motion for TRO [Dkt. No. 14-01], there is a high probability that Plaintiff will suffer immediate and irreparable injury, loss, or damage if the TRO is not extended.

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

Executed on May 8, 2025, in Chicago, Illinois.

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

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