

**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 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. 18], 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 6, 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

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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 6th 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.

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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 *Ex Parte* Motion to Extend Temporary Restraining Order (the “Motion”).

I. INTRODUCTION

Plaintiff seeks extension of the Temporary Restraining Order (“TRO”) issued by this Court on April 25, 2025 [Dkt. 18] to provide the third-party platform, Alibaba (the “Platform”) time to respond to Plaintiff’s expedited discovery requests. In this regard, Plaintiff has served the Platform with the TRO and the associated subpoena. To date, the Platform only acknowledged receipt of the TRO and the subpoena as of today, May 6, 2025, and requested an additional fee to proceed with the process of compiling the information. The Alibaba platform has not complied with their requirements, which includes providing email address for the named Schedule “A” Defendants so that electronic service can be effectuated on them.

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. This Court and other courts in the Seventh Circuit have found good cause to extend a TRO where expedited discovery responses from third-party platforms remain pending. This is Plaintiff's first request for an extension of the TRO.

Plaintiff has worked diligently to subpoena the Alibaba Platform. The Alibaba Platform was electronically served at ipr-ustro@service.alibaba.com, and personal service is being sent out to Alibaba's U.S. Registered Agent. Plaintiff was also required submit Excel sheets with Schedule A information arranged in a particular fashion prior to the Platform beginning compliance with the TRO and subpoena. As mentioned earlier, the Platform has not complied with the TRO and the subpoena's requirements, which includes providing email address for the named Schedule "A" Defendants so that electronic service can be effectuated on them. Without an extension of the TRO, the possibility of harm to Plaintiff remains significant because defendants will 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 the purpose of the law and Plaintiff's ability to obtain its requested relief. For these reasons, Plaintiff seeks extension of the TRO for an additional period of fourteen (14) days up to and including May 23, 2025.

II. PROCEDURAL HISTORY

The Court granted Plaintiff's motion and issued the TRO on April 25, 2025 [Dkt. 18] for a period of fourteen (14) days which is set to expire on May 9, 2025. Plaintiff has effectuated service on the Platform via email. (Droter Decl. at ¶ 5.) To date, the Platform has not complied with either the TRO or the subpoena, which includes providing email addresses for the named Schedule "A" Defendants so that electronic service can be effectuated on them. (*Id.*)

III. ARGUMENT

Pursuant to Fed. R. Civ. P. 65(b)(2), a temporary restraining order entered without notice expires fourteen (14) days after entry unless the Court finds good cause to extend the TRO prior to its expiration. Courts in the Seventh Circuit have found good cause to extend the TRO where Plaintiff's efforts to effectuate service and procure expedited discovery responses 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).

Plaintiff respectfully submits that there is good cause to extend the TRO in the instant case because the third-party Platform has yet to comply with the TRO. (Droter Decl. ¶ 5.) Further, without the TRO in place, there is a high probability that the Defendants will learn of these proceedings, close their seller accounts, and transfer their assets to offshore bank accounts outside of the jurisdiction of this Court. (Droter Decl. ¶ 6.) As discussed in Plaintiff's Memorandum in Support of its *Ex Parte* Motion for Entry of a Temporary Restraining Order [Dkt. No. 15-01], and as found by the Court in granting the TRO, the possibility of irreparable harm to Plaintiff is and remains significant. (*Id.* ¶ 7.) Accordingly, in the interest of justice and for good cause shown, Plaintiff respectfully submits that extension of the TRO remains necessary to prevent harm to Plaintiff.

IV. 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 6, 2025

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

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Attorneys for Plaintiff

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Magistrate Keri L. Holleb Hotaling

**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 Motion for Temporary Restraining Order (“TRO”) and issued a signed TRO on April 25, 2025 [Dkt. No. 18] 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 has been working diligently to effectuate service and gain compliance by the designated third-party platform, Alibaba (the “Platform”). This includes, among other things, serving the Platform via email with the TRO and the related subpoena at ipr-ustro@service.alibaba.com. Personal service is also beings sent to Alibaba’s U.S. Registered Agent. Plaintiff was also required to submit Excel sheets with Schedule A information arranged in a particular fashion prior to the Platform beginning compliance with the TRO and subpoena. To date, the Platform recently acknowledged receipt of the TRO and the subpoena, today, May 6, 2025, and has not complied with their requirements, which includes providing email addresses for the named Schedule “A” Defendants so that electronic service can be effectuated on them.

6. Without extension of TRO to allow the Platform time to comply with the TRO and the subpoena, there is a high probability that the Defendants will learn of these proceedings, close their seller accounts, and transfer their assets to offshore bank accounts outside of the jurisdiction of this Court.

7. For these reasons and those stated in Plaintiff’s Memorandum in Support of the Motion for TRO [Dkt. No. 15-1], 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 6, 2025, in Chicago, Illinois.

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

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