

**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-06122-VMK-LKM

Honorable Virginia M. Kendall

Magistrate Laura K. McNally

TEMPORARY RESTRAINING ORDER

Plaintiff Hong Kong Leyuzhen Technology Co. Limited, (“PLAINTIFF”) filed a Motion for Entry of a Temporary Restraining Order and Other Relief (the “Motion”) against the fully interactive, e-commerce stores¹ operating under the domain names on TikTok Shop identified in Schedule A to the Complaint and attached hereto (collectively, “Defendants”) and using at least the online marketplace accounts identified in Schedule A (the “Online Marketplaces”). After reviewing the Motion and the accompanying record, this Court GRANTS PLAINTIFF’s Motion as follows:

The Court finds, 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

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

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 competing 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. 2-1, Exhibit 1 to the Complaint, which includes the federally registered copyrights (1) VA0002379934, (2) VA0002381840, (3) VA0002381842, (4) VA0002382152, (5) VA0002382270, (6) VA0002413192, (7) VA0002413194, (8) VA0002413196, (9) VA0002413197, (10) VA0002413200, (11) VA0002413202, (12) VA0002415185, associated with the Plaintiff's Copyrights).

In this case, PLAINTIFF has presented screenshot evidence that each Defendant's e-commerce store on TikTok 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. [2-3] Exhibit 3 to the Complaint, which includes screenshot evidence and internet link confirming that each 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 Defendants on their 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 Defendants in this case because there is credible evidence to conclude they are 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 Katie M. Kuhn in support of the Motion and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. Specifically, in the absence of an *ex parte* Order, Defendants could and likely would move any assets from accounts in financial institutions under this Court's jurisdiction to offshore accounts. Accordingly, this Court Orders as follows:

1. Defendants, their officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be temporarily enjoined and restrained from:
 - 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. PLAINTIFF is authorized to issue expedited written discovery to Defendants, pursuant to Federal Rules of Civil Procedure 33, 34, 36, and 45 related to:

- a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;
- b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and
- c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other

financial institutions, including, without limitation, Temu.com, PayPal Inc. (“PayPal”), Alipay, ContextLogic Inc. d/b/a Wish.com (“Wish.com”), Alibaba Group Holding Ltd. (“Alibaba”), Ant Financial Services Group (“Ant Financial”), Amazon Pay, Afterpay, Klarna, TikTok 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., 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, TikTok 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 any of the Defendants, or in connection with any of Defendants’ Online Marketplaces, including, without limitation, any online marketplace platforms such as TokTik Temu, eBay Inc., AliExpress, Alibaba, Amazon.com Inc., Wish.com, and Dhgate (collectively the “Third Party Providers”), shall, within seven (7) calendar days after receipt of such notice, provide to PLAINTIFF expedited discovery, limited to copies of documents and records in such person’s or entity’s possession or control sufficient to determine:

- a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and
 - c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Alipay, Wish.com, Alibaba, Ant Financial, Amazon Pay, or other merchant account providers, payment providers, third party processors, credit card associations (e.g., MasterCard and VISA), including present balances on any accounts.
4. 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 Defendants in connection with the sale of counterfeit 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 Defendants' seller aliases, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, 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 order by this Court.

7. PLAINTIFF may provide notice of the proceedings in this case to Defendants, including notice of the preliminary injunction hearing, service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order, and other relevant documents on a website and by sending an e-mail to any e-mail addresses provided for Defendants by third parties. The Clerk of the Court is directed to issue a single original summons in the name of "THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE A" that shall apply to all Defendants. The combination of providing notice via

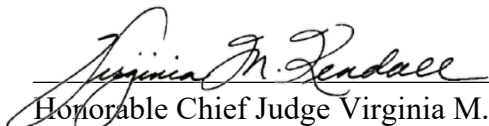
electronic publication and e-mail, along with any notice that Defendants receive from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.

8. PLAINTIFF must provide notice to Defendants 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 \$5,000.00, 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. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and the Northern District of Illinois Local Rules. Any third party impacted by this Order may move for appropriate relief.

This Temporary Restraining Order without notice is entered at 12:30 P.M. on this 12th day of June, 2025 and shall remain in effect for fourteen (14) calendar days.


Honorable Chief Judge Virginia M. Kendall
United States District Judge

Defendant No.	Seller's Name	Link to Seller's Website
VA0002381840		
1	Fashion Casual Woman	https://www.tiktok.com/view/product/1729571277676909065
2	FOXCLAW Curve	https://www.tiktok.com/view/product/1729499178940600663
3	Huaensi Clothing	https://www.tiktok.com/view/product/1729490871889465412
VA0002379934		
4	Wosijie	https://www.tiktok.com/view/product/1729478892751589732
5	SeedSunSoil	https://www.tiktok.com/view/product/1729727862130577994
6	Shirt & Co	https://www.tiktok.com/view/product/1729732052120605078
7	DENJIALIANGSHOP	https://www.tiktok.com/view/product/1729569426130440628
8	Fruitbuy	https://www.tiktok.com/view/product/1729570814060892994
VA0002382152		
9	YIRUICY	https://www.tiktok.com/view/product/1729408918103102354
10	ZIBUYU	https://www.tiktok.com/view/product/1729432774378033776
VA0002382270		
11	LILYTREE	https://www.tiktok.com/view/product/1729435221391216922
VA0002413192		
12	Slim Diva	https://www.tiktok.com/view/product/1729563742671835842
VA0002413194		
13	Wardrobe2	https://www.tiktok.com/view/product/1729489681739714781
14	Robo01173	https://www.tiktok.com/view/product/1729732103145165739
15	CHAOLILAI	https://www.tiktok.com/view/product/1729693768955827021
16	QmuGlan66	https://www.tiktok.com/view/product/1729688828409253938
17	The Wheatsheaf	https://www.tiktok.com/view/product/1729437625933009664
18	LILI.AN.SHOP	https://www.tiktok.com/view/product/1729619849868841616
19	Jemishi	https://www.tiktok.com/view/product/1729648489293451532
20	Lmei	https://www.tiktok.com/view/product/1729698549542261104
VA0002413196		
21	Ahn'Qiraj	https://www.tiktok.com/view/product/1729418440116048215
22	Foxtail	https://www.tiktok.com/view/product/1729701129032929611
VA0002413197		
23	Qanyas	https://www.tiktok.com/view/product/1729562275773321829
24	Seduction Aisle	https://www.tiktok.com/view/product/1729726270417638350
25	ABLE FASHION	https://www.tiktok.com/view/product/1729483086809894974
VA0002413200		
26	Wanrui Apparel	https://www.tiktok.com/view/product/1729546803417026929
VA0002415182		
27	Magic City	https://www.tiktok.com/view/product/1729540491583328505
VA0002415185		
28	NyfairyBrand	https://www.tiktok.com/view/product/1729601875661787816