

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED, a Chinese Corporation

Plaintiff,

v.

Choove,

Defendant.

Case No. 1:25-cv-06290-FUV-AB

**SECOND AMENDED COMPLAINT
FOR COPYRIGHT INFRINGEMENT**

JURY TRIAL DEMANDED

Honorable Franklin U. Valderrama

Magistrate Albert Berry, III

Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, (“Plaintiff”), by and through its counsel, the Bayramoglu Law Offices, LLC, submits the following Complaint against Choove, (“Defendant”) and hereby alleges as follows:

NATURE OF THE ACTION

1. Plaintiff is the owner of all rights, title and interest in and to the copyright registrations issued by the United States Copyright Office for certain images related to its Rotita Brand product line (the “Rotita”) used in connection with the promotion and sale of women’s apparel, which bear the United States registration group number VA0002381842 (the “Copyright Protected Images”).

2. Plaintiff has filed this action to combat the online copyright infringer, Choove, who trades upon Plaintiff’s reputation, goodwill and valuable copyrights, including the Copyright Protected Images, to sell competing products of inferior quality by representing them to be authentic Rotita products through the unauthorized display of the Copyright Protected Images on

its online storefront (the “Online Stores”) maintained on the TikTok Shop sales platform (the “Online Platform”). Specifically, Defendant is infringing Plaintiff’s Federally registered copyright, displaying an article of clothing commonly referred to as a jumpsuit. Plaintiff sells these articles of clothing through its website Rotita.com, which allows consumers to purchase the genuine products through the Rotita website. Defendant additionally offers its competing products at substantially reduced prices from the authentic Rotita products offered by Plaintiff.

3. Plaintiff exclusively utilizes the Copyright Protected Images in connection with the advertising, display, and sale of its authentic Rotita products on its wholly owned, operated, and controlled company website. Plaintiff does not advertise, market, display, or sell its authentic products on the Online TikTok Shop Platform.

4. Defendant likewise advertises, markets, and/or sells its competing products embodying Plaintiff’s Copyright Protected Images by reference to the same photographs and 3-D artwork as associated with genuine Rotita products, which causes further confusion and deception in the marketplace. Attached hereto as **Exhibit 2** are the true and correct images infringed by Defendant and the Defendant’s storefront next to the federally registered images of Plaintiff, which display the Plaintiff’s Copyright Protected Image of the jumpsuit, with the exact or similar pose, color arrangements, model, accessories and other copyright protected features.

5. Plaintiff is forced to file this action to combat Defendant’s unauthorized use of its Copyright Protected Images to sell inferior, competing products, as well as to protect unknowing consumers from purchasing competing products over the Internet. Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, and tarnishment of the Rotita reputation and goodwill because of Defendant’s actions, and therefore the company seeks injunctive and monetary relief.

JURISDICTION AND VENUE

6. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Copyright Act, 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)–(b) and 28 U.S.C. § 1331.

7. This Court has jurisdiction over the unfair deceptive trade practices claim in this action that arise under the laws of the State of Illinois pursuant to 28 U.S.C. § 1367(a) because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

8. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendant, since the Defendant directly targets consumers in the United States, including those within the State of Illinois, through at least the fully interactive commercial internet stores accessible through Defendant’s Online Stores located on TikTok Shop.

9. Specifically, Defendant is reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores through which residents can purchase inferior products that are advertised for sale using, without authorization, Plaintiff’s Copyright Protected Images. The Defendant has targeted sales from Illinois residents by operating online stores that offer shipping to the United States, including to the State of Illinois, accept payment in United States currency, and, on information and belief, has used Plaintiff’s Copyright Protected Images, without authorization, to sell competing products of lesser quality to residents of the State of Illinois.

10. The Defendant is committing tortious acts in the State of Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois.

Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b)(2) and 1400(a) because Defendant has committed acts of copyright infringement in this judicial district and do substantial business in the judicial district.

THE PARTIES

11. Plaintiff Hong Kong Leyuzhen Technology Co. Limited is a corporation organized under the laws of the People's Republic of China ("China") and is the owner of the Copyright Protected Images asserted to have been infringed in this action by the Defendant. Attached hereto as **Exhibit 1** is the true and correct copy of the federal copyright group registration issued for the Copyright Protected Images.

12. Plaintiff founded its Rotita Brand in 2009, which is dedicated to women's fashion apparel and serves consumers in the United States and throughout the world.

13. Between 2022 and 2023, Plaintiff designed, caused to subsist in material form, and first published the Copyright Protected Images on its website located at the company's designated website employing the Rotita Brand in its URL and over the years has worked hard to establish success and recognition for high quality women's apparel internationally and in the United States.

14. Plaintiff has expended substantial time, money, and other resources in developing, advertising, and otherwise promoting its Rotita Brand and, specifically, the Copyright Protected Images. As a result, Rotita is widely recognized and exclusively associated by consumers, the public, and the trade as being quality products.

15. Plaintiff owns all rights, including without limitation, the rights to reproduce the Copyright Protected Images in copies, to prepare derivative works based upon the copyrighted works, and to distribute copies of the copyrighted works to the public by sale or other transfer of ownership, or by rental, lease, or lending, the protected works.

16. Plaintiff has neither licensed nor authorized Defendant to use the Copyright Protected Images and the Defendant is not an authorized retailer of Plaintiff's genuine products. Defendant is an individual and business entity who, upon belief, resides mainly in the China or Hong Kong. Defendant conducts business throughout the United States, including within the State of Illinois and in this judicial district, through the operation of Defendant's Online Stores on TikTok Shop and has offered to sell and, has sold and continues to sell on this link <https://www.tiktok.com/view/product/1729590698263548384>, competing products to consumers within the United States, including in the State of Illinois and in this judicial district, by displaying, without authorization, the Copyright Protected Images on its Online Stores.

17. As discovered through Plaintiff's other copyright infringement enforcement actions commenced in this judicial district, Defendant's sales operations utilize textile manufacturing sources, which provide identical, reproduction fabrics and patterns employed in the authentic Rotita products offered by Plaintiff and employ the same distribution networks to fulfill retail orders for its competing, inferior products.

18. In addition, Defendant goes to great lengths to conceal its identity and the full scope of its operations making it virtually impossible for Plaintiff to learn Defendant's true identities and the exact interworking of its network. Interposing the third-party social media platform TikTok creates additional ambiguity as this platform is a content sharing platform first and e-commerce platform second, which results in TikTok having more restricted access to addresses and seller information as their users would likely be individuals with their personal information attached to accounts. This creates an opportunity to veil business entities under additional concealment.

DEFENDANTS' UNLAWFUL CONDUCT

19. The success of Plaintiff has resulted in competition, counterfeiting and intentional copying of the company's products, and the sale and offering for sale of said products through the unauthorized use of the Copyright Protected Images. Upon information and belief, Defendant conducts its illegal operations through its Online Stores maintained on the Online TikTok Shop Platform. Defendant targets consumers in the United States, including in the State of Illinois, and sells and offers for sale competing products through the unauthorized use of the Copyright Protected Images.

20. Upon information and belief, and at all times relevant hereto, Defendant has had full knowledge of Plaintiff's ownership of the Copyright Protected Images, including its exclusive right to use and license belonging to Rotita and the goodwill associated therewith.

21. Plaintiff has identified numerous stores on the Online Platform, including Defendant's Online Stores, which is offering for sale, selling, and exporting competing products to consumers in this judicial district and throughout the United States by using, without authorization, the Copyright Protected Images. Infringers on e-commerce platforms such as Defendant's Online Stores are estimated to receive tens of millions of visits per year and to generate over \$135 billion in annual online sales. According to an intellectual property rights seizures statistics report issued by the United States Department of Homeland Security, the manufacturer's suggested retail price ("MSRP") of goods seized by the U.S. government in fiscal year 2020 was over \$1.3 billion. Internet websites like Defendant's Online Stores are also estimated to contribute to tens of thousands of lost jobs for legitimate businesses and broader economic damages such as lost tax revenue every year.

22. On information and belief, the Defendant set up at least one seller account on the Online Platform using, without authorization, the Copyright Protected Images so that they appear to unknowing consumers to be authorized online retailers of genuine products. Defendant's Online Stores accept payment in United States currency via credit cards and PayPal.

23. On information and belief, Defendant deceives unknowing consumers by using Plaintiff's Copyright Protected Images on Defendant's Online Stores without authorization to attract customers, and to sell competing products resembling authentic Rotita products.

24. Defendants, in similar types of cases, deceive unknowing consumers by using the infringed intellectual property as originally used in connection with the sale of genuine products, within the content, text, and/or meta tags of their websites to attract various search engines crawling the Internet looking for websites relevant to consumer product searches. Additionally, infringers in similar type cases, use other unauthorized search engine optimization ("SEO") tactics and social media spamming so that the Defendant's internet store listings show up at or near the top of relevant search results and misdirect consumers searching for genuine products. Further, infringers utilize similar illegitimate SEO tactics to propel new domain names to the top of search results after others are shut down.

25. Here, a search for the Rotita women's jumpsuits on the Online Platform resulted in the unauthorized display of the Copyright Protected Images being used to promote competing, inferior products. As such, Plaintiff also seeks to disable Defendant's Online Stores that are how the Defendants display, without authorization, the Copyright Protected Images to continue to sell competing products to consumers in the State of Illinois and in this judicial district.

26. Upon receiving notice of a lawsuit, infringers in similar cases will often register new domain names or online marketplace accounts under new aliases.¹ Infringers also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border Protection. A 2021 U.S. Customs and Border Protection (“CBP”) report on seizure statistics indicated that e-commerce sales accounted for 13.3% of total retail sales with second quarter of 2021 retail e-commerce sales estimated at \$222.5 billion.² In FY 2021, there were 213 million express mail shipments and 94 million international mail shipments. *Id.* Nearly 90 percent of all intellectual property seizures occur in the international mail and express environments. *Id.* at 27. The “overwhelming volume of small packages also makes CBP’s ability to identify and interdict high risk packages difficult.” *Id.* at 23.

27. Further, infringers often operate multiple credit card merchant accounts and third-party accounts behind layers of payment gateways so that they can continue operating despite enforcement efforts. Upon information and belief, Defendant maintains offshore bank accounts and regularly moves funds from its Online Platform accounts to offshore bank accounts outside the jurisdiction of this Court particularly since it is believed that Defendant resides in China or Hong Kong.

28. Defendant’s use of Plaintiff’s Copyright Protected Images in connection with the advertising, marketing, distribution, offering for sale and the sale of competing products of inferior quality is likely to cause and has caused confusion, mistake and deception by and among

¹ <https://www.ice.gov/news/releases/buyers-beware-ice-hsi-and-cbp-boston-warn-consumers-aboutcounterfeit-goods-during> (counterfeiters are “very adept at setting up online stores to lure the public into thinking they are purchasing legitimate good on legitimate websites”) (last visited Apr. 6, 2022).

² U.S. Customs and Border Protection, Intellectual Property Right Seizure Statistics, FY 2021 (<https://www.cbp.gov/sites/default/files/assets/documents/2022-Sep/202994%20-%20FY%202021%20IPR%20Seizure%20Statistics%20BOOK.5%20-%20FINAL%20%28508%29.pdf>) at 23.

consumers and is irreparably harming Rotita. Defendant has manufactured, imported, distributed, offered for sale and sold their inferior products using the Copyright Protected Images without authorization to do so and will continue to do so unless restrained temporarily, preliminarily, and permanently by this Court.

29. Defendant, without authorization or license from Plaintiff, knowingly and willfully used and continues to use the company's Copyright Protected Images in connection with the advertisement, offer for sale and the sale of competing products through, *inter alia*, their Online Stores.

30. Upon information and belief, Defendant will continue to infringe Plaintiff's Copyright Protected Images for the purpose of selling inferior competing products unless preliminarily and permanently enjoined.

31. Defendant's unauthorized use of the Copyright Protected Images in connection with the advertising, distribution, offering for sale, and the sale of poor-quality products in the United States and specifically into the State of Illinois, is likely to cause and has caused confusion, mistake, and deception by and among consumers and is irreparably harming the goodwill and intrinsic value of Plaintiff's Rotita Brand.

32. Unless enjoined, Defendant's infringing conduct will continue to cause irreparable harm to Plaintiff.

COUNT I
COPYRIGHT INFRINGEMENT (17 U.S.C. § 101, et seq.)

33. Plaintiff repeats, realleges and incorporates by reference herein its allegations contained in paragraphs 1 through 32, above.

34. Plaintiff's Copyright Protected Images have significant value and have been produced and created at considerable expense.

35. Plaintiff owns all exclusive rights, including without limitation the rights to reproduce the Copyright Protected Images in copies, to prepare derivative works based upon the copyrighted work, and to distribute copies of the copyrighted work to the public by sale or other transfer of ownership, or by rental, lease, or lending, the copyright protected works.

36. Defendant has sold, offered to sell, marketed, distributed, and advertised, and is still selling, offering to sell, marketing, distributing, and advertising products using the Copyright Protected Images without Plaintiff's permission, authorization, consent, or license.

37. Upon information and belief, Defendant has directly copied the Copyright Protected Images and used them, without authorization, to advertise, promote, offer for sale, and sell competing products of low quality and at a fraction of the price.

38. Defendant's unauthorized exploitation of Copyright Protected Images to advertise, offer for sale and sell inferior products on Defendant's Online Stores constitutes copyright infringement.

39. On information and belief, Defendant's infringing acts were willful, deliberate, and committed with prior notice and knowledge of the Copyright Protected Images.

40. Defendant either knew, or should have reasonably known, that the Copyright Protected Images are subject to federal copyright protection. Further, the Defendant continues to infringe upon Plaintiff's rights in and to the Copyright Protected Images.

41. As a direct and proximate result of its unauthorized and infringing conduct, Defendant has obtained and continues to realize direct and indirect profits and other benefits rightfully belonging to Plaintiff, and that Defendant would not otherwise have realized but for its infringement of Plaintiff's Copyright Protected Images.

42. Accordingly, Plaintiff seek an award of damages pursuant to 17 U.S.C. § 504.

43. In addition to actual damages, Plaintiff is entitled to receive the profits made by Defendant from its wrongful acts, pursuant to 17 U.S.C. § 504(b). Defendant should be required to account for all gains, profits, and advantages derived by Defendant from its acts of infringement.

44. In the alternative, Plaintiff is entitled to, and may elect to choose statutory damages pursuant to 17 U.S.C. § 504(c), which should be enhanced by 17 U.S.C. § 504(c)(2) because of Defendant's willful copyright infringement.

45. Plaintiff is entitled to, and may elect to choose injunctive relief under 17 U.S.C. § 502, enjoining any use or exploitation by Defendant of its infringing work and for an order under 17 U.S.C. § 503 that any of Defendant's infringing products be impounded and destroyed.

46. Plaintiff seeks and is also entitled to recover reasonable attorneys' fees and costs of suit pursuant to 17 U.S.C. § 505.

47. Plaintiff has no adequate remedy at law, and, if Defendant's actions are not enjoined, Plaintiff will continue to suffer irreparable harm to the reputation and goodwill of its well-known Rotita Brand.

48. The conduct of Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured monetarily. As such, Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. §§502 and 503, Plaintiff is entitled to injunctive relief prohibiting the Defendant from further infringing the Copyright Protected Images and ordering that Defendant destroy all unauthorized copies. Defendant's copies, plates, and other embodiments of the copyrighted works from which copies can be reproduced, if any, should be impounded and forfeited to Plaintiff as instruments of

infringement, and all infringing copies created by Defendant should be impounded and forfeited to Plaintiff, under 17 U.S.C §503.

COUNT II
VIOLATION OF ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES ACT
(815 ILCS § 510/1, et seq.)

49. Plaintiff repeats, realleges and incorporates by reference herein its allegations contained in paragraphs 1 through 32, above.

50. Defendant has engaged in acts violating Illinois law including, but not limited to, passing off its competing products as those of Plaintiff's Rotita products through the unauthorized use of the Copyright Protected Images, thereby causing a likelihood of confusion and/or misunderstanding as to the source of its goods, causing a likelihood of confusion and/or misunderstanding as to an affiliation, connection, or association with genuine Rotita Brand products, falsely representing that its products have Plaintiff's approval when they do not, and engaging in other conduct which creates a likelihood of confusion or misunderstanding among the public.

51. Moreover, Defendant has used, without authorization, Plaintiff's Copyright Protected Images in promoting Defendant's Online Stores by displaying them in connection with offering for sale competing, inferior products by deceiving consumers into believing said products are authentic Rotita Brand products.

52. The foregoing acts of Defendant constitutes a willful violation of the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510/1, et seq.

53. Plaintiff is entitled to the recovery of damages and attorneys' fees as authorized by statute.

54. Plaintiff has no adequate remedy at law, and Defendant's conduct has caused Plaintiff to suffer damage to its Rotita Brand's reputation and goodwill. Unless enjoined by the Court, Plaintiff will continue to suffer future irreparable harm as a direct result of Defendant's unlawful activities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

1. That Defendant, its affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:

a. using Plaintiff's Copyright Protected Images or any reproductions, counterfeit copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Rotita product or is not authorized by Plaintiff to be sold in connection with its registered copyrights;

b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Rotita product or any other product produced by Plaintiff by using the Copyright Protected Images to sell and offer for sale such products that are not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff;

c. committing any acts calculated to cause consumers to believe that Defendant's inferior products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff or its Rotita Brand;

d. further infringing the Copyright Protected Images and damaging Plaintiff's reputation and goodwill;

e. otherwise competing unfairly with Plaintiff through the unauthorized use of the Copyright Protected Images in any manner;

f. shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory sold or offered for sale through the unauthorized use of the Copyright Protected Images;

g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendant's stores on Defendant's Online Stores or the Online Platform, or any other domain name or online marketplace account that is being used to sell or is the means by which Defendant could continue to sell competing products through the unauthorized use of Plaintiff's Copyright Protected Images; and

h. operating and/or hosting websites at the Defendant's Internet stores and any other domain names registered or operated by Defendant that is involved with the distribution, marketing, advertising, offering for sale, or sale of any product through the unauthorized use of the Copyright Protected Images.

2. That Defendant, within fourteen (14) days after service of judgment with notice of entry thereof upon them, be required to file with the Court and serve upon Plaintiff a written report under oath setting forth in detail the manner and form in which Defendant has complied with paragraph 1 above;

3. Entry of an Order that, upon Plaintiff's request, those in privity with Defendant and those with notice of the injunction, including AliExpress, Walmart, Amazon, TikTok Shop, DHgate, eBay, Temu, and Wish, social media platforms such as Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendant's Online Stores, and domain name registrars, shall:

a. disable and cease providing services for any accounts through which Defendant engages in the sale of competing products by using, without authorization, the Copyright Protected Images;

b. disable and cease displaying any advertisements used by or associated with Defendant that display the Copyright Protected Images; and

c. take all necessary steps to prevent links to Defendant's Online Stores from displaying in search results, including, but not limited to, removing links to Defendant's domain names from any search index.

4. That Defendant accounts for and pays to Plaintiff all profits realized by them through the unauthorized use of the Copyright Protected Images.

5. In the alternative, that Plaintiff be awarded statutory damages of not less than \$750 and not more than \$30,000 for each and every infringement of the Copyright Protected Images pursuant to 17 U.S.C. § 504(c), which should be enhanced to a sum of not more than \$150,000 by 17 U.S.C. § 504(c)(2) because of Defendant's willful copyright infringement.

6. That Defendant, to the extent not enjoined for violation of the Copyright Act, be temporarily, preliminarily, and permanently enjoined under 815 ILCS § 510/1, et seq.

7. That Plaintiff be awarded attorneys' fees and costs damages as authorized by statute under 815 ILCS § 510/1, et seq.

8. That Plaintiff be awarded its reasonable attorneys' fees and costs; and

9. Award any and all other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff also demands a trial by jury of all issues so triable pursuant to Federal Rule of Civil Procedure 38.

Dated: July 29, 2025

Respectfully Submitted

By: /s/ Katherine M. Kuhn
Katherine M. Kuhn (IL Bar No. 6331405)
Nihat Deniz Bayramoglu (NV Bar No. 14030)
Gokalp Bayramoglu (NV Bar No. 15500)
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gokalp@bayramoglu-legal.com
Joseph@bayramoglu-legal.com
Attorneys for Plaintiff

Exhibit 1

Registration Number

VA 2-381-842

Effective Date of Registration:

March 07, 2024

Registration Decision Date:

March 07, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 06, 2023 to December 31, 2023

Title

Title of Group: Rotita38-2023

Number of Photographs in Group: 746

Completion/Publication

Year of Completion: 2023

Earliest Publication Date in Group: January 06, 2023

Latest Publication Date in Group: December 31, 2023

Nation of First Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., HongKong

Certification

Name: Claire Young
Date: February 05, 2024

Correspondence: Yes

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Basis for Registration: See photograph title list for the correct photograph publication date range and number of photos covered by this registration.

Rotita38-2023.[Group registration of published photographs.746 photographs. 2023-01-06 to 2023-12-31]

Actions

- **Registration Number / Date**
VA0002381842 / 2024-03-07
- **Type of Work**
Visual Material
- **Certificate**
 - [View PDF](#)
- **Title**
Rotita38-2023.[Group registration of published photographs.746 photographs. 2023-01-06 to 2023-12-31]
- **Application Title**
 - Rotita38-2023
- **Date of Creation**
2023
- **Copyright Claimant**
 - HONGKONG□LEYUZHEN□TECHNOLOGY□CO.,LIMITED. Address: FLAT/RM□A,9/F□SILVERCORP□INTERNATIONAL□TOWER,707-713□NATHAN□ROAD,□MONGKOK,KOWLOON,□HONGKONG., HongKong.
- **Authorship on Application**
 - HONGKONG□LEYUZHEN□TECHNOLOGY□CO.,LIMITED, Domicile: Hong Kong; employer for hire; Citizenship: Hong Kong. Authorship: photographs.
- **Description**
 - 746 photographs :
 - Electronic file (eService)
- **Copyright Note**

C.O. correspondence.

Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Basis for Registration: See photograph title list for the correct photograph publication date range and number of photos covered by this registration.
- **Nation of First Publication**
United States

- **Publication Date Range**

- 2023-01-06 to
- 2023-12-31

- **Names**

- HONGKONG□LEYUZHEN□TECHNOLOGY□CO.,LIMITED

Exhibit 2

Hong Kong Leyuzhen Technology Co. Limited v. Choove
1:25-cv-06290

Choove Storefront

Infringed Copyright VA0002381842



Rotita Image



Choove Image

Infringing Link:

<https://www.tiktok.com/view/product/1729590698263548384>



Search

Get app

Log in



TikTok Shop > Choove



Choove

700+ Followers | 376.5K+ Sold | 59 Videos



Women's Plain Criss Cross Backless Split Bodycon Dress, Elegant Casual Round Neck Tank Dress, Women's Summer Clothes for Party Dai...

4.4 ★★★★★ 61.5K sold

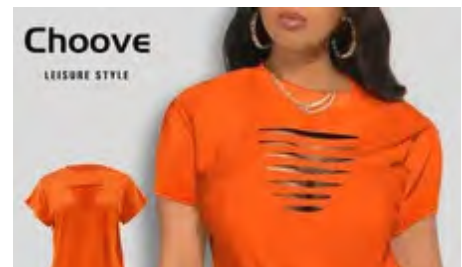
\$12.15 ~~\$24.79~~



Women's Button Pocket Tank Romper without Tube Top, Basic Fitted Casual Scoop Neck Sleeveless Romper, Summer Overalls, Fashion ...

4.1 ★★★★★ 27.0K sold

\$9.57 ~~\$18.79~~





Q hip enhancer shapewear

Search

Get app

Log in



TikTok Shop > Womenswear & Underwear > Women's Suits & Sets > Overalls > Plain Ruched Wrap Split Hem...



-42% \$26.44 \$45.59

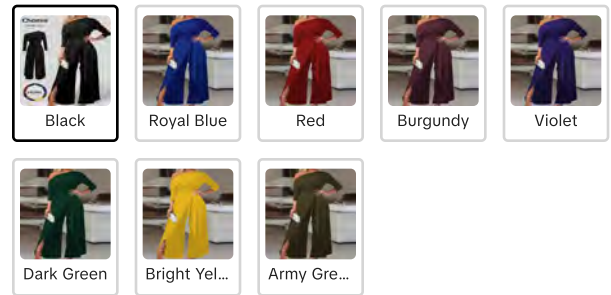
\$7.99 shipping on this order

Plain Ruched Wrap Split Hem Jumpsuit for Women, Chic Fit Modern Elegant Wide Leg Jumpsuit for Dating Daily Wear, Overalls for Women, Ladies Clothes for All Seasons, Clothing, Womenswear, Jumpsuitwomen

Sold by Choove

4.1★ (1.10k) 24.5K sold

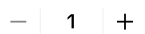
Color: Black



Size: S



Quantity:



Buy now

Choove Choove 85 Items

100% 24h response rate

80% On time delivery

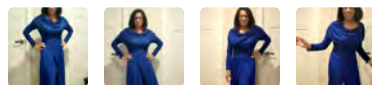
80% Positive feedback

4.1★ 1.10k global reviews

Antionette Blake



I absolutely love, love, love this jumpsuit. It fits perfectly, is flattering to my figure and washed well. I love the fabric and the color and I am looking forward to wearing it out this month!

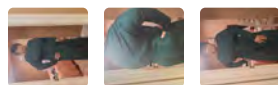


Item: Royal Blue, M March 8, 2025

PatriciaHenderso706



The color was on point. The material was stretchy and the design was more than expected. It is multi purpose brunch, or elegant event. Great for date night



Item: Dark Green, XL February 27, 2025