

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

HONG KONG LEYUZHEN
TECHNOLOGY CO. LIMITED,

Plaintiff,

v.

Choove,

Defendant.

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

**Honorable Franklin U.
Valderrama**

Magistrate Albert Berry, III

TEMPORARY RESTRAINING ORDER

Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“PLAINTIFF”) filed an *Ex Parte* Motion for Entry of a Temporary Restraining Order and Other Relief, R. 21, (the “Motion”) against the fully interactive, e-commerce store operating under the seller alias, Choove (“Defendant”). Plaintiff also filed a motion for service by publication and electronic service. R. 20. After reviewing the Motion and the accompanying record, this Court GRANTS PLAINTIFF’s Motions, and for its reasoning states as follows:

Plaintiff is the owner of certain Copyright Protected Images under the federal Copyright Registration Number VA0002381842 [Dkt No. 19-1]. 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.

This Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendant because Defendant directly targets its business

activities toward consumers in the United States, including Illinois. Specifically, PLAINTIFF has provided a basis to conclude that Defendant has targeted sales to Illinois residents by setting up and operating fully interactive online e-commerce stores that target United States consumers using one or more seller aliases, offer shipping to the United States, including Illinois, and has sold competing products through the use of unauthorized and unlicensed reproductions of Plaintiff's federally registered Copyright Protected Images to residents of Illinois (Dkt. No 19-1, Exhibit 1 to the Second Amended Complaint). In this case, Plaintiff has presented screenshot evidence that Defendant's e-commerce store is reaching out to do business with Illinois residents, publicly displaying unlicensed and unauthorized reproductions of Plaintiff's Copyright Protected Images, and selling competing products, which Illinois residents are able purchase.

The Court additionally finds that issuance of the requested injunctive relief would be in the public interest by protecting consumers from the likely hood of confusion by this online Defendant's e-commerce store and its public display of the unlicensed and unauthorized reproductions of Plaintiff's Copyright Protected Images. The Court also finds that it need not balance the interests of Defendant in this case as the Plaintiff has presented credible evidence to conclude this online Defendant's e-commerce store is engaging in, among other things, willful copyright infringement of the Plaintiff's Copyright Protected Images.

This 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 Declarations of Katherine M. Kuhn and Liangjie Li 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, Defendant could and likely would move any assets from accounts in financial institutions under this Court's jurisdiction to off-shore accounts. Accordingly, this Court orders that:

1. Defendant, its 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 PLAINTIFF's Copyright Protected Images under the federal Copyright Registration Numbers VA0002381842 [Dkt No. 19-1], including any reproductions, digital copies, print copies, photocopies, colorable imitations, replicas, simulations, mockups, in any format, either physical print or in digital formatting in connection or relation with the distribution, supply, sharing, reproduction, manufacturing, mass production, drop shipping, marketing, advertising, making, offering for sale, or sale of any competing product that is not a genuine product of PLAINTIFF's or not authorized by PLAINTIFF to be sold in connection with the PLAINTIFF's Copyright Protected Images;
- b. passing off, inducing, or enabling others to sell or pass off any competing product as a genuine Plaintiff product or any other product produced by

Plaintiff, that is not under the authorization, control, or supervision of PLAINTIFF or approved by PLAINTIFF;

- c. committing any acts calculated to lead to the likelihood of confusion among the consumers into believing that Defendant's products are those sold under the authorization, control, or supervision of PLAINTIFF, or are sponsored by, approved by, or otherwise connected with PLAINTIFF; and
- d. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, distributing, in any manner, products or inventory manufactured through the use of PLAINTIFF's Copyright Protected Images.

2. Defendant shall not transfer, move, relocate, change accounts, assign, remove, or dispose of any money in the account associated with the Seller Alias, Choove, identified in the Second Amended Complaint [Dkt. No. 19], including but not limited to any and all other assets or resources in any and all of Defendant's financial accounts.

3. PLAINTIFF is authorized to issue expedited written discovery to Defendant, pursuant to Federal Rules of Civil Procedure 33, 34, 36, and 45 related to:

- a. the identities and locations of Defendant, its 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 Defendant's operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendant's financial accounts, including Defendant's sales and listing history related to its respective Online Marketplaces; and
- c. any financial accounts, assets, or other resources owned or controlled by Defendant, including its 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, 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, TikTok Shop or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

4. Upon PLAINTIFF's request, any third party with actual notice of this Order who is providing services for the Defendant, or in connection with Defendant's Online Marketplaces, including, without limitation, any online marketplace platforms such as eBay, Inc., AliExpress, Alibaba, Amazon.com, Inc., Wish.com, TikTok Shop, Walmart, Temu, and Dhgate (collectively, the "Third Party Providers"), shall, within seven (7) calendar days after receipt of such notice, provide to Plaintiff

their responses to the Court Ordered 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 Defendant, its 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 Defendant's operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendant's financial accounts, including Defendant's sales and listing history related to their respective Online Marketplaces; and
- c. any financial accounts owned or controlled by Defendant, including its 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, Payoneer, TikTok Shop, Walmart, Temu, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

5. Upon PLAINTIFF's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 4, shall within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with the unlicensed and unauthorized use of PLAINTIFF's Copyright Protected Images.

6. Any Third-Party Providers, including TikTok Shop, PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:

- a. locate all accounts and funds connected to Defendant's seller aliases, including any e-mail addresses provided for Defendant by third parties; and
- b. restrain and enjoin any such accounts or funds from transferring, disposing, relocating, assigning, moving, or any other method of shifting any of the said money or any other asset or resource of Defendant until further order by this Court, or until the expiration of this court Order, whichever occurs first.

7. PLAINTIFF may provide notice of the proceedings in this case to Defendant, 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 with a link to said website to the e-mail addresses identified and provided for Defendant by third parties.

8. The Clerk of the Court is directed to issue a single original summons in the name of “Choove” that shall apply to Defendant(s). The combination of providing notice via electronic publication and e-mail, along with any notice that Defendant receives from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendant of the pendency of the action and afford it the opportunity to present its objections.


9. PLAINTIFF must provide notice to Defendant of any motion for preliminary injunction as required by Rule 65(a)(1).

10. By August 15, 2025, at 6:00 p.m., PLAINTIFF shall deposit with the Court One Thousand Dollars and Zero Cents (\$1,000.00) either cash 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.

11. Any Defendant that is 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, the Northern District of Illinois Local Rules, and Judge Valderrama’s Standing Orders. Any third party impacted by this Order may move for appropriate relief.

12. Provided that PLAINTIFF posts the security as described in ¶ 10 above by the time and date indicated in ¶ 10, this Temporary Restraining Order without notice shall become effect on August 18, 2025 at 6:00 p.m. and shall remain in effect for fourteen (14) days.

Date: August 11, 2025


United States District Judge
Franklin U. Valderrama