

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

Choove,

Defendants.

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

**Honorable Franklin U. Valderrama**

**Magistrate Albert Berry, III**

**PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff hereby moves this Honorable Court for entry of a Preliminary Injunction (the “Motion”). The scope of the requested Preliminary Injunction is substantially identical to the Temporary Restraining Order (the “TRO”) entered August 11, 2025, which went into effect August 18, 2025 [Dkt. No. 22] and was extended to September 15, 2025 [Dkt. No 27]. Plaintiff’s Motion, for which notice will be provided, is properly submitted to the Court on a non-*ex parte* basis. A Memorandum of Law in Support, and Declaration of Joseph W. Droter is filed concurrently with this Motion.

DATED: September 9, 2025

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

Katherine M. Kuhn (Bar No. 6331405)

**BAYRAMOGLU LAW OFFICES LLC**

233 S. Wacker Drive, 44<sup>th</sup> Floor, #57

Chicago, IL 60606

Tel: (702) 462-5973 Fax: (702) 553-3404

joseph@bayramoglu-legal.com

katherine@bayramoglu-legal.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of September 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 [sileanshow16@gmail.com](mailto:sileanshow16@gmail.com) and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and distributed to ecommerce platform, TikTok.

By: /s/ Joseph W. Droter  
Joseph W. Droter (Bar No. 6329630)  
**BAYRAMOGLU LAW OFFICES LLC**  
233 S. Wacker Drive, 44<sup>th</sup> Floor, #57  
Chicago, IL 60606  
Tel: (702) 462-5973 Fax: (702) 553-3404  
[joseph@bayramoglu-legal.com](mailto:joseph@bayramoglu-legal.com)  
*Attorneys for Plaintiff*

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

Choove,

Defendants.

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

**Honorable Franklin U. Valderrama**

**Magistrate Albert Berry, III**

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF’S  
MOTION FOR PRELIMINARY INJUNCTION**

Plaintiff HONG KONG LEYUZHEN TECHNOLOGY CO. LIMITED (“Plaintiff”) submits this Memorandum of Law in support of its Motion for Preliminary Injunction (the “Motion”).

**I. INTRODUCTION**

Plaintiff Hong Kong Leyuzhen Technology Co., Ltd., (“Plaintiff”) initiated this action against Choove, (“Defendant”), for infringement of United States Copyright Registration No. VA0002381842 (the “Copyright Protected Image”). As alleged in Plaintiff’s Second Amended Complaint [Dkt. No. 19], Defendant is knowingly and willfully offering competing products for sale, selling, and/or importing into the United States, through the unauthorized use of the Copyright-Protected Images on their Online Store.

**a. Procedural History**

On August 11, 2025, this Court granted Plaintiff’s Temporary Restraining Order (“TRO”) request on an *ex parte* basis, which went into effect August 18, 2025 [Dkt. No. 22] and was

extended to September 15, 2025, [Dkt. No 27]. Substantively, the TRO authorized and directed Plaintiff to provide notice of these proceedings and the preliminary injunction hearing to Defendant by electronically publishing a link to the Complaint, the TRO, and other relevant documents on a website, together with effectuating electronic service by email transmission to any addresses provided for Defendant by third party online platforms. [*Id.* ¶ 7.] The designated online platform, TikTok (the “Platform”), provided Plaintiff with the email address (sileanshow16@gmail.com) for the named Defendant, Choove (the “Defendant”), so that electronic service of process authorized under the TRO could be effectuated. (Droter Decl. ¶ 5.) On September 4, 2025, Plaintiff effectuated electronic service of process on the Defendant. (*Id.* ¶ 6.)

Based on the foregoing procedural history, including electronic service of process to the Defendant as required by the TRO, Plaintiff respectfully requests the Court now enter a Preliminary Injunction in this matter. Plaintiff further requests that the Court issue a Minute Order setting a deadline for Defendant to submit any oppositions to the Motion prior to conducting a scheduled hearing. Plaintiff will immediately serve Defendant electronically with the requested Minute Order once it is issued by the Court.

Substantively, as stated earlier, and as argued below, Plaintiff’s request for issuance of a preliminary injunction is in full compliance with the applicable standards for granting such relief.

## II. ARGUMENT

### A. **This Court has already found that the requirements for a preliminary injunction have been met.**

Plaintiff respectfully requests that this Court convert the TRO to a preliminary injunction to prevent further illegal conduct by Defendant. To date, Plaintiff has presented virtually identical

grounds for the issuance of preliminary injunctive relief, and such relief has been granted by numerous courts in this judicial district. *See, e.g., Hong Kong Leyuzhen Tech. Co., Ltd. v. Kailinna*, Case No. 1:25-cv-02837, Dkt. No. 29 (Chang, J.); *Hong Kong Leyuzhen Tech. Co., Ltd. v. SkyTrade*, Case No. 1:25-cv-02807, Dkt. No. 26 (Alonso, J.); *Hong Kong Leyuzhen Tech. Co., Ltd. v. YuweiPlus*, Case No. 1:25-cv-03181, Dkt. No. 28 (Jenkins, J.). Plaintiff submits that these numerous prior decisions demonstrate the merits of the company's current request for issuance of preliminary injunctive relief by this Court. Accordingly, Plaintiff asserts that the Court should grant the Motion and enter a Preliminary Injunction against the Defendant. Further, Plaintiff asserts that no circumstances have changed since Plaintiff had previously requested relief in the form of a Temporary Restraining Order. As such, Plaintiff is unaware of any new information that would affect the Court's original analysis.

Since the standard for granting a TRO and the standard for granting a preliminary injunction are identical in this Circuit, the requirements for entry of a preliminary injunction extending the TRO have been satisfied. *See, e.g. Charter Nat'l Bank & Trust v. Charter One Fin., Inc.*, No. 1:01-cv-00905, 2001 WL 527404, \*1 (N.D. Ill. May 15, 2001) (citations omitted). To be entitled to preliminary injunctive relief, the moving party must first show that it has (1) there is a reasonable likelihood that Plaintiff will succeed on the merits; (2) Plaintiff will suffer irreparable injury if the order is not granted because there is no adequate remedy at law; (3) the balance of hardships tips in Plaintiff's favor; and (4) the injunction will not disserve the public interest. *Columbia Pictures Indus., Inc. v. Jasso*, 927 F. Supp. 1075, 1076 (N.D. Ill. 1996). As this Court has already entered a TRO on June 17, 2025, which took effect on June 20, 2025, it has already determined that the above requirements have been satisfied.

In determining these factors, the Court “exercise[s] its discretion to determine whether the balance of harms weighs in favor of the moving party or whether the nonmoving party or public interest will be harmed sufficiently that the injunction should be denied.” *Christian Legal Soc’y v. Walker*, 453 F.3d 853, 859 (7th Cir. 2006). “This process involves engaging in what we term the sliding scale approach; the more likely the [moving party] will succeed on the merits, the less the balance of irreparable harms need favor the [moving party’s] position.” *Ty, Inc. v. Jones Group, Inc.*, 237 F.3d 891, 895 (7th Cir. 2001). The sliding scale approach is not mathematical in nature, rather “it is more properly characterized as subjective and intuitive, one which permits district courts to weigh the competing considerations and mold appropriate relief.” *Id.* at 895-896. The greater the movant's likelihood of succeeding on the merits, the less the balancing of harms need be in his favor. *See Eli Lilly & Co. v. Natural Answers, Inc.*, 233 F.3d 456, 461 (7th Cir. 2000).

As established by the evidence in the Declaration of Katherine M. Kuhn Docket No. 21-07 with the submission of the renewed motion for TRO, and by this Court’s entry of the TRO, the above requirements for entry of a preliminary injunction have been satisfied. The record establishes that through Defendant’s operations, Defendant has infringed upon Plaintiff’s federally registered Copyright No. VA0002381842. Thus, plaintiff is entitled to preliminary injunctive relief.

### **III. The Current Bond is Sufficient to Protect Defendant’s Interests.**

The Court has previously required Plaintiff to post a bond of \$1,000.00 in connection with the issuance of the TRO. The same circumstances, if not more, supporting the Court’s determination of this bond amount apply to Plaintiff’s request for entry of a Preliminary Injunction. Such a strong showing militates against a subsequent finding that injunctive relief was improperly

granted. Accordingly, Plaintiff requests that the Court maintain the current bond amount required for issuance of the TRO for issuance of the preliminary injunction.

**IV. CONCLUSION**

For the foregoing reasons, Plaintiff respectfully requests the Court enter a Preliminary Injunction. If required, a minute order setting a deadline for Defendant to oppose the Motion, which Plaintiff will immediately serve Defendant with if issued by the Court. If a hearing on the Preliminary Injunction Motion cannot be heard prior to the current expiration of the TRO, then Plaintiff requests a fourteen (14) day extension of the TRO or until there is a ruling on the Preliminary Injunction Motion. Finally, Plaintiff respectfully requests that the Court maintain the current bond amount required under the TRO, together with issuing any other relief that it deems just and proper.

DATED: September 9, 2025

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

Katherine M. Kuhn (Bar No. 6331405)

**BAYRAMOGLU LAW OFFICES LLC**

233 S. Wacker Drive, 44<sup>th</sup> Floor, #57

Chicago, IL 60606

Tel: (702) 462-5973 Fax: (702) 553-3404

joseph@bayramoglu-legal.com

katherine@bayramoglu-legal.com

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of September 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 sileanshow16@gmail.com and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and distributed to ecommerce platform, TikTok.

By: /s/ Joseph W. Droter  
Joseph W. Droter (Bar No. 6329630)  
**BAYRAMOGLU LAW OFFICES LLC**  
233 S. Wacker Drive, 44<sup>th</sup> Floor, #57  
Chicago, IL 60606  
Tel: (702) 462-5973 Fax: (702) 553-3404  
joseph@bayramoglu-legal.com  
*Attorneys for Plaintiff*

**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**

**DECLARATION OF JOSEPH W. DROTER, ESQ.**  
**IN SUPPORT OF PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION**

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 Motion for Preliminary Injunction (the “Motion”).

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. Limited (“Plaintiff”). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff’s Motion for Temporary Restraining Order (the “TRO”) was granted by the Court on August 11, 2025, which went into effect August 18, 2025 [Dkt. No. 22] and was extended to September 15, 2025, [Dkt. No 27].

5. The designated online platform, TikTok, (the “Platform”) provided Plaintiff with the email address (sileanshow16@gmail.com) for the named Defendant, Choove (the “Defendant”) so that electronic service of process authorized under the TRO could be effectuated.

6. On September 4, 2025, Plaintiff effectuated electronic service of process on the Defendant.

7. Genuine and authentic copies of the unpublished decisions cited in Plaintiff’s Memorandum of Law in Support of Motion for Entry of Preliminary Injunction are attached hereto as **Exhibit 1**.

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

Executed on September 9, 2025, in Chicago, Illinois.

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

**CERTIFICATE OF SERVICE**

I hereby certify that on the 9th day of September 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 sileanshow16@gmail.com and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and distributed to ecommerce platform, TikTok.

By: /s/ Joseph W. Droter  
Joseph W. Droter (Bar No. 6329630)  
**BAYRAMOGLU LAW OFFICES LLC**  
233 S. Wacker Drive, 44<sup>th</sup> Floor, #57  
Chicago, IL 60606  
Tel: (702) 462-5973 Fax: (702) 553-3404  
joseph@bayramoglu-legal.com  
*Attorneys for Plaintiff*

# Exhibit 1

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

KAILINNA,

Defendant.

Case No. 1:25-cv-02837-EEC-JC

**Honorable Edmond E. Chang**

**Magistrate Jeffrey Cole**

**ORDER FOR PRELIMINARY INJUNCTION**

THIS CAUSE being before the Court by Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, ("Plaintiff") Motion for Entry of Preliminary Injunction ("Motion") and this Court having heard the evidence before it, hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against Defendant, KAILINNA, a Chinese Entity, who operates fully interactive, e-commerce stores on Temu.com (collectively, the "Seller Alias").

The Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendant because Defendant directly targets 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 Defendant has targeted sales to Illinois residents by setting up and operating 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 has sold knockoff 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. 1-1, Ex. 1 to the Complaint, which includes Plaintiff’s Copyrights: (1) VA0002379888; (2) VA0002379894; and (3) VA0002379899.

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order (“TRO”) should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff’s previously granted Motion for Entry of a Temporary Restraining Order establishes that Plaintiff has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted. Specifically, Plaintiff has proved a prima facie case of copyright infringement because (1) Plaintiff is the lawful assignee of all right, title and interest in and to the federally registered copyright(s), (2) Defendant makes, uses, offers for sale, sells, and/or imports into the United States for subsequent sale or uses knock-off products that infringes directly and/or indirectly Plaintiff’s federally registered copyrights and (3) an ordinary observer would be deceived into thinking the Infringing Products were the same as Plaintiff’s federally registered copyrights. Furthermore, Defendant’s continued, and unauthorized use of Plaintiff’s federally registered copyrights irreparably harms Plaintiff through loss of customers’ goodwill and reputational harm. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendant’s actions. As such, this Court orders that

1. Defendant, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be 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 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;

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. Defendant shall not transfer or dispose of any money or other of Defendant assets in any of Defendant's financial accounts.

2. Upon Plaintiff's request, any third party with actual notice of this Order who is providing services for Defendant or in connection with any of Defendant's Online Marketplaces, such as eBay, Inc. ("eBay"), Temu.com, AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com

("Wish.com"), and Dhgate (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

a. the identities and locations of Defendant, 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 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 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.

3. Upon PLAINTIFF's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 2, shall within ten (10) business days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendant

in connection with the sale of counterfeit and infringing goods using the Plaintiff's Copyrights.

4. Defendant shall be restrained and enjoined from transferring or disposing of any money or other of Defendant's assets until further ordered by this Court.

5. Any Third-Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within ten (10) business days of receipt of this Order:

a. locate all accounts and funds connected to Defendant's Seller Aliases, including, but not limited to, any financial accounts connected to the information related to Defendant, the e-mail addresses identified in Exhibits, and any e-mail addresses provided for Defendant by third parties; and

b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendant's assets until further ordered by this Court.

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

a. the identities and locations of Defendant, 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 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 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, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

7. 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.

8. Plaintiff is authorized to issue any such expedited discovery requests via e-mail. Defendant shall respond to any such discovery requests within three (3) business days of being served via e-mail.

9. Plaintiff may provide notice of these proceedings to Defendant, including notice of the preliminary injunction hearing, service of process pursuant to Fed. R. Civ. P. 4(f)(3), and

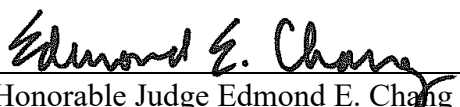
any future motions by electronically publishing a link to the Complaint, this Order and other relevant documents on a website <https://blointernetenforcement.com/> or link to a onedrive website with same, and by sending an e-mail to the e-mail addresses identified in Exhibits and any e-mail addresses provided for Defendant by third parties that includes a link to said website. 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 them the opportunity to present their objections.

10. Plaintiff has seven (7) business days, if not already deposited, to deposit with the Court one thousand (\$1,000.00), as surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of wrongful restraint hereunder.

11. 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 and Northern District of Illinois Local Rules.

12. This Preliminary Injunction without notice is entered at 5:00 p.m. on the 22<sup>nd</sup> day of April and shall remain in effect until Final Disposition of this case or until further order by the Court.

DATED: 04/22/2025

  
Honorable Judge Edmond E. Chang  
United States District Judge

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

SkyTrade,

Defendant.

Case No. 1:25-cv-02807-JLA-MV

**Honorable Jorge L. Alonso**

**Magistrate Maria Valdez**

**PRELIMINARY INJUNCTION ORDER**

THIS CAUSE being before the Court on Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, ("Plaintiff") Motion for Entry of Preliminary Injunction ("Motion") and this Court having heard the evidence before it, hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against Defendant, Skytrade, A Chinese Entity, who operates fully interactive, e-commerce stores on Temu.com identified (collectively, the "Seller Alias").

This Court finds [PLAINTIFF] has provided notice to Defendant in accordance with the Temporary Restraining Order entered April 2, 2025, [DOCKET NO. 18] ("TRO"), and Federal Rule of Civil Procedure 65(a)(1).

This Court also finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendant because Defendant directly targets their 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 the e-commerce store that targets United States consumers using one or more seller aliases, offer shipping to the United States, including to the State of Illinois, and have sold

knockoff 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. 15-1, Ex. 1 to the Complaint, which includes Plaintiff's Copyrights: VA0002379899 and VA0002379907. In this case, [PLAINTIFF] has also presented evidence that each Defendant e-commerce store is reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores through which Illinois residents can and do purchase products using unauthorized use and display of Plaintiff's Copyrights. *See* Docket No.[15-7], which includes evidence confirming that the Defendant e-commerce store does stand ready, willing and able to ship its counterfeit goods to customers in Illinois using the unauthorized use and display of Plaintiff's Copyrights.]

This Court also finds that the injunctive relief previously granted in the TRO should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of [PLAINTIFF]'s previously granted Motion for Entry of a TRO establishes that [PLAINTIFF] has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that [PLAINTIFF] will suffer irreparable harm if the injunction is not granted.

Specifically, PLAINTIFF has proved a prima facie case of copyright infringement because (1) PLAINTIFF is the lawful assignee of all right, title and interest in and to the federally registered copyright(s), (2) Defendant makes, uses, offers for sale, sells, and/or imports into the United States for subsequent sale or uses knock-off products that infringes directly and/or indirectly PLAINTIFF'S federally registered copyrights and (3) an ordinary observer would be deceived into thinking the Infringing Products were the same as

PLAINTIFF'S federally registered copyrights. Furthermore, Defendant's continued, and unauthorized use of PLAINTIFF'S federally registered copyrights irreparably harms PLAINTIFF through loss of customers' goodwill and reputational harm. Monetary damages fail to address such damage and, therefore, [PLAINTIFF] has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendant's actions. Accordingly, this Court orders that:

1. Defendant, their officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be preliminarily 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 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 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, 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.

2. Defendant shall not transfer or dispose of any money or other of Defendant's assets in any of Defendant's financial accounts.
3. 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, 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.
4. Upon [PLAINTIFF]'s request, Defendant and any third party with actual notice of this Order who is providing services for Defendant, or in connection with any of Defendant's Online Marketplaces, including, without limitation, any online marketplace platforms such as Temu, eBay, Inc., AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc., ContextLogic Inc. d/b/a Wish.com ("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 Defendant, 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 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 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, Inc. ("PayPal"), Alipay, Wish.com, Alibaba, Ant Financial Services Group ("Ant Financial"), Amazon Pay, 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 Defendant in connection with the sale of counterfeit and infringing goods using the [PLAINTIFF] Copyrights.

6. Any Third Party Providers, including Temu, 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, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, any e-mail addresses provided for Defendant by third parties; and
  - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendant's assets until further order by this Court.
7. [PLAINTIFF] may provide notice of the proceedings in this case to Defendant, including service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Pleadings, 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 provided for Defendant by third parties. 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 them the opportunity to present their objections.
8. Plaintiff's Pleading(s) [DOCKET NO. 2] and Exhibits [1]-[2] thereto, and the TRO [DOCKET NO. 18] are unsealed.
9. Any Defendant 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.

10. The \$[1,000] bond posted by [PLAINTIFF] shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

Dated: April 16, 2025

SO ORDERED:

A handwritten signature in black ink, consisting of a large, loopy initial 'J' followed by a smaller 'L' and a period.

---

Jorge L. Alonso  
United States District Judge

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

HONG KONG LEYUZHEN TECHNOLOGY  
CO. LIMITED,

Plaintiff,

v.

YuweiPlus,

Defendant.

**Case No. 1:25-cv-03181-LCJ-JC**

**Honorable Lindsay C. Jenkins**

**ORDER FOR PRELIMINARY INJUNCTION**

THIS CAUSE being before the Court on Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, ("Plaintiff") Motion for Entry of Preliminary Injunction ("Motion") and this Court having heard the evidence before it, hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against Defendant, YuweiPlus, A Chinese Entity, who operates fully interactive, e-commerce stores on Temu.com identified (collectively, the "Seller Alias")

The Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendant because Defendant directly targets 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 Defendant has targeted sales to Illinois residents by setting up and operating 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 has sold knockoff 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. 12-1, Ex. 1 to the First Amended Complaint, which includes Plaintiff's Copyright, VA0002379894.

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("TRO") should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff's previously granted Motion for Entry of a Temporary Restraining Order establishes that Plaintiff has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted. Specifically, Plaintiff has proved a prima facie case of copyright infringement because (1) Plaintiff is the lawful assignee of all right, title and interest in and to the federally registered copyright(s), (2) Defendant makes, uses, offers for sale, sells, and/or imports into the United States for subsequent sale or uses knock-off products that infringes directly and/or indirectly Plaintiff's federally registered copyrights and (3) an ordinary observer would be deceived into thinking the Infringing Products were the same as Plaintiff's federally registered copyrights. Furthermore, Defendant's continued, and unauthorized use of Plaintiff's federally registered copyrights irreparably harms Plaintiff through loss of customers' goodwill and reputational harm. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendant's actions. As such, this Court orders that

1. Defendant, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be 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 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;

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. Defendant shall not transfer or dispose of any money or other of Defendant assets in any of Defendant's financial accounts.

2. Upon Plaintiff's request, any third party with actual notice of this Order who is providing services for Defendant or in connection with any of Defendant's Online Marketplaces, such as eBay, Inc. ("eBay"), Temu.com, AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), and Dhgate (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Plaintiff expedited discovery,

including copies of all documents and records in such person's or entity's possession or control relating to:

a. the identities and locations of Defendant, 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 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 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.

3. Upon PLAINTIFF's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 2, shall within ten (10) business days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendant in connection with the sale of counterfeit and infringing goods using the Plaintiff's Copyrights.

4. Defendant shall be restrained and enjoined from transferring or disposing of any money or other of Defendant's assets until further ordered by this Court.

5. Any Third-Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within ten (10) business days of receipt of this Order:

a. locate all accounts and funds connected to Defendant's Seller Aliases, including, but not limited to, any financial accounts connected to the information related to Defendant, the e-mail addresses identified in Exhibits, and any e-mail addresses provided for Defendant by third parties; and

b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendant's assets until further ordered by this Court.

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

a. the identities and locations of Defendant, 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 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 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, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

7. 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.

8. Plaintiff is authorized to issue any such expedited discovery requests via e-mail. Defendant shall respond to any such discovery requests within three (3) business days of being served via e-mail.

9. Plaintiff may provide notice of these proceedings 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 <https://blointernetenforcement.com/> or link to a onedrive website with same, and by sending an e-mail to the e-mail addresses identified in Exhibits and

any e-mail addresses provided for Defendant by third parties that includes a link to said website. 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 them the opportunity to present their objections.

10. Plaintiff has seven (7) business days, if not already deposited, to deposit with the Court one thousand (\$1,000.00), as surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of wrongful restraint hereunder.

11. 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 and Northern District of Illinois Local Rules.

12. This Preliminary Injunction without notice is entered at 9:00 a.m. on April 15, 2025 and shall remain in effect until Final Disposition of this case or until further order by the Court.

Enter: 25-cv-3181

DATED: April 15, 2025



---

Honorable Lindsay C. Jenkins  
United States District Judge