

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

XYZ CORPORATION,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS AND UNINCORPORATED  
ASSOCIATIONS IDENTIFIED IN  
SCHEDULE "A" HERETO,

Defendants.

**Case No.: 1:25-cv-11544-JLA-AB**

**Honorable Jorge L. Alonso  
Magistrate Albert Berry, III**

**TEMPORARY RESTRAINING ORDER**

Plaintiff XYZ Corporation ("Plaintiff") filed an *Ex Parte* Motion for Temporary Restraining Order, including an Asset Restraint, and Expedited Discovery (the "Motion") against the Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations identified on Schedule "A" to the Complaint (collectively, the "Defendants"), who operate their e-commerce stores (the "Online Stores") maintained on the Amazon marketplace platform (the "Platform"). After reviewing the Motion and the accompanying record, this Court GRANTS Plaintiff's Motion as follows.

This Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendants because Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Plaintiff has provided a basis to conclude that Defendants have 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 Illinois, and have sold products using infringing and counterfeit versions of

Plaintiff's federally registered patent, U.S. Patent No. 12,324,440 (the "'440 Patent"), to residents of Illinois. In this case, Plaintiff has presented evidence that each Defendant's Online 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 counterfeit versions of the '440 Patent. *See* Docket No. 1-3 and the Declaration of Jennifer Pantuso in support of the Motion, which include evidence confirming that each of the Online Stores do stand ready, willing and able to ship its counterfeit goods to customers in Illinois bearing infringing and/or counterfeit versions of the automatic smoker claimed in the '440 Patent.

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 Declaration of Xiaoling Chen in support of the Motion and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. Specifically, in the absence of an *ex parte* Order, Defendants could and likely would move any assets from accounts in financial institutions under this Court's jurisdiction to offshore accounts. Accordingly, this Court orders that:

1. Defendants, their officers, agents, servants, employees, attorneys, and all persons acting in active concert or participation with them be temporarily enjoined and restrained from:
  - a. manufacturing, importing, offering to sell, or selling any product that infringes the '440 Patent;
  - b. aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon the '440 Patent; and
  - c. Effecting assignments or transfers, forming new entities or associations or utilizing

any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in Subparagraphs (a) and (b)

2. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.
3. Plaintiff is authorized to issue expedited written discovery to Defendants, pursuant to Federal Rules of Civil Procedure 33, 34, and 36, related to:
  - a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Stores and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Stores; and
  - c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, 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).

4. Upon Plaintiff's request, any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of Defendants' Online Marketplaces, including, without limitation, any online marketplace platforms such as eBay, Inc., AliExpress, Alibaba, Amazon.com, Inc., Wish.com, and Dhgate (collectively, the "Third Party Providers"), shall, within seven (7) calendar days after receipt of such notice, provide to Plaintiff expedited discovery, limited to copies of documents and records in such person's or entity's possession or control sufficient to determine:
  - a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and
  - c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Alipay, Wish.com, Alibaba, Ant Financial, Amazon Pay, or other merchant account providers, payment providers, third party processors, 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 Defendants in connection with the sale of goods that infringe the '440 Patent.
6. Any Third Party Providers, including 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 Defendants' seller aliases, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, and any e-mail addresses provided for Defendants by third parties; and
  - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further order by this Court.
7. The Clerk of the Court is directed to issue a single original summons in the name of "Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations" and shall apply to all Defendants.
8. Plaintiff must provide notice to Defendants of any motion for preliminary injunction as required by Rule 65(a)(1).
9. Plaintiff's Schedule A to the Complaint [Dkt. No.1-1] and other documents already sealed in this case shall remain sealed until further order by this Court or until the Order expires, whichever occurs earlier.
10. Within seven (7) calendar days of entry of this Order, Plaintiff shall deposit with the Court \$10,000.00 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 Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and the Northern District of Illinois Local Rules. Any third party impacted by this Order may move for appropriate relief.
  12. This Temporary Restraining Order without notice is entered at 9:00 a.m. on this 1st day of October, 2025 and shall remain in effect for 14 calendar days.

A handwritten signature in black ink, consisting of a large, loopy initial 'J' followed by a smaller 'L' and a period, all enclosed within a large, horizontal oval stroke.

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HONORABLE JORGE L. ALONSO  
UNITED STATES DISTRICT JUDGE

**SCHEDULE A**

<b>DEFENDANT NO.</b>	<b>SELLER NAME</b>	<b>SELLER ID</b>
1	Kaymer	AZ1KND1LY7SZ1
2	Yelusonw-Direct	A3TYMI03NVE9Z5
3	Tomzio Global	A21BJ5AST86I6G
4	Haizhilianjia	AFVAL7MQFB2YO
5	LIUFEI3C	A3D5DAXVTJZ2NT
6	Iridesc	A1YWLURHR0V03
7	HJM LLC	A3GO07AEDIAZTJ
8	JABAITEK	A2HIS6SVTCLPVX
9	Tusmeek	AIOR5YNVO69ZO
10	long shine	A2UOKSXW1ZEF8U
11	pinsiwangluo	A1BPQ9F8JMEOU9
12	CiCii	AO57TFERJOYG4
13	CCchong	A1U8HHO9IHCIVK
14	AshPeak	A1B8OC007KTRD1
15	dongguanhaitun	A8PHAGTEINOOY
16	ZIHUITRADING	A30XBSL2O2OAMJ
17	SMOFAOSU	A1QRGFOHLQPFDM
18	TLMUSE Official	A2CG566LZLGE73
19	Mastertool	AMS0CLNRLOHEG
20	CENGGU	A3Q7E2MTUMI82E
21	YIFE US	A1CLKDW1L6ZGY3
22	Bluopai	A2AMHSN5W8SWW8
23	Seyicot	A3U3H2N06F4OA0
24	Redwing store	A1C8HKT56DTF51
25	lipingguo	A35VUZKOA1D1IJ
26	KAKUNM	A20TL77D4AWLS6
27	K-LINK	A10BJ6LW1OMDH
28	XDTIME	A3KRVAWQ1WD5SH

DEFENDANT NO.	SELLER NAME	SELLER ID
29	biaoyitong	A34FTKWH5400LY
30	YichengShop	A3DYAK4UZA7HFF
31	Think Buddy Inc	A2R94F2CCA2MK1
32	Tunijx	A1VWWAKLAC8BS3
33	YIILEE	A35Q5H84TFXP9U
34	Michoi	A2870Q455BK4Y2
35	SOYESIN	A48LMBGOUFHY
36	zhengyuan-us	A1KINAORD5QRF
37	STARBLINK	A33VMBPOYKR3PC
38	Friengood	A1IU009WV5LCVC
39	GENUIE US	A38KYU0LN092GF
40	TDAGRO-US	A38PLWYBHAG9G1
41	TMEOIIPY	A229LTFE5AWYJF
42	LILANG	A11TZ1VWDXTPLY
43	Ideashop	A1OG50J9PB8UIQ
44	Leke Technology Co., LTD	A135JM7RIV6AQ
45	JJY23 Direct	A2U4RJ5352CJ3Q
46	Bameos	A1TX71P4W19WH3
47	NMYH	AZBYQJYSKKYXH
48	YuehuiTech	A2DA2GA4A6Q6Y3
49	Elanbells	A247O55U2IEZ0L
50	TXONE-US	A2QHMA42C0IC9V
51	TrueSmoker Supply	AJM4NBRNZP6U2
52	Davpo	A1SBOUQJPXFTFD
53	ZPZ Direct	A2TTFMOM8ARX7V
54	fengjiupeng	A2YQBN9WZGRITK
55	Frstem	A198190LITI7E5
56	XuanlianGo	A2WP1TMK49NEJO
57	DGW1995	A1BZ3M5EX0R1MD

<b>DEFENDANT NO.</b>	<b>SELLER NAME</b>	<b>SELLER ID</b>
58	Szyijia	ALPAPKJVU1WJD
59	XIEYIGMO	A1SQY7Q96EFA35
60	SAKERPLUS	A1U0E051XIMFCB
61	US Otufan	A88LRW16RNHTR
62	bingegeBbc	A2HGSL9SK92NKT
63	PAFXMT	A3614N889DY3HG
64	CWWY-US	ABJGYJTIA3X3J
65	smmall	AG70I1YJPS3W3
66	IRZAKI STORE	A2VP2M1R5UPIJA
67	WANTHER	AZCL5O85PVY6U