

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA**

CASE NO.: 1:25-cv-22143-BECERRA

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

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

Defendants.

MOTION TO UNSEAL

Plaintiff Hong Kong Leyuzhen Technology Co. Limited ("Plaintiff"), by and through its undersigned counsel, respectfully moves this Court for an Order unsealing all documents that have been sealed from the court docket and returning all portions of the court file to the public records.

As grounds therefore, Plaintiff states as follows:

1. On May 22, 2025, Plaintiff filed a Motion to File Under Seal [Dkt. No. 8], requesting the following be sealed:

- a. Complaint with Jury Demand and Exhibit Nos. 1-3;
- b. Plaintiff's *Ex-Parte* Motion for Temporary Restraining Order, a Temporary Asset Restraint, and Expedited Discovery; including; 1. Declaration of William Brees in Support of Plaintiff's *Ex-Parte* Motion for Temporary Restraining Order; 2. Declaration of Anisah Beaston in Support of Plaintiff's *Ex-Parte* Motion for Temporary Restraining Order, a Temporary Asset Restraint, and Expedited Discovery; 3. Proposed Order Granting

Plaintiff's *Ex-Parte* Motion for Temporary Restraining Order, a Temporary Asset Restraint, and Expedited Discovery;

c. Plaintiff's Motion for Alternative Service of Process by E-Mail and/or Electronic Publication; including; 1. Declaration of William Brees in Support of the Motion for Alternative Service of Process by E-Mail and/or Electronic Publication; 2. Associated Exhibits Listing Address of the Defendants; and 3. Proposed Order Granting Plaintiff's Motion for Alternative Service of Process by E-Mail and/or Electronic Publication

2. On May 27, 2025, the Court Granted Plaintiff's Motion to Seal. [Dkt. No. 9].

3. On June 3 2025, Plaintiff filed the listed documents under Seal as permitted by the Court's Order.

4. On August 20, 2025, The Court issued an Omnibus Order to re-file Documents in Compliance with Procedures in Schedule A Causes of Actions [Dkt. No. 19].

5. On September 22, 2025, Plaintiff filed its Renewed Motions including a renewed Motion to File Under Seal, Renewed Motion for Alternate Service, and *Ex Parte* Motion for Temporary Restraining Order, Including a Temporary Injunction, a Temporary Asset Restraint, and Expedited Discovery in compliance with the Court's Order. [Dkt. Nos. 23, 24 and 25].

6. On October 9, 2025, the Court granted Plaintiff's Motions for Alternate Service and Temporary Restraining Order [Dkt. Nos. 30 and 31].

7. Plaintiff immediately began preparing service on the third-party platform Amazon.

8. On October 21, 2025, Plaintiff filed it Motion for First Extension of the TRO, as the third-party platform required more time to comply with its requirements of providing expedited Discovery.

9. On October 23, 2025, the Court granted Plaintiff's First Motion to Extend Temporary Restraining Order [Dkt. No. 34]. As part of the Court's Order, Plaintiff was required to immediately file a motion to unseal the *ex parte* Motion for Temporary Restraining Order [Dkt. No. 29] and the Sealed Complaint [Dkt. No. 11] once service is effectuated.

10. On October 24, 2025, Plaintiff received Defendants' contact information from the third-party provider.

11. On October 24, 2025, Plaintiff served Defendants at the e-mail addresses provided by the third-party platform with the Summons, Complaint, TRO and a link to a website containing the case related documents. [Dkt. No. 35]

12. As a seal on this matter is no longer required, Plaintiff respectfully requests the documents be unsealed and be returned to the public portion of the Court file.

WHEREFORE, Plaintiff respectfully requests this Court issue an Order unsealing all documents filed with the Court that have been restricted from the public docket and direct the Clerk to return those portions to the public record.

Dated: October 24, 2025

Respectfully Submitted,

By: /s/ William R. Brees
William R. Brees (Bar No. 98886)
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I, hereby certify that on the 24th day of October 2025, I electronically filed the foregoing document with the clerk of the court using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented 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 is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third-party.

/s/ William R. Brees
WILLIAM R. BREES (FL BAR NO. 98886)
BAYRAMOGLU LAW OFFICES LLC

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[PROPOSED] ORDER GRANTING MOTION TO UNSEAL

On October 24, 2025, Plaintiff filed a Motion to Unseal. Being fully advised, the following are hereby **ORDERED**:

1. The Motion to Unseal is **GRANTED**.
2. The Clerk is directed to **UNSEAL** this case and return all docket entries to the public record.

DATED: _____, 2025

HONORABLE JACQUELINE BECERRA
UNITED STATES DISTRICT JUDGE