

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

Shenzhen Peishi Advertising Media Co., Ltd.,

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-12683-JLA-AB

Honorable Jorge L. Alonso

Magistrate Albert Berry, III

PRELIMINARY INJUNCTION ORDER

Plaintiff Shenzhen Peishi Advertising Media Co., Ltd. (“[PLAINTIFF]”) filed a Motion for Entry of a Preliminary Injunction against the against the fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (collectively, “Defendants”) and using at least the domain names identified in Schedule A (the “Defendant Domain Names”) and the online marketplace accounts identified in Schedule A (the “Online Marketplaces”). After reviewing the Motion and the accompanying record, this Court GRANTS [PLAINTIFF]’s Motion in part as follows.

This Court finds [PLAINTIFF] has provided notice to Defendants in accordance with the Temporary Restraining Order entered [October 27, 2025], [DOCKET NO. 18] (“TRO”), and Federal Rule of Civil Procedure 65(a)(1).

¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces.

This Court also 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 to the State of Illinois, and have sold products that infringes Plaintiff's U.S. Patent No. 12,324,440 (the "'440 Patent") to residents of the State of Illinois. [Compl. ¶¶ 17-20, 24, 26, 30-50] [Docket Nos.1-3, 2-3]. [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 that infringe the '440 Patent, which includes evidence confirming that each Defendant e-commerce store does stand ready, willing and able to ship its counterfeit goods that infringe the '440 Patent to customers in Illinois [Dkt. No. 14-1]

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 design infringement because (1) Plaintiff is the lawful assignee of all right, title and interest in and to the '440 Patent, (2)

Defendants make, use, offer for sale, sell, and/or import into the United States for subsequent sale or use products that infringe directly and/or indirectly the '440 Patent, and (3) an ordinary observer would be deceived into thinking the Infringing Product was the same as the '440 Patent .Furthermore, Defendants' continued, and unauthorized use of PLAINTIFF'S '440 Patent 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 Defendants' actions. Accordingly, this Court orders that:

1. Defendants, 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. offering for sale, selling and importing the Infringing Product;
 - b. Aiding, abetting, contributing to, or otherwise assisting anyone in offering for sale, selling, and importing the Infringing Product;
 - c. committing any acts calculated to cause consumers to believe that Defendants' 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 of the '440 Patent

2. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' 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, Defendants and any third party with actual notice of this Order who is providing services for any of Defendants, or in connection with any of Defendants' Online Marketplaces, including, without limitation, any online marketplace platforms such as 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 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, 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 Defendants in connection with the sale of counterfeit and infringing goods of the [PLAINTIFF] 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, the e-mail addresses identified in 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. [PLAINTIFF] may provide notice of the proceedings in this case to Defendants, 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 Defendants by third parties. The Clerk of the Court is directed to issue a single original summons in the name of "THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE "A" HERETO" " that shall apply to all Defendants. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendants receive from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.
8. Plaintiff's Pleading(s) [DOCKET NO. 1] and Exhibits [1]-[3] thereto Schedule A to the Pleading(s) [DOCKET NO(s). 1-1], the Declaration of [Jennifer Pantuso] [DOCKET NO. 14-1], and the TRO [DOCKET NO. 18] are unsealed.
9. 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.

10. The \$[15,000.00] bond posted by [PLAINTIFF] shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

SO ORDERED:



Honorable Judge Jorge L. Alonso
United States District Judge

Dated: December 2, 2025

DEFENDANT NO.	SELLER NAME	SELLER ID
1	Biticolor	A1APPH00B87IAQ
2	IGERI	A14SXFUCNK02QS
4	shenzhenshishengyudashangmaoyouxiangongsi	A283P0K9EI7FM1
5	HMINLTD	A3UBOBVL2ZEXRK
6	PockFog	A2Z9FWNDX5KCTG
9	gunyingaj	A1616ZAKA00HO6
10	WOLIOS	A2372X3PRDWUQ2
12	Newgam	A3M1XOF92D1LF
13	bliblo 🐾 Maternal and infant US	A3TE0MN246GRID
15	YanzhiJie	A5BKPCGV6URMX