

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-12132-MFK

Honorable Matthew F. Kennelly

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 October 23, 2025, which was then extended up to and including November 21, 2025 [Dkt. Nos. 23, 25]. 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 is filed concurrently with this Motion.

DATED: November 17, 2025

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

BAYRAMOGLU LAW OFFICES LLC

233 S Wacker Drive, 44th Floor, #57

Chicago IL 60606

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

joseph@bayramoglu-legal.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website, and I will send an e-mail to any e-mail addresses provided for Defendant by third parties that includes a link to said website.

By: /s/ Joseph W Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC

**IN THE UNITED STATES DISTRICT COURT
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HONG KONG YU'EN E-COMMERCE CO.
LIMITED,

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Honorable Matthew F. Kennelly

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

Plaintiff HONG KONG YU'EN E-COMMERCE CO. LIMITED ("Plaintiff") submits this Memorandum of Law in support of its Motion for Preliminary Injunction (the "Motion").

I. INTRODUCTION

Plaintiff Hong Kong Yu'En E-Commerce Co., Ltd., ("Plaintiff") initiated this action against the Defendants listed in Schedule "A", (the "Defendants"), for infringement of United States Trademark Registration No.: 5,994,759, (the "Trademark"). As alleged in Plaintiff's Complaint [Dkt. No. 1], Defendants are knowingly and willfully offering for sale, selling, and/or importing into the United States, through the unauthorized use of the Copyright on their Online Stores, counterfeit inferior products.

a. Procedural History

On October 23, 2025, this Court granted Plaintiff's TRO and Service by Publication, Electronic Service, and Expedited Discovery request on an *ex parte* basis [Dkt. Nos. 22, 23] then

extended the TRO up to and including November 21, 2025 [Dkt. No. 28]. Substantively, the Service by Publication, Electronic Service, and Expedited Discovery order [Dkt. No 22] authorized and directed Plaintiff to provide notice of these proceedings, and the TRO required Plaintiff to provide notice of any preliminary injunction hearing [Dkt. No. 23] to Defendants by electronically publishing a link to the Complaint, this Order, and other relevant documents on a website and by sending an e-mail to any e-mail addresses provided for Defendants by third parties with the service documents attached in PDF format. [Dkt No. 22 ¶ 3.] On November 11, 2025, Amazon restricted 4 out of 11 Defendants' account and produced 4 Defendants' email addresses. (Droter Decl. ¶ 5.) Plaintiff then effectuated electronic service on November 14, 2025, after receiving the issued summons from the court. (*Id.* ¶ 6.) The remaining 7 Defendants remain pending responses from Amazon, which include email addresses so that service can be effectuated. (*Id.* ¶ 7.) Plaintiff's Motion for Preliminary Injunction only applies to those 4 Defendants that were properly served with notice in this action. (*Id.* ¶ 8.)

Based on the foregoing procedural history, including having effectuated electronic service of process to the 4 Defendants as required by the TRO, Plaintiff respectfully requests the Court now enter a Preliminary Injunction in this matter. Plaintiff further requests the Court issue a Minute Order setting a deadline for Defendants to submit any oppositions to the Motion. Plaintiff will immediately serve the Defendants 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 Defendants. To date, Plaintiff has presented virtually identical grounds for the issuance of preliminary injunctive relief addressing allegations of Internet-based counterfeiting, and such relief has been granted, by the court in this judicial district. See, e.g., *Hong Kong Yu'En E-Commerce Co. Limited v. The Individuals*, Case No. 1:25-cv-11286, Dkt. No. 11286 (Kocaras, J.) Plaintiff submits that the prior decision demonstrates 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 Defendants. 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 public interest will not be disserved by the

injunction. *Columbia Pictures Indus., Inc. v. Jasso*, 927 F. Supp. 1075, 1076 (N.D. Ill. 1996). As this Court has already entered a TRO on October 23, 2025, it has already found that the above requirements have been satisfied.

If these threshold requirements are met by the moving party, the court then “exercise[s] its discretion whether the balance of the harms weighs in favor of the moving party or whether the nonmoving party or the public interest will be harmed sufficiently such 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 Exhibit 3 to the Complaint [Dkt. No 1-03, 2-03], the memorandum in support of Plaintiff’s motion for TRO [Docket No.13-1] with the submission of the 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 illegal operations, Defendants have infringed upon Plaintiff’s Federally Registered Trademark. Thus, plaintiff is entitled to preliminary injunctive relief.

B. The Current Bond is Sufficient to Protect Defendant’s Interests.

The Court has previously required Plaintiff to post a bond in the sum of \$5,000.00 in

connection with issuance of the TRO. [Dkt. No. 28.] The exact 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 the Court maintain the current bond amount required for issuance of the TRO for issuance of the preliminary injunction.

III. CONCLUSION

For the foregoing reasons, Plaintiff respectfully requests the Court enter a Preliminary Injunction as requested above. If required, a minute order setting a deadline for Defendants to oppose the Motion and set a hearing on same can be issued, which Plaintiff will immediately serve Defendants with the Minute Order if issued by the Court. Plaintiff additionally respectfully requests the Court maintain the current bond amount required under the TRO, together with issuing any other relief that it deems just and proper.

DATED: November 17, 2025

Respectfully submitted,

By: /s/ Joseph W Droter

Joseph W. Droter (Bar No. 6329630)

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Chicago IL 60606

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Attorneys for Plaintiff

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I hereby certify that on November 17, 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website, and I will send an e-mail to any e-mail addresses with PDF documents of the same, provided by the Platform, Amazon, that includes a link to said website.

By: /s/ Joseph W Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC

**IN THE UNITED STATES DISTRICT COURT
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HONG KONG YU'EN E-COMMERCE CO.
LIMITED,

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THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
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SCHEDULE "A" HERETO,

Defendants.

Case No. 1:25-cv-12132-MFK

Honorable Matthew F. Kennelly

**DECLARATION OF JOSEPH W. DROTER
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 YU'EN E-COMMERCE CO. LIMITED ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. On October 23, 2025, this Court granted Plaintiff's TRO and Service by Publication, Electronic Service, and Expedited Discovery request on an *ex parte* basis [Dkt. Nos. 22, 23] then extended the TRO up to and including November 21, 2025 [Dkt. No. 28].

5. On November 11, 2025, the designated online platform, Amazon, (the "Platform") provided Plaintiff with the email addresses and restricted the account for only 4 out of 11 of the named Defendants listed on Schedule "A", (the "Defendants") so that electronic service of process authorized under the TRO could be effectuated.

6. On November 14, 2025, after receiving the summons from the clerk's office, Plaintiff effectuated electronic service of process on 4 Defendants.

7. The remaining 7 Defendants remain pending responses from Amazon, which include email addresses so that service can be effectuated.

8. Plaintiff's Motion for Preliminary Injunction only applies to those 4 Defendants that were properly served with notice in this action. Plaintiff will file a new motion once it receives the information for the 7 remaining Defendants with proper notice.

9. 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.

10. A list with the status of each Defendant served is attached hereto as Exhibit 2.

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

Executed on November 17, 2025, in Chicago, Illinois.

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

CERTIFICATE OF SERVICE

I hereby certify that on November 17, 2025, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website, and I will send an e-mail to any e-mail addresses with PDF documents of the same, provided by the Platform, Amazon, that includes a link to said website.

By: /s/ Joseph W Droter
Joseph W. Droter (Bar No. 6329630)
BAYRAMOGLU LAW OFFICES LLC

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
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EASTERN DIVISION**

HONG KONG YU'EN
E-COMMERCE CO LIMITED

Plaintiff,

v.

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

Defendants.

Case No. 1:25-cv-11286-CPK-YBK

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff, Hong Kong Yu'En E-Commerce 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 Defendants, The Individuals, Corporations, Limited Liability Companies, Partnerships and Unincorporated Associations Identified in Schedule "A" Hereto, which operate a fully interactive, e-commerce store on Walmart.com (collectively, the "Seller Alias").

The 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 consumers in the State of 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 has sold competing products through the unauthorized use and display of Plaintiff's Trademark (the "Plaintiff's Trademark") to residents of the State of Illinois. Docket No. 1-1, Ex. 1 to the Complaint, which includes Plaintiff's United States Trademark Registration No.: 5,994,759.

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 trademark (2) Defendants make, use, offers for sale, sells, and/or imports into the United States for subsequent sale or uses competing products that infringe directly and/or indirectly, through the unauthorized use of Plaintiff's federally registered trademarks and (3) an ordinary observer would be deceived into thinking the Infringing Products were the same as Plaintiff's federally registered trademarks.

Furthermore, Defendants' continued, unauthorized use of Plaintiff's federally registered trademark 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. 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 Trademark, 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 Trademark;

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;

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 Trademarks; and

e. Defendants shall not transfer or dispose of any money or other of Defendant assets in any of Defendants financial accounts.

2. Upon Plaintiff's request, any third party with actual notice of this Order who is providing services for Defendants or in connection with any of Defendant's Online Marketplaces, such as eBay, Inc. ("eBay"), Temu.com, Walmart.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 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 Defendant's 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, 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 Defendants in connection with the sale of counterfeit and infringing goods using the Plaintiff's Trademark.

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

5. Any Third-Party Providers, including PayPal, Payoneer, 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 Defendants' Seller Aliases, including, but not limited to, any financial accounts connected to the information related to Defendants, 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 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 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, Payoneer, 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 Defendants' Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afiliat 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., Walmart.com, 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 Defendants' 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. Defendants 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 Defendants, 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 Defendants 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 Defendants 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 five thousand (\$5,000.00), as a 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. 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 Northern District of Illinois Local Rules.

12. This Preliminary Injunction without notice is entered on 10/10/2025 and shall remain in effect until Final Disposition of this case or until further order by the Court.

DATED: October 10, 2025



HONORABLE CHARLES P. KOCORAS
UNITED STATES DISTRICT JUDGE

EXHIBIT 2

Defendant No.	Seller's Name	Status of Service
1	2025 Spring Summer Sale	Served November 14, 2025
2	CuckooVerse	Served November 14, 2025
3	★★★★★PET CDIM	Served November 14, 2025
4	Preppy Clothes Clearance Sale ★★★★★	Served November 14, 2025
5	★★★★★yaoe ye Boutique Clothing Specialty Store	Data Not Provided Yet By Amazon
6	SYHISHERE	Data Not Provided Yet By Amazon
7	PinkQueen	Data Not Provided Yet By Amazon
8	MELYUM	Data Not Provided Yet By Amazon
9	ZAFUL-Rongjor	DISMISSED
10	Floerns	Data Not Provided Yet By Amazon
11	Jolefile	Data Not Provided Yet By Amazon