

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

SHEIN DISTRIBUTION CORPORATION,

Defendant.

Case No. 1:25-cv-14451-SLE-JTG

**SECOND AMENDED COMPLAINT
FOR COPYRIGHT INFRINGEMENT**

JURY TRIAL DEMANDED

SECOND AMENDED COMPLAINT

Plaintiff, Hong Kong Leyuzhen Technology Co. Limited, (“Plaintiff”), by and through its undersigned counsel, hereby files this complaint for copyright infringement under Copyright Act of 1976, 17 U.S.C. § 101 et seq., against Shein Distribution Corporation (“SDC”), (“Defendant”), and for Plaintiff’s Second Amended Complaint hereby alleges as follows:

I. JURISDICTION AND VENUE

1. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Copyright Act, 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)–(b), and 28 U.S.C. § 1331.

2. Venue is proper in this District pursuant to 28 U.S.C. § 1391 because a substantial part of the events giving rise to the claims occurred in this District and Defendant has offered for sale and sold products to consumers in this District using Plaintiff’s Copyright Protected Photographs. This Court may exercise personal jurisdiction over Defendant because Defendant conducts business throughout the United States, including Illinois, through SHEIN.com and has

purposefully directed infringing sales and marketing activities toward this District. See **Exhibit 2** showing Defendant's sales and shipping confirmations to Illinois.

II. INTRODUCTION

3. Plaintiff is the owner of the federal copyright registrations: VA0002379930; VA0002382152; VA0002381192; VA0002381186; VA0002379881; VA0002381842; VA0002384843; VA0002413197; VA0002415185; and VA0002379907 (the "Copyright Protected Photographs") which protects the creative content of Plaintiff's Photographs. Plaintiff is a Hong Kong based women's fashion brand who operates under the brand name, Rotita. The Rotita brand is globally recognized for its clothing items. Plaintiff uses the Copyright Protected Photographs to advertise, market, and otherwise promote Plaintiff's products. Plaintiff's copyright protected photographs are carefully composed to attract, invite, display, and show consumers the clothing, dresses, tops, swimsuits, and other clothing items Plaintiff has to offer. Plaintiff's copyright protected photographs are one of Plaintiff's most effective means of connecting with consumers and are essential to the commercial success of the Rotita brand.

4. This action has been filed by Plaintiff to combat Defendant who has reproduced and displayed Plaintiff's Copyright Protected Photographs without authorization. Defendant trades upon Plaintiff's reputation, goodwill, and valuable copyrights by selling and/or offering for sale products using Plaintiff's Copyright Protected Photographs in its online listings.

5. In an effort to profit from the creative content of Plaintiff's Copyright Protected Photographs, Defendant used the Copyright Protected Photographs without authorization in connection with its online storefronts and product listings.

6. Attached as **Exhibit 2** are true and correct copies of the Defendant's storefront and listings showing Defendant's unauthorized reproduction and display of Plaintiff's Copyright

Protected Photographs. Plaintiff brings this action to halt Defendant's continuing infringement and recover the damages caused thereby.

7. Plaintiff has been and continues to be irreparably damaged through loss of control over the creative content of the valuable copyright, reputation, goodwill, the quality, and ability to license as a result of Defendant's actions and seeks injunctive and monetary relief.

III. THE PARTIES

8. Plaintiff is the owner of numerous Group Registrations of Published Photographs ("GRPPH"), specifically United States Copyright Registration Nos. VA0002379930; VA0002382152; VA0002381192; VA0002381186; VA0002379881; VA0002381842; VA0002384843; VA0002413197; VA0002415185; and VA0002379907 (the "Copyright Protected Photographs" or "Group Registrations of Published Photographs") and the Group Registration of Published Photographs are attached hereto as **Exhibit 1**. Upon information and belief, the Copyright Protected Photographs have an effective date that predates the Defendant's acts of copyright infringement. The Registrations are valid, subsisting, and in full force and effect. A true and correct copy of the registration certificates are attached hereto as **Exhibit 1**.

9. Plaintiff is a Hong Kong based, women's fashion brand, operating under the Rotita brand, with international reach. The Copyright Protected Photographs are used to advertise, market, and otherwise promote Plaintiff's products. Plaintiff's copyright protected photographs are carefully composed with the intention of attracting consumer interest and effectively showcasing various categories of clothing, such as dresses, swimsuits, tops, pants, jumpsuits, and accessories.

10. Plaintiff has invested significant time, resources, and effort in building consumer awareness, goodwill, and brand recognition for its products, which are advertised and marketed using the Copyright Protected Photographs.

11. Plaintiff has invested substantial time, expense, and creative resources in producing and curating the Copyright Protected Photographs for use in advertising and promoting its products. The photographs have independent commercial value and serve as an important driver of consumer interest, traffic, and sales.

12. Plaintiff has not authorized Defendant to reproduce, display, distribute, create derivative works from, advertise with, or otherwise use the Copyright Protected Photographs. No person or entity other than Plaintiff may use the Copyright Protected Photographs absent express permission.

13. Defendant is SHEIN Distribution Corporation, located at 777 S. Alameda St., Suite 400, Los Angeles, CA 90021, with a registered agent, Paracorp Incorporated 2804 Gateway Oaks Dr., #100, Sacramento, CA 95833. Defendant conducts business throughout the United States, including within Illinois and in this judicial district, through the operation of the fully interactive commercial websites and online marketplaces, including SHEIN.com and the storefronts INAWLY and EMERY ROSE. Defendant targets the United States, including Illinois, and has offered to sell and, on information and belief, has displayed the Copyright Protected Photographs without authorization to consumers within the United States, including Illinois and in this judicial district. See **Exhibit 2**.

14. Through its operation of the INAWLY and EMERY ROSE storefronts on SHEIN.com, Defendant reproduced, displayed, distributed, and used Plaintiff's Copyright

Protected Photographs without authorization in connection with the marketing, advertising, offering for sale, and sale of products identified in Exhibit 2.

IV. DEFENDANT'S UNLAWFUL CONDUCT

**COUNT I
COPYRIGHT INFRINGEMENT (17 U.S.C. § 501(a))**

15. Plaintiff hereby realleges and incorporates by reference the allegations set forth in paragraphs 1 through 14.

16. Plaintiff's Copyright Protected Photographs are of substantial value and were produced and created at considerable time, effort, and expense. Plaintiff is the sole owner of each workgroup Registration of Published Photographs, and Plaintiff's copyright protected photographs have been registered with the U.S. Copyright Office. See **Exhibit 1**.

17. At all relevant times, Plaintiff has owned and held the exclusive rights infringed by Defendant, including, but not limited to, the Plaintiff's Copyright Protected Photographs, including derivative works thereof.

18. Upon information and belief, Defendant obtained access to the Copyright Protected Photographs through Plaintiff's ordinary business activities. Thereafter, without authorization or consent, Defendant unlawfully reproduced Plaintiff's Copyright Protected Photographs and engaged in infringement by publishing and distributing such work through the SHEIN.com online markets in connection with the marketing and sale of Defendant's competing products.

19. Plaintiff alleges that Defendant further infringed Plaintiff's Copyright Protected Photographs by creating, or causing to be created, unauthorized derivative works from Plaintiff's Copyright Protected Photographs by producing and distributing such reproductions without Plaintiff's authorization. Defendant has, without Plaintiff's consent, published online infringing

derivative works of Plaintiff's Copyright Protected Photographs. In doing so, Defendant has violated Plaintiff's exclusive rights of reproduction and distribution. Defendant's actions constitute an infringement of Plaintiff's exclusive rights in violation of the Copyright Act, 17 U.S.C. § 101, et seq. Attached as **Exhibit 2** are true and correct screenshots and web captures of Defendant's infringing activity.

20. Further, as a direct and proximate result of Defendant's acts of copyright infringement, Defendant has unlawfully obtained direct and indirect profits it would not have realized but for its infringement of Plaintiff's Copyright Protected Photographs. Plaintiff is entitled to an accounting disgorgement of Defendant's profits directly and indirectly attributable to its infringement of Plaintiff's Copyright Protected Photographs.

21. Defendant's acts of infringement have been willful, intentional, and in reckless disregard of Plaintiff's rights.

22. As a result of Defendant's infringement of Plaintiff's exclusive rights under the Copyright Act, Plaintiff is entitled to relief pursuant to 17 U.S.C. § 504, together with an award of costs and reasonable attorneys' fees pursuant to 17 U.S.C. § 505.

23. The conduct of Defendant has caused and, unless enjoined and restrained by this Court will continue to cause Plaintiff great and irreparable harm that cannot fully be compensated or measured in monetary damages. Plaintiff has no adequate remedy at law. Accordingly, pursuant to 17 U.S.C. §§ 502-503, Plaintiff is entitled to injunctive relief prohibiting Defendant from further infringing Plaintiff's Copyright Protected Photographs and requiring the destruction of all unauthorized copies of Plaintiff's Copyright Protected Photographs.

24. Defendant's unauthorized copies, digital files, listings, advertisements, promotional materials, and other embodiments of Plaintiff's Copyright Protected Photographs from which

additional copies may be reproduced should be impounded, deleted, or destroyed pursuant to 17 U.S.C. § 503.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendant as follows:

A. That Defendant, its officers, agents, servants, employees, attorneys, and all persons acting in concert with them, be preliminarily and permanently enjoined pursuant to 17 U.S.C. §§ 502–503 from:

1. Reproducing, displaying, distributing, offering for sale, or otherwise using Plaintiff's Copyright Protected Photographs, or any works substantially similar thereto, without authorization;
2. Manufacturing, importing, distributing, offering for sale, or selling any products using Plaintiff's Copyright Protected Photographs or infringing derivatives thereof;
3. Assisting, aiding, or abetting any other person or entity in engaging in any of the activities set forth in subparagraphs (1)–(2).

B. That Defendant be ordered to:

1. Remove any listings, SKUs, advertisements, or promotional materials that reproduce, display, or otherwise use Plaintiff's Copyright Protected Photographs; and
2. be preliminarily and permanently enjoined from relisting, reposting, or using Plaintiff's Copyright Protected Photographs, or substantially similar versions thereof, in connection with the marketing, advertising, offering for sale, or sale of any products without Plaintiff's authorization;

C. That Defendant be ordered to preserve and maintain all documents, electronically stored information, sales records, advertising records, financial records, communications, and other

materials relating to the reproduction, display, marketing, offering for sale, or sale of products using Plaintiff's Copyright Protected Photographs, and to provide a full accounting of all revenues, profits, units sold, and other benefits derived from such infringing conduct.

D. That Plaintiff be awarded, at its election, either:

1. Plaintiff's actual damages together with all profits of Defendant attributable to their infringement, pursuant to 17 U.S.C. § 504(b); or
2. Statutory damages pursuant to 17 U.S.C. § 504(c), including enhanced damages for willful infringement.

E. That Plaintiff be awarded its costs of suit, including reasonable attorneys' fees, pursuant to 17 U.S.C. § 505.

F. That Plaintiff be granted such other and further relief as this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff also demands a trial by jury of all issues so triable pursuant to Federal Rule of Civil Procedure 38.

Dated: June 24, 2026

Respectfully Submitted

By: /s/ Joseph W. Droter
Joseph Droter (IL Bar No. 6329630)
Nihat Deniz Bayramoglu (NV Bar No. 14030)
Nazly Aileen Bayramoglu (NM Bar No. 151569)
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
Deniz@bayramoglu-legal.com
Nazly@bayramoglu-legal.com
Counsel for Plaintiff

Exhibit 1

Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Shirley P. Miller

United States Register of Copyrights and Director

Registration Number

VA 2-379-881

Effective Date of Registration:

November 12, 2023

Registration Decision Date:

January 22, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 31, 2019 to December 23, 2019

Title

Title of Group: Rotita10-2019

Number of Photographs in Group: 302

Completion/Publication

Year of Completion: 2019

Earliest Publication Date in Group: January 31, 2019

Latest Publication Date in Group: December 23, 2019

Nation of First Publication: United States

Author

- Author: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created: photographs
- Work made for hire: Yes
- Citizen of: Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A, 9/F SILVERCORP INTERNATIONAL TOWER, 707-713
NATHAN ROAD, MONGKOK, KOWLOON, Hong Kong, 999077, Hong Kong

Rights and Permissions

Organization Name: Bayramoglu Law Offices
Name: Nazly Aileen Bayramoglu

Email: tm@bayramoglu-legal.com
Telephone: (702)462-5973
Address: 1540 West Warm Springs Road
Suite 100
Henderson, NV 89014

Certification

Name: Nazly Bayramoglu
Date: November 12, 2023

Correspondence: Yes
Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Registration #: VA0002379881
Service Request #: 1-13195130423



Bayramoglu Law Offices
Nazly Aileen Bayramoglu
1540 West Warm Springs Road
Suite 100
Henderson, NV 89014



Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

United States Register of Copyrights and Director

Registration Number

VA 2-381-186

Effective Date of Registration:

November 07, 2023

Registration Decision Date:

February 02, 2024

Title

Title of Work: 230809730R-1

Completion/Publication

Year of Completion: 2023

Date of 1st Publication: August 10, 2023

Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** 2-d artwork of digital model, dressed, and in posed posture
- Work made for hire:** Yes
- Citizen of:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-713
NATHAN ROAD, MONGKOK,KOWLOON, HONG KONG, 999077, Hong Kong

Rights and Permissions

Organization Name: Bayramoglu Law Offices LLC
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Email: tm@bayramoglu-legal.com
Telephone: (702)462-5973
Address: 1540 West Warm Springs Road
Suite 100
Henderson, NV 89014

Certification

Name: Nazly Bayramoglu
Date: November 07, 2023

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: No registration for clothing itself and the applied designs in the clothing.



Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Shirley Perlmutter

United States Register of Copyrights and Director

Registration Number

VA 2-381-192

Effective Date of Registration:

November 07, 2023

Registration Decision Date:

February 02, 2024



Title

Title of Work: 230804860R-1

Completion/Publication

Year of Completion: 2023

Date of 1st Publication: August 04, 2023

Nation of 1st Publication: United States

Author

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** 2-d artwork of digital model, dressed, and in posed posture
- Work made for hire:** Yes
- Citizen of:** Hong Kong

Copyright Claimant

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-713
NATHAN ROAD, MONGKOK,KOWLOON, HONG KONG, 999077, Hong Kong

Rights and Permissions

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Email: tm@bayramoglu-legal.com
Telephone: (702)462-5973
Address: 1540 West Warm Springs Road
Suite 100
Henderson, NV 89014

Certification

Name: Nazly Bayramoglu
Date: November 07, 2023

Correspondence: Yes
Copyright Office notes: Regarding basis for registration: No registration for clothing itself and the applied designs in the clothing.



Registration Number
VA 2-379-930
Effective Date of Registration:
December 20, 2023
Registration Decision Date:
January 22, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)
For Photographs Published: January 05, 2023 to September 20, 2023

Title _____

Title of Group: Rotita25-2023
Number of Photographs in Group: 746

Completion/Publication _____

Year of Completion: 2023
Earliest Publication Date in Group: January 05, 2023
Latest Publication Date in Group: September 20, 2023
Nation of First Publication: United States

Author _____

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
Author Created: photographs
Work made for hire: Yes
Citizen of: Hong Kong
Domiciled in: Hong Kong

Copyright Claimant _____

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP
INTERNATIONAL TOWER,707-713 NATHAN ROAD,
 MONGKOK,KOWLOON, HONGKONG., HONGKONG

Certification _____

Name: Claire Yang

Date: December 19, 2023

Correspondence: Yes

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.



Registration Number

VA 2-381-842

Effective Date of Registration:

March 07, 2024

Registration Decision Date:

March 07, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 06, 2023 to December 31, 2023

Title _____

Title of Group: Rotita38-2023

Number of Photographs in Group: 746

Completion/Publication _____

Year of Completion: 2023

Earliest Publication Date in Group: January 06, 2023

Latest Publication Date in Group: December 31, 2023

Nation of First Publication: United States

Author _____

• **Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED

Author Created: photographs

Work made for hire: Yes

Citizen of: Hong Kong

Domiciled in: Hong Kong

Copyright Claimant _____

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., HongKong

Certification _____

Name: Claire Young

Date: February 05, 2024

Correspondence: Yes
Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Basis for Registration: See photograph title list for the correct photograph publication date range and number of photos covered by this registration.



Registration Number

VA 2-382-152

Effective Date of Registration:

December 25, 2023

Registration Decision Date:

February 12, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 02, 2021 to December 31, 2021

Title _____

Title of Group: Rotita14-2021

Number of Photographs in Group: 747

Completion/Publication _____

Year of Completion: 2021

Earliest Publication Date in Group: January 02, 2021

Latest Publication Date in Group: December 31, 2021

Nation of First Publication: United States

Author _____

- **Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant _____

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG.,
HONGKONG

Certification _____

Name: Claire Yang

Date: December 06, 2023

Correspondence: Yes

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Basis for Registration: Registration does not extend to any useful article depicted. Registration extends to deposited photographs only. 17 USC 101, 102 (a), and 113.



Registration Number

VA 2-384-843

Effective Date of Registration:

March 01, 2024

Registration Decision Date:

March 01, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 05, 2021 to December 31, 2021

Title _____

Title of Group: Rotita17-2021

Number of Photographs in Group: 749

Completion/Publication _____

Year of Completion: 2021

Earliest Publication Date in Group: January 05, 2021

Latest Publication Date in Group: December 31, 2021

Nation of First Publication: United States

Author _____

- **Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong
- Domiciled in:** Hong Kong

Copyright Claimant _____

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG.,
HONGKONG

Certification _____

Name: Claire Yang

Date: December 06, 2023

Correspondence: Yes

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

Basis for Registration: Registration does not extend to any useful article depicted. Registration extends to deposited photographs only. 17 USC 101, 102 (a), and 113.



Registration Number

VA 2-413-197

Effective Date of Registration:

April 25, 2024

Registration Decision Date:

September 18, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 06, 2023 to November 24, 2023

Title _____

Title of Group: Rotita34-2023

Number of Photographs in Group: 749

Completion/Publication _____

Year of Completion: 2023

Earliest Publication Date in Group: January 06, 2023

Latest Publication Date in Group: November 24, 2023

Nation of First Publication: United States

Author _____

• **Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED

Author Created: photographs

Work made for hire: Yes

Citizen of: Hong Kong

Domiciled in: Hong Kong

Copyright Claimant _____

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-
713 NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG., Hong Kong

Certification _____

Name: Claire Yang

Date: December 19, 2023

Correspondence: Yes

Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.



Registration Number
VA 2-415-185
Effective Date of Registration:
September 25, 2024
Registration Decision Date:
September 30, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)
For Photographs Published: January 04, 2024 to August 15, 2024

Title _____

Title of Group: Rotita41-2024
Number of Photographs in Group: 483

Completion/Publication _____

Year of Completion: 2024
Earliest Publication Date in Group: January 04, 2024
Latest Publication Date in Group: August 15, 2024
Nation of First Publication: United States

Author _____

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
Author Created: photographs
Work made for hire: Yes
Citizen of: Hong Kong
Domiciled in: Hong Kong

Copyright Claimant _____

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM 511, 5/F MING SANG INDUSTRIAL BUILDING, 19-21 HING
YIP ST KWUN TONG, KL HONGKONG., Hong Kon, Hong Kong

Certification _____

Name: Claire Young
Date: August 30, 2024

Correspondence: Yes
Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.



Certificate of Registration



This Certificate issued under the seal of the Copyright Office in accordance with title 17, *United States Code*, attests that registration has been made for the work identified below. The information on this certificate has been made a part of the Copyright Office records.

Shiria Perlmutter

United States Register of Copyrights and Director

Registration Number

VA 2-379-907

Effective Date of Registration:

November 12, 2023

Registration Decision Date:

January 22, 2024

Copyright Registration for a Group of Published Photographs

Registration issued pursuant to 37 C.F.R. § 202.4(i)

For Photographs Published: January 04, 2023 to August 22, 2023

Title _____

Title of Group: Rotita8-2023

Number of Photographs in Group: 568

Completion/Publication

Year of Completion: 2023

Earliest Publication Date in Group: January 04, 2023

Latest Publication Date in Group: August 22, 2023

Nation of First Publication: United States

Author _____

- Author:** HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
- Author Created:** photographs
- Work made for hire:** Yes
- Citizen of:** Hong Kong

Copyright Claimant _____

Copyright Claimant: HONGKONG LEYUZHEN TECHNOLOGY CO.,LIMITED
FLAT/RM A,9/F SILVERCORP INTERNATIONAL TOWER,707-713
NATHAN ROAD, MONGKOK,KOWLOON, HONGKONG, Hong Kong,
999077, Hong Kong

Rights and Permissions _____

Organization Name: Bayramoglu Law Offices
Name: Nazly Aileen Bayramoglu

Email: tm@bayramoglu-legal.com
Telephone: (702)462-5973
Address: 1540 West Warm Springs Road
Suite 100
Henderson, NV 89014

Certification

Name: Nazly Bayramoglu
Date: November 12, 2023

Correspondence: Yes
Copyright Office notes: Regarding title information: Deposit contains complete list of titles that correspond to the individual photographs included in this group.

Regarding group registration: A group of published photographs may be registered on one application with one filing fee only under limited circumstances. ALL of the following are required: 1. All photographs (a) were created by the same author AND (b) are owned by the same copyright claimant AND (c) were published in the same calendar year AND 2. The group contains 750 photographs or less AND 3. A sequentially numbered list of photographs containing the title, file name and month of publication for each photograph included in the group must be uploaded along with other required application materials. The list must be submitted in an approved document format such as .XLS or .PDF. The file name for the numbered list must contain the title of the group and the Case Number assigned to the application.

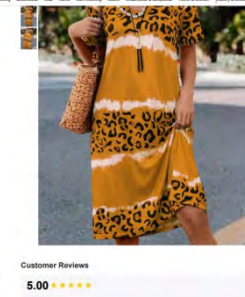
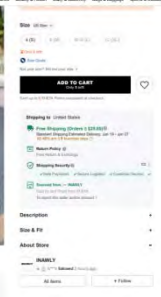
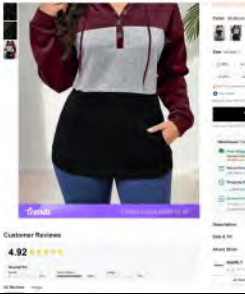
Registration #: VA0002379907
Service Request #: 1-13195130257



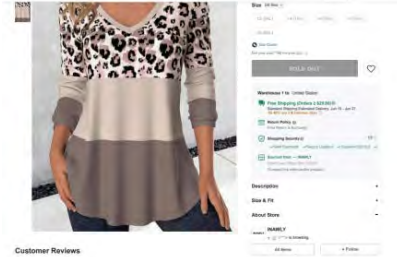
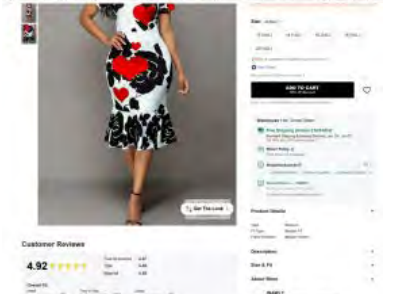
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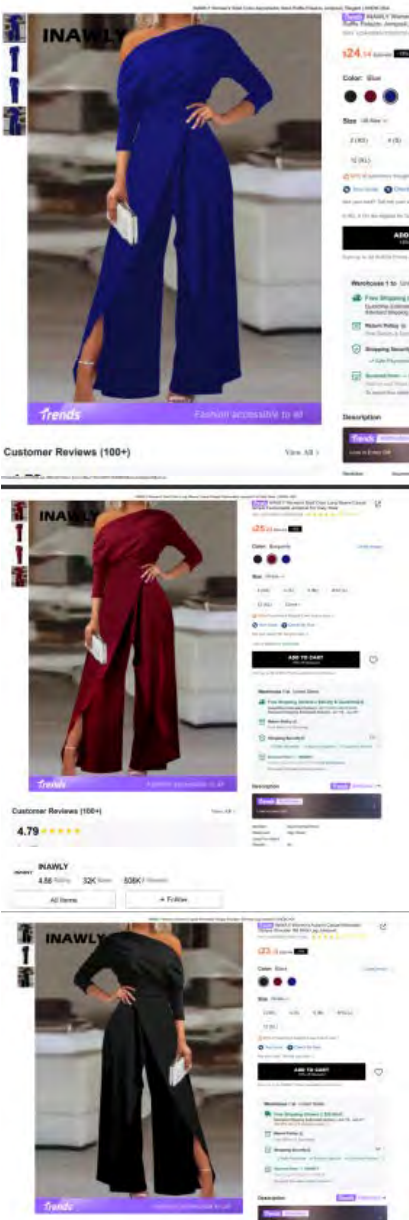
Exhibit 2

Copyrighted Photo	Infringer's Photo	Link to Infringing Photo
 VA0002379930	 	https://us.shein.com/INAWLYWomensFashionCommuterContrastColorPrintBlouse-p-53427804-cat-1733.html?share_from=null&ref=www&rep=dir&ret=us
 VA0002379930	 	https://us.shein.com/INAWLYWomensSummerLeopardPrintV-NeckShortSleeveStraightCasualT-ShirtDress-p-35701382-cat-12478.html?share_from=null&ref=www&rep=dir&ret=us
 VA0002382152	 	https://us.shein.com/INAWLYEuropeanAndAmericanWomenNewArrivalColorBlockSplitHoodedSingle-BreastedDrawstringPulloverCasualSlimFitCurvedLongSleeveHalf-ZipSportsSweatshirtWithPocketsThermalLined-p-46783946-cat-1773.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us
 VA0002382152	 	https://us.shein.com/INAWLYEuropeanAmericanStyleWomenNewYearContrastColorPatchworkHoodedZipperedDrawstringPulloverSportyFittedLongSleeveSweatshirtWithPockets,ThermalLined,LongSleeveTops-p-46783915-cat-1773.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us
	 	https://us.shein.com/INAWLYWomensColorblockDrawstringHoodie,LadiesSpring-FallCasualButton,Drawstring,PocketLongSleeveHoodedRegularFitRegularMulticolorDropShoulderHalfPlacketWomenHoodies,LongSleeveTops-p-27861305-cat-1773.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us

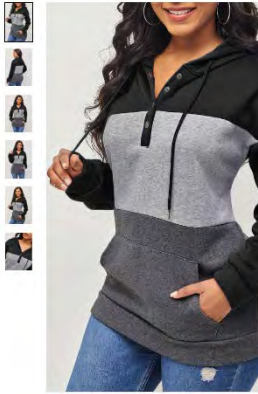
Infringement Evidence INAWLY

Copyrighted Photo	Infringer's Photo	Link to Infringing Photo
 VA0002381192	 Customer Reviews	https://us.shein.com/SHEINEZwearPlusSizeContrastV-NeckLongSleeveT-Shirt-p-25784717-cat-1890.html?share_from=null&ref=www&rep=dir&ret=us
 VA0002381186	 Customer Reviews 5.00	https://us.shein.com/INAWLYWomensCasualV-NeckStripedT-Shirt,SimpleDesign,Spring-Summer-p-58147990-cat-1738.html?share_from=null&ref=www&rep=dir&ret=us
 VA0002379881	 Customer Reviews 4.92	https://us.shein.com/INAWLYPlusSizeWomensFloralHeartPrintMermaidHemDress-p-29207718-cat-1889.html?share_from=null&ref=www&rep=dir&ret=us
 VA0002413197	 Customer Reviews 5.00	https://us.shein.com/INAWLYWomenFrontButtonLongSleeveMinimalistHoodedCasualJacket,DailyWear-p-47471779-cat-1735.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us
 VA0002415185	 Customer Reviews 5.00	https://us.shein.com/INAWLYWomensHolidayCasualColorblockStripedStarPrintTankTop-p-39721837-cat-1779.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us

Hong Kong Leyuzhen Technology Co. Limited v. Shein Distribution Corporation
Infringement Evidence INAWLY

Copyrighted Photo	Infringer's Photo	Link to Infringing Photo
 VA0002381842		https://us.shein.com/WomensSolidColorAsymmetricNeckRufflePalazzoJumpsuit,Elegant-p-50776959-cat-1860.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us https://us.shein.com/INAWLYWomensSolidColorLongSleeveCasualSimpleFashionableJumpsuitForDailyWear-p-50555566-cat-1860.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us https://us.shein.com/INAWLYWomensAutumnCasualMinimalistObliqueShoulderSlitWideLegJumpsuit-p-46658462-cat-1860.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us

Hong Kong Leyuzhen Technology Co. Limited v. Shein Distribution Corporation
Infringement Evidence INAWLY

Copyrighted Photo	Infringer's Photo	Link to Infringing Photo
 VA0002384843	    	https://us.shein.com/INAWLYWomensColorBlockDrawstringHoodedSweatshirt,LongSleeveTops-p-29300278-cat-1773.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us https://us.shein.com/INAWLYWomensColorBlockingHoodedSweatshirtWithDrawstring,LongSleeveTops-p-29285921-cat-1773.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us https://us.shein.com/INAWLYWomensColorblockDrawstringHoodie,LongSleeveTops-p-29285889-cat-1773.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us https://us.shein.com/INAWLYWomensHoodedColorblockFleeceSweatshirt,LongSleeveTops-p-28548714-cat-1773.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us https://us.shein.com/INAWLYWomensColorBlockDrawstringHoodie,LongSleeveTops-p-27862026-cat-1773.html?share_from=null&url_from=GM74164690043&ref=www&rep=dir&ret=us

Hong Kong Leyuzhen Technology Co. Limited v. Shein Distribution Corporation
Infringement Evidence Copyright VA0002379907

EMERY ROSE

Link to Storefront:

https://us.shein.com/store/home?store_code=1929683292&ici=PageGoodsDetail&main_cate_id=1738&main_goods_id=40084844&rule_poskey=DetailShopItemList&src_identifier=on%3Dstore%60cn%3DEMERY%20ROSE%60hz%3D0%60ps%3D1_1%60jc%3DthirdPartyStoreHome_1929683292&src_module=DetailBrand&src_tab_page_id=page_goods_detail1749632793173&tab=items



Plaintiff's Photo



Defendant's Infringing Copies

Links to Infringement:

https://us.shein.com/EMERYROSEWomensCrewNeckLongSleeveContrastLeopardPrintCasualLooseT-Shirt,2In1TeeGraphicCheetahPrintTeesWomenTopsForSpringOutfit-p-40084844-cat-1738.html?share_from=null&ref=www&rep=dir&ret=us

https://us.shein.com/EMERYROSEWomensSolidPatchworkMid-LengthSleeveLeopardPrintCasualTopGraphicCheetahPrintTeesWomenTops-p-38933267-cat-1738.html?share_from=null&ref=www&rep=dir&ret=u

Hong Kong Leyuzhen Technology Co. Limited v. Shein Distribution Corporation
Infringement Evidence Copyright VA0002379907

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SKU: sz2407220372400332      (100+ Reviews)

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Color: Khaki [Large Image](#)



Size US Size 

4 (S) 6 (M) 8/10 (L) 12 (XL)

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4.81     

Overall Fit:

Fit	Percentage
Small	13%
True to Size	86%
Large	1%

No Smell (9) Will Repurchase (1) Good Portability (4)

Keep Warm (4) Fast Logistics (1) Basic (4) Trendy (3)

True to Picture (16) Gorgeous (3) Missing Accessories (2)

c*9** 19 May,2024

Overall Fit: True to Size Height: 146 cm / 57 in Weight: 62 kg / 137 lbs
 Waist: 97 cm / 38 in Hips: 122 cm / 48 in Bust: 110 cm / 43 in
 Color: Green Size: L

I love  this blouse it matches a perfectly





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 **Free Shipping (Orders ≥ \$15.00)** 

Standard Shipping Estimated Delivery: Oct 17 - Oct 23
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Description [Spring/Fall,Square Neck,Contrast Binding](#) 

Size & Fit 

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