

**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-14376-JIC-LKM

Honorable Jeffrey I Cummings

Magistrate Laura K. McNally

**SEALED TEMPORARY RESTRAINING ORDER, ORDER AUTHORIZING
EXPEDITED DISCOVERY, AND ORDER AUTHORIZING ALTERNATE SERVICE
OF PROCESS BY E-MAIL AND/OR ELECTRONIC PUBLICATION**

Plaintiff Shenzhen Peishi Advertising Media Co., Ltd. (“Plaintiff”) filed an *Ex Parte* Motion for Temporary Restraining Order, Including a temporary injunction, asset restraint, expedited discovery and electronic service (the “TRO Motion”), Motion for Expedited Discovery (the “ED Motion”), and Motion for Alternate Service of Process by E-Mail and/or Electronic Publication on Certain Defendants (the “ES 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 TRO Motion, ED Motion, and ES 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 versions of Plaintiff's federally registered U.S. Patent No. 12,324,440 (the "'440 Patent") to residents of Illinois. In this case, Plaintiff has presented screenshot 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 using counterfeit versions of the '440 Patent. See Docket Nos. [1-3 and 2-3], which includes screenshot evidence confirming that each Defendant internet store does stand ready, willing, and able to ship its counterfeit goods to customers in Illinois bearing infringing and/or counterfeit versions of the 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 Declarations of Jennifer Pantuso and Melissa Henderson and 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. Plaintiff is authorized to issue expedited written discovery to Defendants, 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, assets, or other resources 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, TikTok Shop, Temu, Payoneer or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
- d. 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

- e. 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, Payoneer, TikTok Shop, Walmart, Temu, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

2. 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 Temu, eBay Inc., AliExpress, TikTok, 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, including Defendants' sales and listing history related to its respective Online Marketplaces; and

3. 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

sending an e-mail with the documents being served attached to the email to any e-mail addresses provided for Defendants by third parties with the same documents, and electronically publishing a link to the Complaint, this Order, and other relevant documents on a website and by including a link to said website in the service e-mail.

4. 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” 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.

5. 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)

6. Defendants shall not transfer or dispose of any money or other of Defendants’ assets in any of Defendants’ financial accounts.

7. Upon Plaintiff’s request, those with notice of this Order, including the Third Party

Providers as defined in Paragraph 2, 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.

8. 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 ordered by this Court.

9. Plaintiff must provide notice to Defendants of any motion for preliminary injunction as required by Rule 65(a)(1).

10. Plaintiff's Schedule A to the Complaint [Dkt. No.1-1] and other documents already sealed in this case shall remain sealed until further ordered by this Court or until the Order expires, whichever occurs earlier.

11. Within seven (7) calendar days of entry of this Order, Plaintiff shall deposit with the Court Thirty-four Thousand Dollars [\$34,000.00], 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.

12. 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.

This Temporary Restraining Order without notice is entered at 11:00 a.m. on this 17th day of April, 2026 and shall remain in effect for 14 calendar days.


Honorable Judge Jeffrey I. Cummings
United States District Judge

Schedule A

DEFENDANT No.	SELLER NAME	SELLER ID
1	YanzhiJie	A5BKPCGV6URMX
2	Haosailei Store	A68FWNN60THJX
3	CCTVBUY	A26J71PXZ5M2D4
4	TRPYD	A1RAZTRXKKKP7V
5	HEJOHJY® Tech	A39X7N7IM25LRG
6	BLUBLD	A187DBXETT85UB
7	Kusche2024	AD0J6MGU UW0VU
8	KOUARA-US	A31J8PYJ904N8O
9	chunmingXie	A34ZUEJVIZOF51
10	Flux Living	A3GUBTFA48LCXW
11	DISMISSED	DISMISSED
12	FKUFKU-US	A36CQFNEZDSIXT
13	Ayling Pan	A3NDT16YEPEB94
14	DISMISSED	DISMISSED
15	JZsmart	A36UOEBHLEABS3
16	YML US STORE	A2MKNULUG4ZI99
17	Zhuxida shop	A325ZUVV9YHS6H
18	XDTIME	A3KRVAWQ1WD5S H
19	DISMISSED	DISMISSED
20	yisui puus	A3L5F4RJIT9IWV

21	MOMULL	A1F8J4BZ535ASN
22	VGIUB	A9GGSUSJCNLON
23	Charm-Store	A3GNPLAQPR0Z4Q
24	PJWYSHOP	A16TFM2LJ18S6W
25	BeenQ	A2Z0MPWHD4TWOE
26	Yinduz	A1YU4VEUIVHC61
27	zhonghuiying	A3RNPk4GENCTGD
28	zhongxiayue	A1FGBY7BYVJ6NY
29	DISMISSED	DISMISSED
30	DISMISSED	DISMISSED
31	GanZhouShunHaoJianZhuYouXianGongSi	A3U23OYH51V436
32	Grebilux	A2J9E91KB8TEB4
33	UPSPORT Daily Product Shop AEO-US	AA6YU3N632YUL
34	DISMISSED	DISMISSED