

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

HONG KONG LEYUZHEN TECHNOLOGY
CO. LIMITED,

Plaintiff,

v.

INWALY,

Defendant.

Case No.: 1:25-cv-14451

Honorable Sara L. Ellis

Magistrate Jeffrey T. Gilbert

SEALED TEMPORARY RESTRAINING ORDER

Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“PLAINTIFF”) filed an *Ex Parte* Motion for Entry of a Temporary Restraining Order and Other Relief (the “Motion”) against the fully interactive, e-commerce store operating under the seller alias, INAWLY, identified in the Complaint (the “Defendant”) and using at least the domain names identified in the Complaint (the “Defendant Domain Name”) and the online marketplace accounts identified in the Complaint (the “Online Marketplaces”). After reviewing the Motion and the accompanying record, this Court GRANTS PLAINTIFF’s Motion as follows.

This Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendant because Defendant directly targets its business activities toward consumers in the United States, including Illinois. Specifically, PLAINTIFF has provided a basis to conclude that Defendant has targeted sales to Illinois residents by setting up and operating fully interactive online 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 competing products through the use of unauthorized and unlicensed reproductions of Plaintiff’s federally registered Copyright-

Protected Photos under the federal Copyright Registration Numbers: VA0002379881; VA0002379930; VA0002381186; VA0002381192; VA0002381842; VA0002382152; VA0002384843; VA0002413197; and VA0002415185 to residents of Illinois (Doc. Nos. 1-1 and 2-1, Exhibit 1 to the Complaint).

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 Joseph W. Droter and Liangjie Li 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, Defendant could and likely would move any assets from accounts in financial institutions under this Court's jurisdiction to off-shore accounts. Accordingly, this Court orders that:

1. Defendant, its officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be temporarily enjoined and restrained from:

- a. Using PLAINTIFF's Copyright-Protected Photos under the federal Copyright Registration Numbers: VA0002379881; VA0002379930; VA0002381186; VA0002381192; VA0002381842; VA0002382152; VA0002384843; VA0002413197; and VA0002415185 [Doc. Nos. 1-1 and 2-1], including any reproductions, digital copies, print copies, photocopies, colorable imitations, replicas, simulations, mockups, in any format, either physical print or in digital formatting in connection or relation with the distribution, supply, sharing, reproduction, manufacturing, mass production, drop shipping, marketing, advertising, making, offering for sale, or sale of any

competing product that is not a genuine product of PLAINTIFF's or not authorized by PLAINTIFF to be sold in connection with the PLAINTIFF's Copyright-Protected Photos;

- b. passing off, inducing, or enabling others to sell or pass off any competing product as a genuine Plaintiff product or any other product produced by Plaintiff, that is not under the authorization, control, or supervision of Plaintiff or approved by Plaintiff;
- c. committing any acts calculated to lead to the likelihood of confusion among the consumers into believing that Defendant's 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, distributing, in any manner, products or inventory manufactured through the use of PLAINTIFF's Copyright-Protected Photos.

2. Defendant shall not transfer or dispose of any money or other of Defendant's assets in any of Defendant's financial accounts.

3. Upon PLAINTIFF's request, those with notice of this Order, including the Third-Party Providers, including, without limitation, any online marketplace platforms such as SHEIN, eBay, Inc., AliExpress, Alibaba, Amazon.com, Inc., Wish.com, TikTok Shop, Walmart, Temu, and Dhgate (collectively, the "Third Party Providers"), shall within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendant in connection with the unlicensed and unauthorized use of PLAINTIFF's Copyright-Protected Photos.

4. Any Third-Party Providers, including Temu, SHEIN, TikTok Shop, 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 Defendant's seller aliases, including, but not limited to, any financial accounts connected to the information listed in Defendant's Infringement Evidence attached to PLAINTIFF's Complaint [Doc. Nos. 1-2 and 2-2], including 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 order by this Court, or until the expiration of this Order, whichever occurs first.

5. PLAINTIFF may provide notice of the proceedings in this case to Defendant, 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 and by sending an e-mail with a link to said website to the e-mail addresses identified and provided for Defendants by third parties.

6. PLAINTIFF must provide notice to Defendant of any motion for preliminary injunction as required by Rule 65(a)(1).

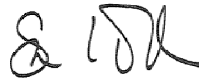
7. Exhibit 2 to the Complaint [Doc. 2-1] and Exhibit 5 to the Declaration of J. Droter [Doc. 14], and this Order shall remain sealed until further order by this Court or until the Order expires, whichever occurs first.

8. Within seven (7) calendar days of entry of this Order, PLAINTIFF shall deposit with the Court Ten Thousand Dollars (\$10,000.00) 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.

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. This Temporary Restraining Order without notice is entered at 11:15 A.M. on this 17th day of December 2025 and shall remain in effect for fourteen (14) calendar days.

A handwritten signature in black ink, appearing to read 'S. L. Ellis', is positioned above a horizontal line.

Sara L. Ellis
United States District Judge