

**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.: 25-cv-14663

Honorable Matthew F. Kennelly

SEALED EX PARTE 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 stores, THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS identified "Schedule A" attached to Plaintiff's Complaint as Exhibit 2 ("Defendants") and using at least the domain names identified in the Complaint (the "Defendants' 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, and for its reasoning states as follows:

Plaintiff is the owner of certain Copyright Protected Images under the federal Copyright Registration Numbers: VA0002379888, VA0002386556, and VA0002413197. A true and copy of Plaintiff's Copyright Registrations are attached to Plaintiff's Complaint as Exhibit 1. Accordingly,

the Court finds that Plaintiff stands a likelihood of success on the merits of its copyright infringement claim for relief.

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 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 Images to residents of Illinois (Dkt. Nos. 1-1 and 2-1, Exhibit 1 to the Complaint). In this case, Plaintiff has presented screenshot evidence that the Defendants' online e-commerce store is operating one or more fully interactive commercial internet stores, reaching out to do business with Illinois residents, publicly displaying unlicensed and unauthorized reproductions of Plaintiff's Copyright Protected Images, and selling competing products, which Illinois residents are able to purchase. See *NBA Properties v. HANWJH*, 46 F.4th 614 (7th Cir. 2022).

The Court additionally finds that issuance of the requested injunctive relief would be in the public interest by protecting consumers from the likelihood of confusion by these online Defendants' e-commerce stores and its public display of the unlicensed and unauthorized reproductions of Plaintiff's Copyright Protected Images. The Court also finds that it need not balance the interests of Defendants in this case as the Plaintiff has presented credible evidence to conclude this online Defendants' e-commerce stores is engaging in, among other things, willful copyright infringement of the Plaintiff's Copyright Protected Images.

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, Liangjie Li, and Anisah Beaston 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. Defendants, their 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 Images under the federal Copyright Registration Numbers: VA0002379888, VA0002386556, and VA0002413197. [Dkt Nos. 1-1 and 1-2], 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 Images;
 - 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 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, distributing, in any manner, products or inventory manufactured through the use of Plaintiff's Copyright Protected Images.
2. Defendants shall not transfer, move, relocate, change accounts, assign, remove, or dispose of any money in the account associated with the domain names identified in the Complaint (the "Defendants' Domain Names") and through the online marketplace accounts identified on the Complaint (the "Online Marketplaces") [1-2] including but not limited to any and all other assets or resources in any and all of Defendants' financial accounts.
3. 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 Defendants' financial accounts, including Defendants' 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, SHEIN, 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 or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
4. Upon Plaintiff’s request, any third party with actual notice of this Order who is providing services for the Defendants, or in connection with any of Defendants’ Online Marketplaces, including, without limitation, any online marketplace platforms such as SHEIN, Alibaba, eBay, Inc., AliExpress, Amazon.com, Inc., Wish.com, TikTok Shop, Walmart, Temu, Payoneer, and Dhgate (collectively, the “Third Party Providers”), shall, within seven (7) calendar days after receipt of such notice, provide to Plaintiff their responses to the Court Ordered 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

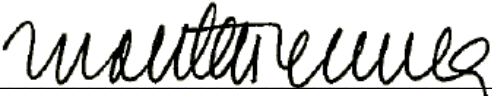
accounts, including Defendants' sales and listing history related to its respective Online Marketplaces; and

- c. any financial accounts owned or controlled by Defendants, including its 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, SHEIN, 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).
5. Upon Plaintiff's request, those with notice of this Order, including the Third-Party Providers as defined in Paragraph 5, shall within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with the unlicensed and unauthorized use of Plaintiff's Copyright Protected Images.
 6. Any Third-Party Providers, including Alibaba, SHEIN, Payoneer, TikTok Shop, PayPal, Alipay, Temu, 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 Defendants' Infringement Evidence attached to Plaintiff's Complaint [Dkt. Nos. 1-2 and 2-2], including any e-mail addresses provided for Defendants by third parties; and
 - b. restrain and enjoin any such accounts or funds from transferring, disposing, relocating, assigning, moving, or any other method of shifting any of the said money or any other

asset or resource of each Defendant until further ordered by this Court, or until the expiration of this court Order, whichever occurs first.

7. PLAINTIFF may provide notice of the proceedings in this case 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 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. Plaintiff shall additionally attach the Complaint, this Order, and all other relevant documents to the email sent with the link to the website.
8. 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” and all other Defendants identified in the Complaint 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.
9. Plaintiff must provide notice to Defendants of any motion for preliminary injunction as required by Rule 65(a)(1).
10. The Pleadings filed in this case, specifically, Docket No. 1 and Docket No. 2, [including Exhibits 1 and 2], Dockets Nos. 4-2 and 4-3, Exhibit 5 to the Declaration of Joseph W. Droter, and this Order shall remain sealed until further order by this Court or until the Order expires, whichever occurs first.

11. Within ten (10) business days of entry of this Order, PLAINTIFF shall deposit with the Court Five Thousand Dollars and Zero Cents (\$5,000.00) 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.
13. This Temporary Restraining Order without notice is entered at 9:30 A.M. on this 5th day of January 2025 and shall remain in effect for fourteen (14) calendar days.



Honorable Matthew F. Kennelly
United States District Judge

Defendant No.	Seller's Name	Link to Seller's Website
2	CORSKI	https://us.shein.com/store/home?store_code=5385839846&ici=PageGoodsDetail&main_cate_id=12478&main_goods_id=42363717&rule_poskey=DetailShopItemList&src_identifier=on%3Dstore%60cn%3DCORSKI%60hz%3D0%60ps%3D1_1%60jc%3DthirdPartyStoreHome_5385839846&src_module=DetailBrand&src_tab_page_id=page_goods_detail1749631168338&tab=items
4	DYDAWN	https://us.shein.com/store/home?store_code=2506678819&main_cate_id=12476&main_goods_id=32308832&src_identifier=on%3Dstore%60cn%3DDYDAWN%60hz%3D0%60ps%3D1_1%60jc%3DitemPicking_undefined&src_module=DetailBrand&src_tab_page_id=page_goods_detail1749622037170&tab=items
6	Fancy Boutique	https://us.shein.com/store/home?store_code=2293809565&main_cate_id=12476&main_goods_id=33135961&src_identifier=on%3Dstore%60cn%3DFancy%20Boutique%60hz%3D0%60ps%3D1_1%60jc%3DitemPicking_undefined&src_module=DetailBrand&src_tab_page_id=page_goods_detail1749624498265&tab=items