

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

SHENZHEN DAISILI COMMERCIAL CO.,  
LTD,

Plaintiff,

v.

RKSTN Fashion,  
d/b/a GuangZhouShiLiQunQiangDian  
ZiShangWuYouXianGongSi

Defendant.

**Case No. 1:25-cv-00820-SLE-BWJ**

**Honorable Sara L. Ellis**

**Magistrate Beth W. Jantz**

**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 by this Court on March 25, 2026 [Dkt. 26], 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 and Declaration of Joseph W. Droter is filed concurrently with this Motion.

DATED: March 31, 2026

Respectfully submitted,

By: /s/ Joseph W Droter  
Joseph W. Droter (Bar No. 6329630)  
**BAYRAMOGLU LAW OFFICES LLC**  
233 S Wacker Drive, 44<sup>th</sup> 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 the 31st day of March 2026, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ Joseph W. Droter  
Joseph W. Droter (IL Bar No. 6329630)

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**Case No. 1:26-cv-00820-SLE-BWJ**

**Honorable Sara L. Ellis**

**Magistrate Beth W. Jantz**

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

Plaintiff, SHENZHEN DAISILI COMMERCIAL CO., LTD. (“Plaintiff”), submits this Memorandum of Law in support of its Motion for Preliminary Injunction (the “Motion”).

**I. INTRODUCTION**

Plaintiff initiated this action against Defendant, RKSTN Fashion, d/b/a GuangZhouShiLiQunQiangDianZiShangWuYouXianGongSi, (“Defendant”), for infringement of United States Copyright Registration No. VA0002422341, (the “Copyright Registration”). As alleged in Plaintiff’s First Amended Complaint [Dkt. 19], Defendant is knowingly and willfully offering for sale, selling, and/or importing into the United States, through the unauthorized use of the Copyright Registration by using Plaintiff’s Copyright Protected Image on their Online Amazon storefront to sell competing inferior products.

**a. Procedural History**

On March 24 and March 25, 2026, this Court granted Plaintiff's Temporary Restraining Order "TRO", Service by Electronic Service, and Expedited Discovery request on an *ex parte* basis [Dkts. 25, 26]. Plaintiff effectuated service on Defendant March 31, 2026. [Dkt. 29].

Substantively, the TRO, authorized and directed Plaintiff to provide notice of these proceedings, and the TRO required Plaintiff to provide notice of any preliminary injunction hearing to Defendant 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 Defendant by third parties with the service documents attached in PDF format. Plaintiff effectuated electronic service on Defendant [Dkt. 29] after receiving the issued summons from the court. (Droter Decl. ¶ 6).

Based on the foregoing procedural history, including having effectuated electronic service of process on the Defendant as required by the TRO, Plaintiff respectfully requests the Court now enter a Preliminary Injunction in this matter. Plaintiff further requests, if needed, the Court issue a Minute Order setting a deadline for Defendant to submit any opposition to the Motion. Plaintiff will immediately serve Defendant electronically with the requested Minute Order once if 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 Defendant. To date, similar plaintiffs have presented virtually identical grounds for the issuance of preliminary injunctive relief addressing allegations of Internet-based copyright infringement to sell competing goods, and such relief has been granted, by the court in this judicial district. See, e.g., *Wumei Lin v. Hong Kong Jibi Limited*, Case No. 1:25-cv-12390, Dkt. No. 35 (Chang, 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 Defendant. 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, 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 2 to the First Amended Complaint [19-2], the memorandum in support of Plaintiff’s renewed motion for TRO [Dkt. 21-1] with the submission of the motion for TRO [Dkt. 21], and by this Court’s entry of the TRO [Dkt. 26] the above requirements for entry of a preliminary injunction have been satisfied. The record establishes that through Defendant’s illegal operations, Defendant has infringed upon Plaintiff’s Federally Registered Copyright. 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 \$10,000.00 in connection with issuance of the TRO [26 ¶ 8]. 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 Defendant to oppose the Motion and set a hearing on same can be issued, which Plaintiff will immediately serve Defendant 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: March 31, 2026

Respectfully submitted,

By: /s/ Joseph W. Droter  
Katherine M. Kuhn (IL Bar No. 6331405)  
Joseph W. Droter (IL Bar No. 6329630)  
**BAYRAMOGLU LAW OFFICES LLC**  
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Chicago, IL 60606  
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Katherine@bayramoglu-legal.com  
Joseph@bayramoglu-legal.com  
*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31st day of March 2026, 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**  
233 S. Wacker Drive, 44<sup>th</sup> Floor, #57  
Chicago, IL 60606  
Tel: (702) 462-5973 | Fax: (702) 553-3404  
Joseph@bayramoglu-legal.com  
*Attorneys for Plaintiff*

# Exhibit 1

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

Wumei Lin,

Plaintiff,

v.

HONG KONG JIBI LIMITED,

Defendant.

**Case No. 1:25-cv-12390-EEC-LKM**

**Honorable Edmond E. Chang**

**Magistrate Laura K. McNally**

**PRELIMINARY INJUNCTION ORDER**

Plaintiff Wumei Lin (“Plaintiff”) filed a Motion for Entry of a Preliminary Injunction against the Defendant, HONG KONG JIBI LIMITED and its fully interactive, e-commerce stores<sup>1</sup> operating under the seller alias(es) identified in Exhibit 2 to the First Amended Complaint and attached hereto (“Defendant”) and using at least the domain names identified in Exhibit 2 (the “Defendant Domain Name”) and the online marketplace account identified in Exhibit 2 (the “Online Marketplaces”). After reviewing the Motion and the accompanying record, this Court GRANTS Plaintiff’s Motion in part as follows.

This Court finds Plaintiff has provided notice to Defendant in accordance with the Temporary Restraining Order entered November 21, 2025, [Dkt. No. 24] (“TRO”), and Federal Rule of Civil Procedure 65(a)(1).

This Court also 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 at least

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<sup>1</sup> The e-commerce store urls are listed on Exhibit 2 hereto under the Online Marketplaces.

one e-commerce stores, Gkfxvkq that target United States consumers using one or more seller aliases, offer shipping to the United States, including to the State of Illinois, and have sold products through the unauthorized use and display of Plaintiff's federally registered Copyright (the "Plaintiff's Copyright Registration") to residents of the State of Illinois. [Dkt. No. 17-1], which includes Plaintiff's Copyright VA0002412626. In this case, Plaintiff has also presented evidence that the Defendant's 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 unauthorized use and display of Plaintiff's Copyright. *See* Docket No. 17- 2, which includes evidence confirming that Defendant's e-commerce store does stand ready, willing and able to ship its goods to customers in Illinois using the unauthorized use and display of Plaintiff's Copyright.

This Court also finds that the injunctive relief previously granted in the 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 TRO 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 Copyright, (2) Defendant makes, uses, offers for sale, sells, and/or imports into the United States for subsequent sale or uses knock-off products that infringes directly and/or indirectly Plaintiff's federally registered Copyright and (3) an ordinary observer would be deceived into thinking the images were the same as Plaintiff's federally registered Copyright. Furthermore, Defendant's

continued, and unauthorized use of Plaintiff's federally registered Copyright 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 Defendant's actions. 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 preliminarily enjoined and restrained from:

- a. Using or displaying the Plaintiff's Copyright under the federal Copyright Registration Number, VA0002412626, 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 Copyright product or is not authorized by Plaintiff to be sold in connection with the Plaintiff's Copyright;
- 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 Copyright.
- c. committing any acts calculated to cause consumers to believe 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, 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 Copyright.

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, Defendant and any third party with actual notice of this Order who is providing services for any of Defendants, or in connection with any of Defendant's Online Marketplaces, including, without limitation, any online marketplace platforms such as eBay, Inc., AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc., ContextLogic Inc. d/b/a Wish.com ("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:

4. Upon Plaintiff's request, those with notice of this Order, including the Third Party Providers such as, eBay, Inc., AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc., ContextLogic Inc. d/b/a Wish.com ("Wish.com"), 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 Defendants in connection with the sale of counterfeit and infringing goods using the Plaintiff's Copyright.

5. 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 Defendant's seller aliases, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, any e-mail addresses provided for Defendant by third parties; and

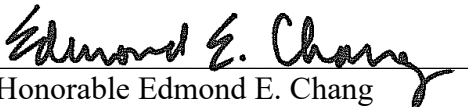
- b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendant's assets until further order by this Court.

6. Plaintiff may provide notice of the proceedings in this case to Defendant, including service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Pleadings, 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 provided for Defendants by third parties. The Clerk of the Court is directed to issue a single original summons in the name of "HONG KONG JIBI LIMITED" that shall apply to Defendant. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendant receive from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendant of the pendency of the action and afford them the opportunity to present their objections.

7. 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.

8. The \$1,000 bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

9. This Preliminary Injunction Order is entered at 3:00 p.m. on this 8<sup>th</sup> day of December 2025.

  
Honorable Edmond E. Chang  
United States District Judge

HONG KONG JIBI LIMITED dba Gkfxvkq  
*jzhongshengzhi2024@163.com*

**Store ID:**

[https://www temu.com/gkfxvkq-m-634418219980101.html?goods\\_id=601100124113832&sticky\\_type=3&x\\_sessn\\_id=quhkymuhku&refer\\_page\\_%E2%80%A6=](https://www temu.com/gkfxvkq-m-634418219980101.html?goods_id=601100124113832&sticky_type=3&x_sessn_id=quhkymuhku&refer_page_%E2%80%A6=)

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**Honorable Sara L. Ellis**

**Magistrate Beth W. Jantz**

**DECLARATION OF JOSEPH W. DROTER, ESQ.**  
**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 Shenzhen Daisili Commercial Co., Limited ("Plaintiff"). I make this declaration from my matters within my own personal knowledge unless stated otherwise.

4. Plaintiff's Motion for Temporary Restraining Order (the "TRO") was entered by this Court on March 25, 2026 [Dkt. 26].

5. The designated online platform, Amazon, (the "Platform") provided Plaintiff with the email addresses of Defendant on March 30, 2026, so that electronic service of process authorized under the TRO could be effectuated.

6. On March 31, 2026, after receiving the summons from the clerk's office, Plaintiff effectuated electronic service of process on Defendant.

7. 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.

Executed on March 31, 2026, in Chicago, Illinois.

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

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31st day of March 2026, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ Joseph W. Droter  
Joseph W. Droter (IL Bar No. 6329630)