

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

PAWESOME PET PRODUCTS LLC, *et al.*,

Plaintiffs,

v.

COLORFLOWERS, *et al.*,

Defendants.

Civil Action No.

FILED UNDER SEAL

[PROPOSED] 1) TEMPORARY RESTRAINING ORDER; 2) ORDER RESTRAINING ASSETS AND MERCHANT STOREFRONTS; 3) ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE; AND 4) ORDER AUTHORIZING EXPEDITED DISCOVERY¹

This matter is before the Court upon Plaintiffs' *Ex Parte* Application for the following: 1) a temporary restraining order; 2) an order restraining assets and Merchant Storefronts (as defined *infra*); 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against the Defendants identified on **Schedule "A"** to the Complaint and attached hereto (collectively, the "Defendants"). The Court has considered the Application, the evidence in the record, and the applicable law.

By the instant Application, Plaintiffs Pawesome Pet Products LLC and Cindy Ghukasyan move *ex parte* pursuant to 35 U.S.C. § 283, Federal Rules of Civil Procedure 64 and 65, and The All Writs Act, 28 U.S.C. § 1651(a), for entry of a temporary restraining order and an order restraining assets and Merchant Storefronts, for violations of the Patent Act. Because Plaintiffs

¹ This proposed Order includes this Court's prior modifications as used in the related cases. *See, e.g., Doggie Dental Inc. et al. v. AvantDigital et al., 21-cv-565-MRH* (W.D. Pa., filed April 29, 2021) and *Doggie Dental Inc. et al. v. CDOoffice et al., 21-cv-271-MRH* (W.D. Pa., filed February 25, 2021).

have satisfied the requirements for the issuance of a temporary restraining order, the Court grants Plaintiffs' Application.

FACTUAL FINDINGS & CONCLUSION OF LAW

1. Plaintiffs Pawesome Pet Products LLC ("Pawesome") and Cindy Ghukasyan ("Ghukasyan"), are likely to prevail on their Patent Act claim at trial, and that there is a substantial basis to support each of the below findings.

2. Petros Dertsakyan is the inventor of the BRISTLY[®] dog toothbrush ("Plaintiffs' Product"). Ghukasyan is the owner of intellectual property related thereto; Pawesome is the exclusive licensee of such intellectual property.² Plaintiffs' Product is a unique and revolutionary product sold under the BRISTLY[®] trademark ("Plaintiffs' Mark") that safely and easily permits dogs to brush their own teeth removing plaque and tarter ("Plaintiffs' Product").

3. Ghukasyan is the owner of U.S. Trademark Registration No. 5,815,298 for BRISTLY directed to "Non-medicated dental preparations for pets, namely, toothpaste and preparations for removing plaque; Home dental care products for dogs and cats, namely, toothpaste; Dental care and oral hygiene products for pets, namely, tooth cleaning preparations; Non-edible dental chews for pets; Non-medicated oral dental chews for dogs."

4. Ghukasyan is the owner of U.S. Trademark Registration No. 5,844,832 for BRISTLY directed to "Toothbrushes for animals; Toothbrushes for pets; Home dental care products for dogs and cats, namely, toothbrush."

² Cindy Ghukasyan acquired the Intellectual Property from Petros Dertsakyan. Doggie Dental, Inc. was the former exclusive licensee of the Intellectual Property. Together, Petros Dertsakyan and Doggie Dental, Inc. brought multiple lawsuits related to the facts and claims in this lawsuit and are the predecessors in interest to this lawsuit.

5. Ghukasyan is the owner of U.S. copyright registration VA 2-122-455 directed to various photographs related to the BRISTLY[®] dog toothbrush (the “Plaintiffs’ Works”).

Ghukasyan is also the owner of unregistered copyrights related to the Plaintiffs’ Product.

6. In addition, Ghukasyan is also the owner of various design patent applications directed to the BRISTLY[®] dog toothbrush, including an issued European Registered Community Design (005818606-0001), U.S. design patent D 901104, and a pending Chinese design patent application.

7. Ghukasyan is the owner of U.S. Patent No. 10,477,838 for “Pet chew toy for dental self-cleaning by domestic pets” (Plaintiffs’ Patent” or “the ‘838 Patent”).

8. Defendants, by operating Internet based e-commerce stores, and fully interactive, commercial Internet websites operating under Defendants’ respective seller identities set forth on Schedule “A” hereto (the “Seller IDs”), have advertised, promoted, sold, and offered for sale that Plaintiffs have determined are not genuine BRISTLY[®] products and infringe at least one claim of the ‘838 patent.

9. Through the e-commerce marketplace platform, Plaintiffs accessed all of the e-commerce stores operating under Defendants’ Seller IDs and captured the Defendants’ listings at issue on the e-commerce stores. At the conclusion of the process, the detailed webpages and photographs were inspected by Plaintiffs’ representative who confirmed that each Defendant is offering for sale products and infringe upon at least one claim of the Plaintiffs’ Patent (“Infringing Products”).

10. Plaintiffs, as well as consumers and animal owners, are likely to suffer immediate and irreparable losses, damages and injuries before Defendants can be heard in opposition,

unless Plaintiffs' Application for *ex parte* relief is granted. There is good cause to believe that the unauthorized and unlicensed offering for sale and sale of Infringing Products will continue in the marketplace; while consumers are likely to be misled, confused, and disappointed by the quality of the products so advertised, and that Plaintiffs may suffer loss of sales for their genuine products and an unnatural erosion of the legitimate marketplace in which they operate. There is also good cause to believe that if Plaintiffs proceed on notice to Defendants of this Application, Defendants can easily and quickly change the ownership or modify e-commerce store account data and content, change payment accounts, redirect consumer traffic to other seller identification names, and transfer assets and ownership of Seller IDs, thereby thwarting Plaintiffs' ability to obtain meaningful relief. As other courts have recognized, proceedings against those who deliberately traffic in infringing merchandise are often useless if notice is given to the adverse party.

11. The balance of potential harm to Defendants of being prevented from continuing to profit from their illegal and infringing activities if a temporary restraining order is issued is far outweighed by the potential harm to Plaintiffs, their reputation, and their goodwill as a manufacturer and distributor of quality products, if such relief is not issued.

12. The public interest favors issuance of the temporary restraining order in order to protect Plaintiffs' interests and protect the public from being deceived and defrauded by the passing off of Defendants substandard goods as Plaintiffs' genuine goods.

13. Under Pennsylvania law this Court may issue a prejudgment asset restraint where Plaintiff's complaint asserts a claim for money damages.³ Therefore, this Court has the authority

³ Under Pennsylvania law, pre-judgment restraints are permitted as against all defendants. *Walter v. Stacey*, 837 A.2d 1205 (Pa. Super. 2003) (injunction entered restraining assets in action seeking damages for a wrongful death); *Hoxworth v. Blinder, Robinson & Co., Inc.*, 903 F.2d 186 (3d Cir. 1990) (affirming injunction entered restraining

to grant Plaintiffs' request for a prejudgment asset freeze to preserve the relief sought by Plaintiffs and preserve the Defendants' ability to at least partially satisfy a judgment.

14. Similarly, if Defendants are given notice of the Application, they are likely to destroy, move, hide or otherwise make inaccessible to Plaintiffs the records and documents relating to Defendants' illegal and infringing activities. Therefore, Plaintiffs have good cause to be granted expedited discovery.

ORDER

Based on the foregoing findings of fact and conclusions of law, Plaintiffs' Application is hereby **GRANTED** as follows (the "Order"):

I. Temporary Restraining Order

A. IT IS HEREBY ORDERED, as sufficient cause has been shown, that each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active

assets in class action lawsuit). Plaintiff's pre-filing investigation indicated that AIMDOME, DAILYITEMSS, INC, NANDAFER, PAWFECTDEPOT, PETFITT, PUSHMYCART, SILVA SHOP, 4ONTHERRUN, ANGELA_HFF78, APPREZMEDIA, ARELYANGELLAURENT, AVERHAYE-0, BEAUTY.BOX, BELLAS_PAWTIQUE, BESTONLINESHOPS, BETOCORONA37, DANTRESS, DAYTON_OHIO, DEDAGIRL, DJPETSTORE, DMG30, DTMGOODS, EDINESSBOSS, EUPHORIAHM, FOREVERYOUNG377, GITTERM123, GNDEALZ, GOODEDEALSNOGALES, HAPPLYONEDAY, HOW-1514, IDYDZ_ACCESSORIES, IIX_TREAM, ILUZION69, JACBO_9711, JB2010-2012, JENNLYNNE2, JOSHBOYSGAMING, JSGM17, JTAYLOR3344, KATJUUS, KEITHBATES2012, MEBR007, MIAMI98, MINAUDAS, MUCERIO7788, MUSTANG692010, NICS_NAXX, NIGHACOLLECTION, NOTW92345, PALPLAZA, PEACEFUL62, PRIMETIME_DISTRIBUTION, PRIMETIMEDISTRIBUTION94, PRINCESSX4, PROGUNZXZ, RSCHLAPP, SAVAGLO-15, SCRAGGY99, SHELLBEA1, SLICKZTHINGS4U, SMARTGOALS, SOLETGO, STEVENATIN-0, SUAZNAVARSHOP, TEXMEDUSA, TWELVE*29, VICKIE7772, WA321849, may be U.S.-based. Pre-judgment restraints are appropriate against these U.S. sellers under *Walter and Hoxworth*. See also, *Doggie Dental Inc. et al. v. AvantDigital et al.*, 21-cv-565-MRH (W.D. Pa., filed April 29, 2021) and *Doggie Dental Inc. et al. v. CDOoffice et al.*, 21-cv-271-MRH (W.D. Pa., filed February 25, 2021). *Doggie Dental Inc. v. Go Well*, No. 19-cv-1282 (W.D. Pa. Oct. 11, 2019) (Hornak, J.) (sellers on amazon.com); *Doggie Dental Inc. v. Worthbuyer*, No. 19-cv-1283 (W.D. Pa. Oct. 11, 2019) (Hornak, J.) (sellers on ebay.com); *Doggie Dental Inc. v. Max_Buy*, No. 19-cv-746 (W.D. Pa. June 27, 2019) (Hornak, J.) (sellers on ebay.com); *Doggie Dental Inc. v. Anywill*, No. 19-cv-682 (W.D. Pa. June 13, 2019) (Hornak, J.) (sellers on amazon.com); *Airigan Solutions, LLC v. Abagail*, No. 19-cv-503 (May 28, 2019) (Fischer, J.) (sellers on amazon.com); *Airigan Solutions, LLC v. Babymove*, No. 19-cv-166 (W.D. Pa. Feb. 14, 2019) (Fischer, J.) (sellers on amazon.com); *Airigan Solutions, LLC v. Artifacts_Selling*, No. 18-cv-1462 (W.D. Pa. Oct. 31, 2018) (Fischer, J.) (sellers on ebay.com and aliexpress.com).

concert or participation with any Defendant having notice of this Order are hereby restrained as follows:

- (1) from (a) their unauthorized and unlicensed use of Plaintiffs' Patent, distribution, marketing, advertising, offering for sale, or sale of any Infringing Products; and (b) shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner products that infringe upon at least one claim of the Plaintiff's Patent;
- (2) from secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with any computer files, data, business records, documents or any other records or evidence relating to their User Accounts,⁴ Merchant Storefronts⁵ or any money, securities or other property or assets of Defendants (hereinafter collectively referred to as "Defendants' Assets");
- (3) effecting assignments or transfers, forming new entities or associations, or creating and/or utilizing any other platform, User Account, Merchant Storefront or any other means of importation, exportation, advertising, marketing, promotion, distribution, and/or display for the purposes of circumventing or otherwise avoiding the prohibitions set forth in this Order;

⁴ As defined in the Application, a "User Account" is, as defined in the Complaint, any and all accounts with online marketplace platform(s) Amazon.com, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all other persons in active concert with any of them.

⁵ As defined in the Application, a "Merchant Storefront" is any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in products which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them.

- (4) each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order shall immediately offering for sale the Infringing Products within metatags or other markers within website source code, from use on any web page (including as the title of any product listing), from any advertising links to other websites, from search engines' databases or cache memory, and any other form of use such terms or works which is visible to a computer user or serves to direct computer searches to Internet based e-commerce stores owned, or operated by each Defendant, including the Merchant Storefronts operating under the Seller IDs;
- (5) each Defendant shall not transfer ownership of the User Accounts or Merchant Storefronts associated with the Seller IDs;
- (6) each Defendant shall preserve copies of all computer files relating to the use of any User Accounts and/or Merchant Storefronts under the Seller IDs and shall take steps necessary to retrieve computer files relating to the use of the User Accounts and/or Merchant Storefronts under their Seller IDs that may be deleted before the entry of this Order;
- (7) upon receipt of notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to Alibaba.com US LLC d/b/a Aliexpress.com ("Aliexpress"), Amazon.com, Inc. and its affiliate, Amazon Services LLC d/b/a Amazon.com ("Amazon"), eBay, Inc. d/b/a eBay.com ("eBay"), and Context Logic, Inc d/b/a wish.com ("Wish") ("Third Party Service Provider(s)") and Zhejiang Ant Small and Micro Financial Services Group Co., Ltd. AliPay (China) Internet Technology Co. Ltd.,

and Alipay.com Co., Ltd. (collectively referred to as “AliPay”)⁶, Amazon Payments, Inc. d/b/a pay.amazon.com, and PayPal, Inc. d/b/a paypal.com (“PayPal”) (“Financial Institution(s)”), and their related companies and affiliates, shall immediately identify and restrain all funds, as opposed to ongoing account activity, in or which are hereafter transmitted into the accounts related to the Defendants as identified on Schedule “A” hereto, as well as all funds in or which are transmitted into (i) any other accounts of the same customer(s); (ii) any other accounts which transfer funds into the same financial institution account(s), and/or any of the other accounts subject to this Order; and (iii) any other accounts tied to or used by any of the Seller IDs identified on Schedule “A” hereto;⁷

(8) upon receipt of notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to the Third Party Service Provider(s) and the Financial Institution(s), shall immediately divert to a holding account for the trust of the Court all funds in or which are hereafter transmitted into all accounts related to Defendants identified in Schedule “A” hereto, and associated payment accounts, and any other accounts for the same customer(s) as well as any other accounts which transfer funds into the same financial institution account(s) as any other accounts subject to this Order;

(9) The Third Party Service Provider(s) and Financial Institution(s) shall further, within five (5) business days of receiving this Order, provide Plaintiffs’ counsel with all data that details (i) an accounting of the total funds restrained and identifies the financial

⁶ WorldPay US, Inc. (“WorldPay”) processes transactions on behalf of Alibaba and Alipay, which may appear as “Aliexpress” on a cardholder’s credit card statement.

⁷ This Order contemplates that discovery may reveal that Defendants may have other user accounts operated by other Third Party Service Providers and Financial Institutions and that the additionally discovery Third Party Service Providers and Financial Institutions, once identified and provided with notice, shall also be subject to the discovery, restraints and injunctions set forth in this Order.

account(s) which the restrained funds are related to, and (ii) the account transactions related to all funds transmitted into financial account(s) which have been restrained. Such restraining of the funds and the disclosure of the related financial institution account information shall be made without notice to the account holders, until after those accounts are restrained. No funds restrained by this Order shall be transferred or surrendered by any Third Party Service Provider or Financial Institution for any purpose (other than pursuant to a chargeback made pursuant to that Third Party Service Provider or Financial Institution's security interest in the funds) without express authorization of this Court;

(10) Upon Plaintiffs' request, any Internet marketplace who is provided with notice of this Order, including but not limited to the Third Party Service Provider(s) and Financial Institution(s), shall immediately cease fulfillment of and sequester Defendants' inventory assets corresponding to the Seller IDs identified on Schedule "A" hereto in its inventory, possession, custody, or control, and hold such goods in trust for the Court during pendency of this action;

(11) this Order shall apply to the Seller IDs, associated Accounts and Merchant Storefronts, and any other seller identification names, Accounts or Merchant Storefronts, Third Party Service Provider or Financial Institution accounts which are being used by Defendants for the purpose of infringing on at least one claim of the Plaintiffs' Patent;

(12) Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to the Third Party Service Provider(s) and the Financial Institution(s), subject to this Order may petition the Court to modify the asset restraint set out in this Order; and

(13) this Order shall remain in effect until the date for the hearing to show cause why a preliminary injunction should not be issued as set forth below, or until such further dates as set by the Court or stipulated by the parties.

B. IT IS HEREBY ORDERED, as sufficient cause has been shown, that upon Plaintiffs' request, any Internet marketplace who is provided with notice of this Order, including but not limited to the Third Party Service Providers and Financial Institutions, is hereby restrained and enjoined from engaging in any of the following acts or omissions pending the hearing and determination of Plaintiffs' Application for a preliminary injunction, or until further order of the Court:

(1) secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying Defendants' Assets from or to financial accounts associated with or utilized by any Defendant or any Defendant's User Accounts or Merchant Storefront(s) (whether said account is located in the U.S. or abroad) ("Defendants' Financial Accounts") until further ordered by this Court; and

(2) within (5) days after receiving notice of this Order, providing services to Defendants, Defendants' User Accounts and Defendants' Merchant Storefronts, including, without limitation, continued operation of Defendants' User Accounts and Merchant Storefronts, and any other listings linked to the same sellers or linked to any other alias seller identification names being used and/or controlled by Defendants.

C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that, upon Plaintiffs' request, within no later than five (5) calendar days of Plaintiffs' request:

(1) Amazon is ordered to remove any seller identified by Plaintiffs from the following Amazon Standard Identification Numbers (ASINs): B075KYV2DT (small BRISTLY[®]), B075L4L1T2 (medium BRISTLY[®]), and B075KTSHRT (large BRISTLY[®])⁸;

(2) Amazon is ordered to suspend any ASIN listing product that Plaintiffs assert infringes at least one claim of the Plaintiffs' Patent, and is identified as originating outside of the United States (i.e., any seller is prevented from listing for sale under the identified ASIN); and

(3) Amazon is ordered to suspend any ASIN that was associated with a product already identified by prior Order of this Court in the present lawsuit to be Counterfeit, Infringing, or unfairly competing, as designated in the Schedule A third column under "**Amazon ASIN Number(s)**" (i.e., any seller is prevented from listing for sale under the identified ASIN);

(4) The Plaintiffs have demonstrated that the following products as pictured in the attached **Schedule "B"** are either made, used by, offered for sale or sold into the United States contain every element or equivalent of at least one claim of the Plaintiff's Patent; consequently, all online marketplaces, including but not limited to, amazon.com, ebay.com, aliexpress.com, and wish.com, shall upon receipt of this Order, suspend, block, tombstone, and/or delete any and any product listings identified by the Plaintiff as either identical or substantially similar, to the above-described products in **Schedule "B"**, whether sold by the Defendant or other persons or entities.

II. Order to Show Cause Why a Preliminary Injunction Should Not Issue and Service of Order

A. Defendants are hereby ORDERED to show cause before this Court in the United States District Court for the Western District of Pennsylvania, via ZoomGov videoconference , on the

⁸ These are the current ASINs assigned to the Plaintiffs' Products by Amazon.

___ day of _____, 2022, at _____ .m. or at such other time that this Court deems appropriate, why a preliminary injunction, pursuant to FRCP 65(a), should not issue.

Defendants are on notice that failure to appear at the hearing may result in the imposition of a preliminary injunction against them.

B. Opposing papers, if any, shall be filed electronically with the Court and served on Plaintiffs' counsel by delivering copies thereof to the office of Ference & Associates LLC at 409 Broad Street, Pittsburgh, Pennsylvania 15143 before _____, 2022. Plaintiffs shall file any Reply papers on or before _____, 2022.

C. After Plaintiffs' counsel has received confirmation from the Third Party Service Providers and Financial Institutions or otherwise, regarding the restraint of funds directed herein, Plaintiff's counsel shall file notice of such confirmation on the docket under seal without the need for redaction within twenty-four (24) hours of the receipt of confirmation. Additionally, after receiving the aforementioned confirmation regarding restraint of funds, Plaintiffs shall serve copies of the Complaint, the Application, this Order, and any Discovery on each Defendant via their corresponding email/online contact form provided on the Internet based e-commerce stores operating under the respective Seller IDs, or by providing a copy of this order by e-mail to the marketplace platform, which in turn notifies each Defendant of the Order, or by other means reasonably calculated to give notice which is permitted by the Court, or as otherwise directed by this Court. In addition, Plaintiffs shall post copies of the Complaint, Application, this Order, any Discovery, and all other pleadings and documents filed in this action on a website designated by Plaintiffs,⁹ and shall provide the website address to Defendants via e-mail/online contact form,

⁹ Rule 65 has been interpreted to require that a party have notice of the motion and hearing; perfecting service on a defendant is not a prerequisite to the entry of a preliminary injunction order. *Pate v. Gov't of the Virgin*

and such notice so given shall be deemed good and sufficient service thereof. Plaintiffs shall continue to provide notice of these proceedings and copies of the documents on file in this matter to Defendants by regularly updating the website designated by Plaintiffs or by other means reasonably calculated to give notice which is permitted by the Court.

III. Order Authorizing Expedited Discovery

A. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- (1) Plaintiffs may propound interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall provide written responses under oath to such interrogatories within fourteen (14) days of service to Plaintiffs' counsel.
- (2) Plaintiffs may serve requests for the production of documents pursuant to FRCP 26 and 34, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall produce all documents responsive to such requests within fourteen (14) days of service to Plaintiffs' counsel.
- (3) Plaintiffs may serve requests for admissions pursuant to FRCP 26 and 36, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall provide written responses under oath to such requests within fourteen (14) days of service to Plaintiffs' counsel.

Islands, 2015 WL 1937701 n.9 (VI Sup. Ct. April 17, 2015); *Corrigan Dispatch Co. v. Casa Guzman, S.A.*, 569 F.2d 300, 302 (5th Cir. 1978).

B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within fourteen (14) days of receiving actual notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to the Third Party Service Provider(s) and the Financial Institution(s), shall provide to Plaintiffs' counsel all documents and records in their possession, custody or control (whether located in the U.S. or abroad) relating to Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, documents and records relating to:

- (1) any and all User Accounts and Defendants' Merchant Storefronts and account details, including, without limitation, identifying information and account numbers for any and all User Accounts and Defendants' Merchant Storefronts that Defendants have ever had and/or currently maintain with the respective Third Party Service Provider;
- (2) the identities, location and contact information, including any and all e-mail addresses of Defendants that were not previously provided;
- (3) the Defendants' methods of payment, methods for accepting payment and any and all financial information, including, but not limited to, information associated with Defendants' User Accounts and Defendants' Merchant Storefronts, a full accounting of Defendants' sales history and listing history under such accounts and Defendants' Financial Accounts associated with Defendants' User Accounts and Defendants' Merchant Storefronts; and
- (4) Defendants' unauthorized and unlicensed use of Plaintiffs' Patent.

V. Security Bond

IT IS FURTHER ORDERED that Plaintiffs shall place security (corporate surety bond, cash, certified check, or attorney’s check) in the amount of \$ _____ Dollars (_____) with the Court, which amount is determined adequate for the payment of any damages any person may be entitled to recover as a result of an improper or wrongful restraint ordered hereunder.

VI. Summons

IT IS FURTHER ORDERED that the Clerk of the Court shall issue a single original summons in the name of “COLORFLOWERS and all other Defendants identified in the Complaint” that will apply to all Defendants. Plaintiffs shall give notice (via electronic means) of this Order, all other Orders entered at anytime in this case, and all pleadings and papers in this action to all entities set out in Paragraph I(A)(7) above, and shall give notice by authorized service of this Order, all other Orders, and all papers in this case to all Defendants within twenty-four (24) hours of notice that all relevant accounts have been frozen.

SO ORDERED.

SIGNED this _____ day of May, 2022, at _____ .m.
Pittsburgh, Pennsylvania

MARK R. HORNAK
CHIEF UNITED STATES DISTRICT JUDGE

Schedule “A”

Defendants With Store Name and Seller ID

Defendant No.	Defendant/Store Name	Seller ID
1	COLORFLOWERS	A1CHEEQYGH8Y7I
2	A Inc	A3AUAZULT1L0G2
3	Aimdome	AB0JMVSVZ17DT
4	AMVEEDI	A3UL8PHXCHN7XR
5	Arestle Housewares	A2DQX4Y2AU5NFJ
6	Beshil	A1KATZXUD30X3X
7	BESTZYKJ	A6PTV1WFHC9KH
8	CHOUYUN	A4QI01VXT31RA
9	CHPODOO	A114HQGLDP5A2Q
10	Dailyitemss, Inc	A1VVNHE3Z24MN6
11	Dbzon	A18VWAUVNOAE1
12	dongguan shi shengke Technology Co., Ltd	AT55CQEWGG2X3
13	dplight	ANHVFG4Y08LUG
14	Fairycity	A1HXMMC8GQQ6HS
15	Flosik Toys	A3I4ISVGANTN01
16	Hshen	A2LQZW00C1HYQS
17	isenvo	A1NJGTQ24P9YM9
18	JAFVN FASHION	A34VQAVJCFH383
19	JiaYongJingMaoYouXianGongSi	A1IIAYXJJIBWFY
20	JoyofRelax	A12MBQBDGWESEQ
21	KingworaUS	A38ATRQ77SF83A
22	LiCraft US	A30110U88FHO2F
23	Lovfu	A17K815AD9ZTTC
24	Man Rui Department Store	A317OYCBPDILQD
25	MansWill	A392PFRJYHJ3WU
26	MIXX LABORATORY	A300MRWY3USLLF
27	MUJOUTDAY	A3F2S6YGW17B0G
28	NandaFer	A2EWQ42MAZ6IAP
29	nfddizayn	A2OK7J218QCUWB
30	PawfectDepot	A1P3UMLNCKPJL3
31	petfitt	A2NWIT8X6XNHXK
32	PETHOBBY RJ-shop	A9QHHC9N68KZV
33	PushMyCart	A2Q5N56LJMFPC

34	ruidaxinxi	A2XNFLPPC13FEP
35	sankaragi-one	A1Z8T8Y2B8SVTU
36	shangkexinriyong	A3SRYQ8VZ22XJT
37	Sigoly	A3K6CJL6YEJSOG
38	Silva shop	AHVEPKDQOOQLS
39	situo	A29OZITDKFQWF2
40	SONGWAY Pet	A33EWE5YZEAYTR
41	sunneli	AN5Q1N46JVHOC
42	Tangnert	A5QF46EEJ0KU5
43	Teenway	A375NEJ8P0ELM
44	The Neighbor's Store	A1UGGHD4U8VXIP
45	ToBe-Unique	A3FQ48J53DINFC
46	wanen	A3CBY6BREN9258
47	WGGH	A32OUA9LYBM2WH
48	WNWZZ	A2SGY75D4DNOEY
49	WuHanChaoYouKuaJingDianZiShangWuYouXianGongSi	A35MK5ML95FWSG
50	Z-Grobal	AJMX49V6J8AWX
51	Ali ceiling Store	1100034150
52	Aliexpress Good Kitchen Assistant Store	911116188
53	Animalhouse Store	912638012
54	Aniya life Store	2963253
55	Boutique life Store	5710093
56	COZY Style Store	1100026068
57	cuddly Store	912615520
58	Dai Department Store	900242204
59	Detian Store	911052029
60	Doggiefun Store	911324133
61	Dogi Pet supplies Store	2662136
62	DZOMNOK Store	912603111
63	Eruzaray Living Store	910883017
64	EverChic Such-Life Store	5873388
65	FCXDG PetsLife Store	5785603
66	firry living store	912613339
67	FUTUSHIJIE Store	912468600
68	Happiness supermarket Store	911754695
69	HJKL PetsLife Store	5890601
70	HowardHOME Store	3054066
71	HYXFly House Store	5786980
72	iPGY Store	9172724155

73	IT AND ME Pet Store	5589428
74	JMshop Store	912491405
75	JSQQ Store	912461372
76	matsofamic Pet Official Store	5888942
77	MHORLX Store	5477101
78	MS HLHW01 Store	910940035
79	MS HLHW02 Store	910946009
80	MS HLHW03 Store	910940025
81	New Life Products Store	5722163
82	PetitPet Store	912639184
83	PICK PET Official Store	812394176
84	Shop110006051	1100006051
85	Shop1100178032 Store	1100178032
86	Shop4233035 Store	4233035
87	Shop5431295 Store	5431295
88	STAO Store	912617903
89	taotaoPet Store	910716066
90	Tastybone Store	911747333
91	two L Store	912625688
92	Yang168 Store	911664179
93	YCloud Pet Store	3791001
94	Yiwu lingchong pets Store	910355076
95	YOKEE PET Store	1100227574
96	4ontherrun	255379382067, 254384699417
97	alittlethings-xumu	174405730507
98	angela_hff78	164702632772
99	anmel-9921	194870582727
100	appretzmedia	143809700912
101	arelyangellaurent	174458567090
102	averhaye-0	284375863329
103	aykewa0	234484558749
104	beauty.box	234404494614, 234404424780
105	bellas_pawtique	402642633401
106	bestonlineshops	224867154647
107	betocorona37	124998500714
108	camgamesales	185260277144
109	cha_g2gyvk	333808505409

110	chun_8594	313757412136
111	citru_5625	334313764893, 334323369194
112	dantress	264833862715
113	dayon_60	313760153022
114	dayton_ohio	124467557643, 124762784355
115	dedagirl	175220415872
116	djpetstore	174325058265
117	dmg30	165282013776, 165282043279, 165282015725
118	dtmgoods	353357589402
119	dulanjana87	353737615156
120	edinessboss	255448183034
121	emily154	254477209873
122	enrikastore	353099667296
123	epicesolutions	284663761289
124	euphoriahm	133679747356
125	fagu7386	154706263292
126	focus-parts	284328765295
127	foreveryoung377	265527688376
128	gitterm123	274970577144, 274976556693, 274974263815, 274973718199, 284284261270
129	gndealz	174540145632, 174356319741
130	goodedealsnogales	313922230715, 313876093404
131	happlyoneday	313257206314
132	happydeal-mall	284226137598
133	honggang2019-1	124662746277
134	how-1514	353966067735
135	idydz_accessories	133426095115
136	iiix_tream	224214400263
137	iluzion69	133533018683

138	iront7624	185174559039
139	jacbo_9711	143674610051, 143625784070, 144448237204
140	jb2010-2012	115260014480
141	jennlynne2	265613708833, 265613708777
142	joshboysgaming	203871510258
143	jrte-2662	363252608698, 363626835708
144	jsgm17	244093567467
145	jtaylor3344	284612142202, 284612020271
146	katjuus	233867945874
147	kclu_30	403368061967
148	keithbates2012	184530085450
149	kidon2014	185320227340
150	leading-wireless	133886313394
151	lem_5142	384775927641
152	liuming79	234248146335
153	mart-2216	384510856477
154	mebr007	114465509009
155	miami98	114374225190
156	minaudas	174888472904
157	mucerio7788	363395400635
158	mustang692010	174878430466
159	nalindsilv_0	144129545370
160	nics_naxx	313883381910
161	nighacollection	114934256082, 125230221696
162	northerncomm_33	392799120144
163	notw92345	154429310988
164	palplaza	313804045988
165	peaceful62	233696118052
166	phkasi0	363777326557
167	primetime_distribution	363502614033
168	primetimedistribution94	185216321595
169	princessx4	124633382825
170	progunzxz	174527268723

171	purs_81	203246977431, 203270424277
172	qiren32	234293588204
173	rayshop90	165296166443
174	rohan_e_mart	164469390838
175	rschlapp	333584313317
176	sandys_place_10	384443583760
177	savaglo-15	224847984923
178	scraggy99	175115547966
179	shellbeal	324701739014, 324697075176
180	shop-mida	265379767639
181	slickzthings4u	265145061621
182	smartbuystore_01	294549740661
183	smartgoals	352804457606
184	soletgo	124545866212, 124805155459, 124805227058
185	stevenatin-0	403481321213
186	suaznavarshop2	325024327040
187	ta-558789	384509268535
188	texmedusa	363628183408
189	twelve*29	402888681195
190	unepart	115099491104
191	universeabc	234240804700
192	vickie7772	193853725636
193	wa321849	4033636879302
194	wanted2017	164864504563
195	xinhao34	393710186174
196	zh5682	384507251218
197	fablab	5d58df0540defd5641acb0fd
198	gxbdyxgs	5d5d10b82736783ea8e269b1
199	shenzhendayanghuixinkejiyougongsi	57c7a2930ec9b42c8afbdab5
200	woniuniu	5f40003acacdc1474faea18f
201	xiazimeizhuang	5b39b18e48fca93fef98276e
202	ywgsyouth0410	59f86355dc7a9145d9dff550

**Schedule “B”
Patent Infringing Products**

Type 1 Infringing Product



Type 2 Infringing Product



Type 3 Infringing Product



Type 4 Infringing Product



Type 5 Infringing Product



Type 6 Infringing Product

