

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

HAPPY HOUR THINKING, LLC,

Plaintiff,

v.

ZEUS, *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 DISCOVERY


This matter is before the Court upon Plaintiff's *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. The legal support for this motion is contained in the accompanying Memorandum of Law.

By the instant Application, Plaintiff moves *ex parte* pursuant to 15 U.S.C. § 116, 17 U.S.C. § 502, 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 Lanham Act, 15 U.S.C. §§ 1114 and 1125(a), the Copyright

Act, 17 U.S.C. § 501, and related state law claims.¹ Because Plaintiff has satisfied the requirements for the issuance of a temporary restraining order, and good cause has been shown for the issuance of the same, the Court grants Plaintiff's Application.

FACTUAL FINDINGS & CONCLUSION OF LAW


1. Plaintiff is likely to prevail on its Lanham Act claims, copyright claims, patent claims, and related state law claims at trial.

2. Plaintiff's co-founder, Ryan Kohli, is the co-inventor of the THE CORD WRAPPER™ cord organizer and Plaintiff is the owner of intellectual property related thereto; Happy Hour Thinking, LLC is the exclusive licensee of such intellectual property. Plaintiff developed and sells its innovative product under the common law trademark THE CORD WRAPPER™ and design:  ("Plaintiff's Mark") that facilitates the organizes and store electrical cords of kitchen appliances and electronic devices ("Plaintiff's Product"). The Plaintiff's Product is protected by a patent and is marketed through its unique packaging and photographs, some of which are the subjection of federally registered copyright. Additionally, expressive artwork and presentation and configuration of the Plaintiff's Product comprise its well-known and now distinct trade dress.

3. Plaintiff has gained significant common law trademark and other rights in Plaintiff's Product, through use, advertising, and promotion.

4. Plaintiff is the owner of US Design Patent No. D913,776 S ("Plaintiff's Patent").

¹ While Plaintiff alleges that all the Defendants have infringed on the Plaintiff's Patent, and unfairly competed, the evidence shows that Defendants Shenzhen City Anston Technology Co., Ltd., Yiwu Changde Trading Co., Ltd., Global Bridge Industry Co., Ltd., E-outstanding, Xunshi Electronic, Yuqin Shop, hgtr62, goodsbetter, Shenzhen Mingxin Yang Trading Co. did not use Plaintiff's photographs, thus they are not alleged to have infringed on Plaintiff's registered copyright.

5. Plaintiff is the owner of THE CORD WRAPPER™ and design:  (“Plaintiff’s Mark”) and/or that use packaging that bears and/or is used in connection with marks and/or trade dress (hereinafter referred to as the “Plaintiff’s Trade Dress”).

6. Plaintiff is the owner of U.S. copyright registration VA-0002-34-9904 for Photos of Plaintiff’s Product as used (“Plaintiff’s Works”).

7. 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 goods featuring, displaying, and/or using Plaintiff’s Patent, Plaintiff’s Works, Plaintiff’s Trade Dress, and/or Plaintiff’s Mark, without authorization. Plaintiff has determined the products that each Defendant is offering for sale are not genuine products made and sold by Plaintiff.

8. Through the e-commerce marketplace platform, Plaintiff 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 Plaintiff’s representative who confirmed that each Defendant is featuring, displaying, and/or using Plaintiff’s Patent, Plaintiff’s Works, Plaintiff’s Trade Dress, and/or Plaintiff’s Mark without authorization and the products that each Defendant is offering for sale are not genuine.

9. Plaintiff has a strong probability of proving at trial that consumers are likely to be confused by Defendants’ advertisement, promotion, sale, offer for sale, or distribution of products with unauthorized and unlicensed uses of Plaintiff’s Patent, Plaintiff’s Works, Plaintiff’s Trade Dress, and/or Plaintiff’s Mark in violation of Section 32 of the Lanham Act, 15 U.S.C. § 1114, and Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), that Plaintiff’s

copyrights have been infringed in violation of 15 U.S.C. § 501, and prevailing on its related state law claims.

10. Plaintiff as well as consumers are likely to suffer immediate and irreparable losses, damages and injuries before Defendants can be heard in opposition, unless Plaintiff's Application for *ex parte* relief is granted. There is good cause to believe that the unauthorized and unlicensed use of Plaintiff's Patent, Plaintiff's Works, Plaintiff's Trade Dress, and/or Plaintiff's Mark will continue in the marketplace; that consumers are likely to be misled, confused, and disappointed by the quality of the products so advertised, and that Plaintiff 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 Plaintiff proceeds 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 Plaintiff's 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 Plaintiff, its reputation, and its 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 Plaintiff's interests and protect the public from being deceived and defrauded by the passing off of Defendants substandard goods as Plaintiff's genuine goods.

13. Under Pennsylvania law this Court may issue a prejudgment asset restraint where Plaintiff's complaint asserts a claim for money damages.² This Court also has the inherent authority to issue a prejudgment asset restraint when Plaintiff's complaint seeks relief in equity. According to both the Lanham Act and Copyright Act, 15 U.S.C. § 1117(a)(1) and 17 U.S.C. 504(b), Plaintiff is entitled, "subject to the principles of equity, to recover ... defendant's profits." Plaintiff seek, among other relief, that Defendants account for and pay to Plaintiff all profits realized by Defendants by reason of Defendants' unlawful acts. Therefore, this Court has the authority to grant Plaintiff's request for a prejudgment asset freeze to preserve the relief sought by Plaintiff 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 Plaintiff the records and documents relating to Defendants' illegal and infringing activities. Therefore, Plaintiff has good cause to be granted expedited discovery.

² 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 assets in class action lawsuit). Pre-judgment restraints are appropriate against these sellers under *Walter* and *Hoxworth*. See also, *Aquapaw Brands, LLC v. Joyi Yan*, et al., 22-cv-1607-CCW (W.D. Pa., filed November 17, 2022)(Wiegand, J); *Nifty Home Products, Inc. v. Ladyanna US, et al.*, 22-cv-994-AJS (W.D. Pa., filed July 13, 2022)(Schwab, J); *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).

ORDER

Based on the foregoing findings of fact and conclusions of law, Plaintiff's 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 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 Plaintiff's Patent, Plaintiff's Works, Plaintiff's Trade Dress, and/or Plaintiff's Mark in connection with the 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 which infringe on Plaintiff's Patent, Plaintiff's Works, Plaintiff's Trade Dress, and/or Plaintiff's Mark;
- (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,³ Merchant Storefronts⁴ or

³ 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, ebay.com, Alibaba.com, Aliexpress.com, Walmart.com, and wish.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.

⁴ 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.

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) 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 discontinue use of the Plaintiff’s Mark and/or Plaintiff’s Works 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 (Alibaba.com) 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”), Joybuy Marketplace operated by Jingdong E-Commerce (Trade) Hong Kong Co. , Ltd and JD E-Commerce America (collectively, “Joybuy”), Whaleco Inc., a Delaware Corporation, which is a wholly owned subsidiary of Pinduoduo Inc. which is owned by PDD Holdings (collectively, “Temu”), Walmart.com USA LLC and Walmart, Inc. (“Walmart”), 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”)⁵, Amazon Payments, Inc. d/b/a pay.amazon.com, and PayPal, Inc. d/b/a paypal.com (“PayPal”), Walmart d/b/a Walmart Pay (“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;⁶

⁵ WorldPay US, Inc. (“WorldPay”) processes transactions on behalf of Alibaba and Alipay, which may appear as “Aliexpress” on a cardholder’s credit card statement.

⁶ 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

- (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 Plaintiff’s counsel with all data that details (i) an accounting of the total funds restrained and identifies the financial 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;

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.

(10) Upon Plaintiff's request, any Internet marketplace that 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 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 offering, advertising, shipping and/or selling the Infringing Products at issue in this action and/or unfairly competing with Plaintiff;

(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 Plaintiff's request, any Internet marketplace that 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 Plaintiff's 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 five (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 Plaintiff's request, within no later than five (5) calendar days of Plaintiff's request:

- (1) Amazon is ordered to remove any seller identified by Plaintiff from the following Amazon Standard Identification Numbers (ASINs): B098SS88PM (2 pack Black), B0BKHBK9P8 (2 pack Grey), B0BKN2LSWQ (2 pack Red), B098STNL5K (2 pack White), and B0B33KSQRV (4 pack Black/White).⁷;

⁷ These are the current ASINs assigned to the Plaintiff's Products by Amazon. (Declaration of Ryan Kohli, ¶ 11).

(2) 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); and

(3) Upon Plaintiff’s request, any Third Parties are ordered to suspend any listing of a product that Plaintiff assert infringes at least one claim of the Plaintiff’s Patent, and/or infringes Plaintiff’s Works and/or Mark and/or Trade Dress, and is identified as originating outside of the United States and unfairly competing with Plaintiff’s Product.

**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 ___ day of _____, 2023, 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 Plaintiff’s counsel by delivering copies thereof to the office of Ference & Associates LLC at 409 Broad Street, Pittsburgh, Pennsylvania 15143 before _____, 2023. Plaintiff shall file any Reply papers on or before _____, 2023.

C. After Plaintiff’s counsel has received confirmation from the Third Party Service Providers and Financial Institutions or otherwise, regarding the restraint of funds directed herein,

Plaintiff 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. In addition, Plaintiff 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 Plaintiff,⁸ and shall provide the website address to Defendants via e-mail/online contact form, and such notice so given shall be deemed good and sufficient service thereof. Plaintiff 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 Plaintiff 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) Plaintiff 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 Plaintiff's counsel.

⁸ 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 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).

(2) Plaintiff 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 Plaintiff's counsel.

(3) Plaintiff 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 Plaintiff's counsel.

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 Plaintiff's 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 Plaintiff's Patent, Plaintiff's Works, Plaintiff's Trade Dress, and/or Plaintiff's Mark in connection with the distribution, marketing, advertising, offering for sale, or sale of any Infringing Products.

V. Security Bond

IT IS FURTHER ORDERED that Plaintiff 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 "ZEUS and all other Defendants identified in the Complaint" that will apply to all Defendants.

SO ORDERED.

SIGNED this ____ day of _____, 2023, at _____.m.
Pittsburgh, Pennsylvania

UNITED STATES DISTRICT JUDGE

Schedule “A”
Defendants With Store Name and Seller ID

Defendant No.	Store/Seller Name	Seller ID
1	ZEUS	101043387
2	jiaroswwei	101172809
3	Koszal	101043404
4	PureSell	101243492
5	SHAPERME, inc	101224389
6	Shenzhen City Anston Technology Co., Ltd.	1600699778204, 1600699748350
7	Yiwu Changde Trading Co., Ltd.	1600796881958
8	Helloworld (Guangzhou) Import & Export Co., Ltd.	1600638967647, 1600462373053
9	Global Bridge Industry Co., Ltd.	1600483478911
10	Aangbs-Tools Store	1101808276
11	Beautiful Life house improvement Store	1101246993
12	Beautify Life 9 Store	1101746024
13	BJYXSZD romantic Store	1101895241
14	CC Home-Decor Store	1101863368
15	Coolco Store	1102644187
16	Digital & Convenient Store	1101560920
17	Funny Life Heal Store	1101547448
18	ILOVEIHOME Store	1101538960
19	Organization Dropship Store	1101542841
20	Reiki Store	1102591659
21	Romantic flowers Store	1101320660
22	Shop1102107715 Store	1102110662
23	Shop1102460340 Store	1102454431
24	Shop1102513137 Store	1102512177
25	Shop1102647567 Store	1102649522
26	Sonoff ShenZhen Store	1101235719
27	Warm warm warm Store	1101561070
28	BENOSPACE	ACVV0PGIDHTVX
29	Blurte431	AZYZB6OQFMIQ6
30	Chenndus	A19JB4U5KYS1EN

31	Clina-us	A2HVLYL8578Y5L
32	E-outstanding	AB0Z3CZXYVM06
33	Fupiupero-US	ABUVLNI2DG38I
34	Fuzhangchang	A251C70GHQUG9Z
35	GYbeimeidian	A2ZB3PLHREGYDA
36	Joneser0916	A3U8PGYF2MU62J
37	Mandy Meet	ANNYAPDVQXTAA
38	Mecxicy	A3BMND6J0WS9C4
39	Meiyyass	A320PRF5DL0GHE
40	Mirandalong-US	A2C0F8U7Q5SX2F
41	Nancong	A1H5K3TL9GBZ12
42	Naroote	AA3U1N3HAOFYS
43	Nitrip	AXKP3JTT4K7DQ
44	salmue	A46SVXD99K5JN
45	sunboruino	A20EV1HFK23EFH
46	Suntaskw	A3JN271H0LF8DG
47	Terlog	A24KK1JV764V60
48	Venderer Group	A1VTKZA1O34QGS
49	Vinnat us	A800K93L4PQ6B
50	Wadiue-US	A2DEKN8DORT2H4
51	xianghuiflagshipstore	AVC3H0Y3II3BE
52	Xunshi Electronic	A1ARXTYDR5UDPA
53	Xzhan-US	A1NTAMSY46SH7L
54	Yuqin Shop	AE53XGQBRY40A
55	Zeoo	A364RDEYR1KAU3
56	Zhengruus	A2A5MQYNQ5G8YU
57	tianzhu.mountain	354771950476
58	shaoyo-5	404314455772, 404314576941
59	dilux73	225563035500
60	wixo17-48	314502139122
61	ruolrl	155580863688
62	hgtr62	394535897793
63	meihao 2021	404335530565
64	zhangyixin86	394663399070
65	feijsaufl03	354713420670
66	goodsbetter	354859331738
67	Chengdu Jia Li Technology Co.	789535868
68	Chengdu Orange Blossom Cheng Technology Co.	539389858

69	Shenzhen Mingxin Yang Trading Co.	250439047
70	Chengdu Orange Blossom Cheng Technology Co.	451457839
71	Shenzhen Qianxing Yi Technology Co.	609162477
72	Shenzhen Qianxing Yi Technology Co.	362053570
73	Shenzhen Ming Xin Yang Trading Co.	250439047
74	Shenzhen Hao Yi Xin Technology Co.	726036389
75	Shenzhen Goodyear Technology Co.	335215174
76	Tuker	2763855412077
77	romadaiana70	5e6e574d4f421096d067c353
78	WANGYO	5e991d17ec962135c8ecb2aa