

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

AQUAPAW BRANDS LLC,  
Plaintiff,

v.

TROPICALPARADISE, *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.

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 AllWrits 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. 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, AquaPaw Brands LLC, is likely to prevail on its Copyright and Lanham Act claims at trial.

2. Plaintiff's patented product solved the challenging problem of bathing a dog by examining the task from the dog's perspective.<sup>1</sup> By creating a sprayer/scrubber operable by one hand, the inventor was able to hold and comfort the dog with the free hand while cleaning the pet with the device. Today, the product is sold by Plaintiff under the brand name Aquapaw<sup>®</sup> Pet Bathing Tool ("Plaintiff's Product").

3. Plaintiff's Product is marketed and advertised extensively including on its website aquapaw.com and its storefront on Amazon.com. The unique features of Plaintiff's Product and the manner in which it is marketed and advertised, including, the distinct photographs, the design, the instructions, the packaging, and the unique presentation of the product, all comprise Plaintiff's valuable intellectual property ("IP") and all have become distinct in consumer's minds such that consumers associate all of this IP with Plaintiff's Product. Screenshots from Plaintiff's Website and Amazon Store are attached as **Complaint Exhibit 1**

4. 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"), are promoting, advertising, distributing, selling, and/or offering for sale of goods bearing and/or using marks that are virtually identical, both visually and phonetically, to Plaintiff's Copyrighted Works, and/or substantially similar copies thereof

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<sup>1</sup> The innovative features of Plaintiff's Product are the subject of U. S. Patent No. 10,531,728 entitled "Hand Attachable Animal Washing Apparatus".

and Plaintiff has determined the products that each Defendant is offering for sale are not genuine products.

5. 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 has used without authorization at least one photo or screenshot from at least one of Plaintiff's copyrighted videos or photographs covered by U.S. Copyright Reg. No. VA-0002098373, U.S. Copyright Reg. No. VA-0002098372, U.S. Copyright Reg. No. VA-0002096921, and U.S. Copyright Reg. No. PA-0002068689 ("Plaintiff's Copyrighted Works") ("Infringing Products").

6. Plaintiff, as well as consumers and animal owners, is 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 offering for sale and sale of Infringing Products 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 its 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.

7. 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.

8. 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.

9. Under Pennsylvania law this Court may issue a prejudgment asset restraint where Plaintiff's complaint asserts a claim for money damages.<sup>2</sup> 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.

10. 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.

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<sup>2</sup> 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 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. CDOffice 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 Copyrighted Works, 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 Plaintiff's Copyrighted Works;
- (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,<sup>3</sup> Merchant Storefronts<sup>4</sup> or

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<sup>3</sup> As defined in the Complaint, a "User Account" is any and all accounts with online marketplace platform, including, Aliexpress.com, Amazon.com, eBay.com, Joybuy, Temu, Wish.com, and Walmart.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.

<sup>4</sup> 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 cease 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 Copyrighted 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 Amazon Services, LLC d/b/a Amazon.com, and Amazon Payments, Inc. d/b/a Amazon Pay (collectively “Amazon”), 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”), eBay, Inc. d/b/a ebay.com, Walmart Inc. and Wal-Mart.com USA, LLC, wish.com, Alibaba.com US LLC d/b/a Alibaba.com and Aliexpress.com (“Third Party Service Provider(s)”), and financial institutions, including but not limited to, 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”)<sup>5</sup>, Amazon Payments, Inc., Walmart Pay, PayPal, Inc. d/b/a paypal.com, and Context Logic, Inc. d/b/a wish.com (“Financial Institutions,”)<sup>6</sup> 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

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

<sup>6</sup> Plaintiff acknowledges it is seeking multiple forms of relief. Plaintiff will promptly provide supplemental briefing or oral argument on any issue should the Court request it.

this Order; and (iii) any other accounts tied to or used by any of the Seller IDs identified on Schedule “A” hereto;<sup>7</sup>

- (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

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<sup>7</sup> 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.

or Financial Institution's security interest in the funds) without express authorization of this Court;

(10) Upon Plaintiff's 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 selling the Infringing Products;

(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 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 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 HEREBY 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.com, Inc., and its related companies and affiliates, including Amazon Services, LLC, and Amazon Payments, Inc. (collectively "Amazon"), are hereby restrained and enjoined, pending the hearing and determination of Plaintiff's Application for a preliminary injunction, or until further order of the Court, from processing payments for any products listed under the following Amazon Standard Identification Numbers (ASIN):  
B06Y3QSGWP by any Seller that has not been authorized by Plaintiff; Plaintiff shall provide notice to Amazon of Plaintiff's authorized sellers;

(2) Amazon.com, Inc., and its related companies and affiliates, including Amazon Services, LLC, and Amazon Payments, Inc., shall place the following Amazon Standard Identification Number B06Y3QSGWP, into Amazon's gating program, so that Plaintiff will be able to control which sellers list product under these ASINs; and

(3) upon Plaintiff's request, Amazon.com, Inc., and its related companies and affiliates, including Amazon Services, LLC, and Amazon Payments, Inc., shall remove listings and/or advertisements for any product that Plaintiff identifies as using Plaintiff's Copyrighted Works (i.e., preventing a seller from listing for sale under the identified ASIN);

(4) The Plaintiff has 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 are Infringing Products; consequently, all online marketplaces, including but not limited to, Alibaba, amazon.com, ebay.com, aliexpress.com, Joybuty, Temu, Walmart.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.

(5) Upon Plaintiff's request, a Third-Party Service Provider shall remove listings and/or advertisements for any product advertised using Plaintiff's Photographs and/or Videos.

(6) this Order shall remain in effect during the pendency of this action or until further order of the Court.

## 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, the U.S. Courthouse, 700 Grant Street, Pittsburgh, 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 \_\_\_\_\_, 20\_\_\_. Plaintiff shall file any Reply papers on or before \_\_\_\_\_, 20\_\_.

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,<sup>8</sup> and shall

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<sup>8</sup> 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*

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.
- (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,

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*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).

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 Copyrighted Works.

**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 "TROPICALPARADISE and all other Defendants identified in the Complaint" that will apply to all Defendants.

**SO ORDERED.**

SIGNED this \_\_\_\_ day of September, 2023, at \_\_\_\_ .m.  
Pittsburgh, Pennsylvania

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UNITED STATES DISTRICT JUDGE

## Schedule "A"


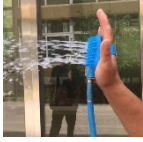






### Defendants With Store Name and Seller ID

<b>Defendant Number</b>	<b>Defendant/Store Name</b>	<b>Seller ID</b>
1	TropicalParadise	57ee2e936a20961027ed12dd
2	Doggy Steven Store	5dd14fdf703f613b40199956
3	Gift House	5837843215914549efa74462
4	HANXU NN	63ef35ea57f6c85801d8b8b8
5	nangua	5789b8a99035dc555db25d43
6	xuxiaojun1759	60b0736e36badc94eaffc880
7	yyiyaya	5783466488eb7a0ff31c511a
8	A Family Of Pet Lovers Store	1102765582
9	AODOO shipping Store	1101548934
10	Aquakiwi Store	1101893106
11	Art Bath Store	1101561007
12	AYIJIA-01 Store	1101411973
13	Cute Paws Pets Store	1102137215
14	Cute Store	1102728273
15	DGFC HPA Store	1101494615
16	DleHome Store	1101879889
17	Dudon PETS Store	1101309206
18	EHEH Store	1101251677
19	Fashion Clothes For Dogs Store	1102772193
20	FisPet Store	1101986732
21	Gloabl Pets Supplier Store	1101774718
22	Hinko Gany Store	1101397265
23	homegarden1 Store	1101328102
24	HOTcolor Store	1101825446
25	Impression Home Store	1102588103
26	Ipawspace Pet Store	1102498241
27	JANEYI Store	1102156587
28	KeePiy Store	1101868284
29	KOVA TOY Store	1101535082
30	LM Love Pet Store	1101672153
31	LYPets Store	1101384895
32	Magjew Store	1102085314
33	MARUI Store	1101938695
34	ONE PET SUPPLY Store	1101802232
35	OnePet Store	1101954910
36	online hot deals Store	1102005455
37	PETART Store	1102815517








38	Pets Tribe Store	1101303711
39	Petsupplies Dropshipping Store	1101381892
40	PowerPaw Store	1101391964
41	rabichen Store	1101821375
42	Shop1100227377 Store	1102021462
43	Shop1855178 Store	1101103503
44	Shop911458011 Store	1101623327
45	Spicy strips Store	1101610283
46	SSHEN PET Store	1102775209
47	sunnoo Store	1101693689
48	TAIBAIJIA Official Store	1100447201
49	TIPEGON Official Store	1101288772
50	Urwellcome Store	1101930100
51	WBWBMV Store	1101516853
52	With Pets Store	1101553176
53	World Pet Supplies Store	1102499012
54	Xleipet Store	1101425963
55	XRuiPet	1101136545
56	XWangPet Store	1101315865
57	Yaluosi Store	1101894886
58	Yongliang LED Lighting Store	1101698793
59	YOZWOO Home Store	1102203325
60	YPLG Store	1101319659
61	ZhuLi866 Store	1101910530
62	RFCW Pet Supplies Store	1102776541
63	aofenggasiefeng	A2SCBNZHH38FSF
64	Guanlai01	A3879TLL9WFEZF
65	Homegarchen	A2XM1301Y2GYM
66	linshengshangdian	AZ4AF9NXEDD9I
67	ReCheng	A1PBMPVG01QG5E
68	RUN666	A1LSNKBB09HWXP
69	Teagany	AW9YB5V49RGHI
70	WANGSUAN	A34KSQ1M9FITHR
71	xilei888	A3J3ZH8KN8J19Z
72	Shenzhen Kaiyuan da electronic Commerce Co., LTD	10963
73	Shenzhen Mingxinyang trading Co., LTD	9330
74	Chengdu orange flower Cheng technology Co., LTD	11419
75	Excellent Products Shop	6072727823483
76	Many cats	4828499765869
77	Shenzhen Bolandi Toys Co Ltd	6126377163188
78	Sports Hall	70968774437
79	TGB	2524121526999
80	Thousands of birds to Lin	145676434025

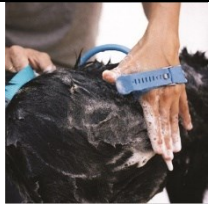


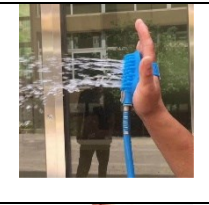

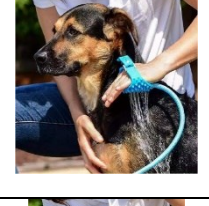

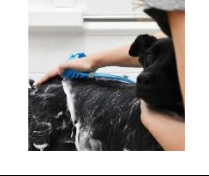
81	Tirth	321798588190
82	Worry free shop	40793316327
83	G-CHEN	101276139
84	LiFeng Electronic Co. ltD	101245782
85	Niuta Technology Co., Ltd	101295021
86	SHANG HAI BAO YU ELECTRONIC BUSINESS CO LTD	101044628
87	Ugerlov Fashion Co. Ltd	101180744
88	Xinlie	101095294

**Schedule “B”**  
**Defendant/Store Names and Infringing Products**

Defendant No.	Defendant/Store Name	Screen shot
1	TropicalParadise	
2	Doggy Steven Store	
3	Gift House	
4	HANXU_NN	
5	nangua	
6	xuxiaojun1759	
7	yiyaya	
8	A Family Of Pet Lovers Store	


9	AODOO shipping Store	
10	Aquakiwi Store	
11	Art Bath Store	
12	AYIJIA-01 Store	 <p data-bbox="1138 1024 1268 1087"> <b>PRODUCT DESCRIPTION</b>          Pet brush, Pet hair brush          Washable          Pet hair brush spray, for pet bathing, pet care          Professional Pet brush, Pet          Hair brush, Pet          Pet hair brush       </p> 
13	Cute Paws Pets Store	
14	Cute Store	

15	DGFC HPA Store	
16	DleHome Store	
17	Dudon PETS Store	
18	EHEH Store	
19	Fashion Clothes For Dogs Store	
20	FisPet Store	
21	Gloabl Pets Supplier Store	




22	Hinko Gany Store	
23	homegarden1 Store	
24	HOTcolor Store	<p data-bbox="1161 646 1258 661">SIMPLE OPERATION</p> 
25	Impression Home Store	
26	Ipawspace Pet Store	
27	JANEYI Store	
28	Keepiy Store	 









29	KOVA TOY Store	
30	LM Love Pet Store	
31	LYPets Store	<p><b>JUST 5 EASY STEPS!</b></p> 
32	Magjew Store	
33	MARUI Store	
34	ONE PET SUPPLY Store	
35	OnePet Store	
36	online hot deals Store	<p><b>ELIMINATES MESS AND STRESS</b></p> 
37	PETART Store	










38	Pets Tribe Store	
39	Petsupplies Dropshipping Store	
40	PowerPaw Store	<p>HOW TO USE</p> 
41	rabichen Store	
42	Shop1100227377 Store	
43	Shop1855178 Store	
44	Shop911458011 Store	


45	Spicy strips Store	
46	SSHEN PET Store	
47	sunnoo Store	
48	TAIBAIJIA Official Store	
49	TIPEGON Official Store	
50	Urwellcome Store	
51	WBWBM Store	
52	With Pets Store	

53	World Pet Supplies Store	
54	Xleipet Store	
55	XRuiPet	
56	XWangPet Store	
57	Yaluosi Store	
58	Yongliang LED Lighting Store	
59	YOZWOO Home Store	

60	YPLG Store	
61	ZhuLi866 Store	
62	RFCW Pet Supplies Store	
63	aofenggasiefeng	
64	Guanlai01	
65	Homegarchen	
66	linshengshangdian	
67	ReCheng	

68	RUN666	
69	Teagany	
70	WANGSUAN	
71	xilei888	
72	Shenzhen Kaiyuan da electronic Commerce Co., LTD	
73	Shenzhen Mingxinyang trading Co., LTD	
74	Chengdu orange flower Cheng technology Co., LTD	
75	Excellent Products Shop	
76	Many cats	

77	Shenzhen Bolandi Toys Co Ltd	
78	Sports Hall	
80	TGB	
81	Thousands of birds to Lin	
82	Tirith	
83	Worry free shop	
84	G-CHEN	
85	LiFeng Electronic Co. ItD	
86	Niuta Technology Co., Ltd	

87	SHANG HAI BAO YU ELECTRONIC BUSINESS CO LTD	
88	Ugerlov Fashion Co. Ltd	