

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

JJ DESIGN HOUSE, LLC,

Plaintiff,

v.

YIQIYOU, *et al.*,

Defendants.

Civil Action No.

**FILED UNDER SEAL**

**[PROPOSED] PRELIMINARY INJUNCTION ORDER**

WHEREAS, Plaintiff filed an *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.

WHEREAS, Plaintiff filed an *Ex Parte* Motion for An Order Authorizing Alternative Service on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3);

WHEREAS, On February 25, 2025, the Court entered the following Orders:

(A) (1) a temporary restraining order; (2) an order restraining assets and Merchant Storefronts, (3) an order to show cause why a preliminary injunction should not issue; and (4) an order authorizing expedited discovery against all of the Defendants identified on the attached Schedule “A”, and the Third-Party Service Providers and Financial Institutions, in light of

Defendants' intentional and willful offerings for sale and/or sales of Infringing Products ("Application"); and

(B) Order Authorizing Alternative Service on Defendants Pursuant to Federal Rule of Civil Procedure 4(f)(3) ("the Alternative Service Order");

WHEREAS, pursuant to the terms of the Alternative Service Order, all the Defendants have been served with notice of this Show Cause Hearing; and

WHEREAS, on March 31, 2025, Plaintiff, appeared for the Order to Show Cause Hearing, however no Defendants appeared. Further, none of the Third-Party Service Provider(s) or Financial Institution(s) appeared.

Specifically, Plaintiff has presented evidence clearly demonstrating that Defendants are using without authorization Plaintiff's copyrighted works,<sup>1</sup> while promoting, selling, offering for sale and distributing knock-offs of Plaintiff's Products in a willful attempt to pass off their knock-off products as genuine versions of Plaintiff's Products within this district and throughout the United States by operating e-commerce stores established via at least one of the Internet marketplace websites Amazon.com and Walmart.com under their Store Names and Seller Names identified on **Schedule "A"** of the Complaint (the "Seller IDs" ("Infringing or Knock-Off Products")).

The Court having considered all of the arguments and evidence set forth in the respective parties' filings, and as discussed in Court, having found good and sufficient cause to grant the

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<sup>1</sup> Plaintiff has obtained the following copyright registrations on its original works used to market and advertise its products: VA 2-411-886; VA 2-411-570; VA 2-411-568; VA 2-411-567, VA 2-411-571, VA 2-411-887, and VA 2-411-890. True and correct copies of the registrations are attached to the Complaint and marked as **Exhibit 1** (the "Jessie Gगतko Works").

injunctive relief as set forth below, and, for the reasons set forth on the record, it is hereby ORDERED:

### **I. Restraining Order**

A. IT IS HEREBY ORDERED, as good and sufficient cause has been shown, the injunctive relief previously granted on February 25, 2025, shall remain in place through the pendency of this litigation, and issuing this Preliminary Injunction (hereafter “PI Order”) is warranted under 17 U.S. Code § 504, and Federal Rule of Civil Procedure 65.

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 Jessie Gagatko Works in connection with the distribution, marketing, advertising, offering for sale, or sale of any products; and (b) shipping, delivering, holding for sale, transferring, or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner products which use the Jessie Gagatko 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>2</sup> Merchant Storefronts<sup>3</sup> or

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<sup>2</sup> As defined in the Application, a “User Account” is any and all accounts with online marketplace platform(s) Amazon.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>3</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 discontinue use of the Jessie Gatko 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 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”), 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 Alipay US Inc. d/b/a Alipay.com (“Alipay”), 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;<sup>4</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

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<sup>4</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 discovered 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.

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; (in order to confirm compliance with this Order, the Plaintiff is permitted leave to serve a subpoena on such Third Party Service Provider(s) and Financial Institution(s) seeking the following information: (a) Bank account and routing numbers registered and used with regard to each seller account; (b) Financial records and other documents identifying the use of third-party payment service providers such as Payoneer and Wise; (c) Dates when funds were last sent from the seller to their seller account and the respective amount transferred; (d) Dates when funds were last sent from the seller

account to the seller and the respective amount transferred; (e) amount and location of the seller's assets that are in Amazon's control; and (f) all documents identifying the Defendants.

(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 infringing the Jessie Gagatko Works;

(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 PI Order and the Alternative Service Order, shall remain in effect during the pendency of this action or until further order of the Court, and Plaintiff shall serve the Defendants with a copy of this PI Order in accordance with the Alternative Service Order.

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 HEREBY ORDERED, upon Plaintiff's request, within no later than five (5) calendar days of Plaintiff's request: all online marketplaces, including but not limited to, Amazon.com, eBay.com, AliExpress.com, Temu, Walmart.com, and Wish.com, shall upon receipt of this Order, suspend, block, tombstone, and/or delete any and all product

listings identified by the Plaintiff as either identical or substantially similar to the Jessie Gagatko Works, whether sold by the Defendant or other persons or entities.

D. IT IS HEREBY ORDERED, that upon Plaintiff's request, any Third Parties are ordered to suspend any listings of a product that Plaintiff asserts infringes the Jessie Gagatko Works, and is identified as originating from outside of the United States and unfairly competing with Plaintiff's Products.

## **II. 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,

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<sup>5</sup>; and

- (4) Defendants' unauthorized and unlicensed use of the Jessie Gagatko Works in connection with the distribution, marketing, advertising, offering for sale, or sale of any products, and all products, which use the Jessie Gagatko Works.

### **III. Security Bond**

IT IS FURTHER ORDERED that the \$5,000.00 bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until this PI Order is terminated.

### **IV. Unsealing Order**

WHEREAS, the reasons for keeping the documents in this case sealed no longer exist, it is FURTHER ORDERED that the Clerk of Court is hereby directed to unseal all the documents previously filed under seal in this case.

**SO ORDERED.**

SIGNED this \_\_\_\_ day of \_\_\_\_\_, 2025, at \_\_\_\_\_.m.  
Pittsburgh, Pennsylvania

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<sup>5</sup> The data produced to Plaintiff shall include the data and documents required to be collected by the Federal Trade Commission, pursuant to 15 U.S.C. § 45f; *See also* Pennsylvania Unfair Trade Practices and Consumer Protection Law, 73 P.S. §§ 201-1, *et seq.* (requiring Third Party Service Providers to collect and keep records pertaining to identities and locations of high volume sellers, as well as financial documents, including, W-8s and W-9s)

## Schedule “A”

### Defendants with Store Name and Seller ID

Defendant Number	Store/Seller Name	Seller ID
1	YIQIYOU	A2Y6BME7R5DYG2
2	qihongli	A15YRDKKZ4SMTV
3	xuchangxingshan	A3MWE5B77M36EH
4	Dempiire	A1L3XWWMTPIQHO
5	SHANyin	A885G01IROBAS
6	hefengxianxianghuixinwujinyouxiangongsi	A15908XHDO71F5
7	ZKWLXS	A3V0ICL3F2NEH0
8	JIAmIN	ASN2VX4OL87H4
9	HDD Sotre	A3QODMYNYD80FJ
10	Neva Textile	AY8R6J7KP9WLH
11	juanjuan store	A31X87JTZA7IO1
12	DAIlais	A20KL8E4P0K0UX
13	ENzuO	A2NAUH39VJZT3C
14	Zigmwt	A39J9AGSJCG8CW
15	ZHIZHOU	A286K0H1TAVTTG
16	HuiZHen	A293KIEQUDRE5D
17	WEIfENG	A24HBRDTHNE9B
18	GuangZhouRunFengDaJiaJuYouXianGongSi	AF3POK9ZQWG6E
19	Hoirt	A3H9L0IVIZOLST
20	Lluwjie	A21ENK1OOGNCOL
21	XIBEIDIANZI	A1YI18DMYXLI9B
22	SYJHHW-GS	AA71A96YG89X9
23	GuangZhouQiFangKeJiYouXianGongSi	A2MTS17INWWMPX
24	ASWZjhr	ALN0XJ2L7MGQ7
25	GUijsfed	A1AMIMW7F3YS51
26	QiWoDianZiShangWuYouXianGongSi	AHOX0SN5BSGWI
27	YOUKELAI	A13KCYETWH0OWO
28	Mancaogongsi	A2TJ8EDER57RD7
29	boyanhaidianzishangwuyouxiangongsi	A3Q9MSL9R5K0HQ
30	zhiyixiahe	A1RL8RDBKAYNSR
31	Lusbees	A2YKXM0HPNWRO2
32	jihehome	A2TAYHZYJMXJD9
33	Galiang	A1QV7XQJ646QUJ
34	QINGKEJIANDI	A1R5UT035G82LZ
35	xingfengshangmaoyouxiangongsi	A21U6IM7GBGO0N
36	XIOcong	A2BP7D50GF4IBC
37	mowuSF	A3EYDU2EWT37JZ
38	ZHKWLXS	A2UXIFJ9T5LL26
39	CHIDasq	ASDP788HY7R4A

40	Douduang	A1U6SZMBP19WP3
41	Meeldib	A2XXJR1HYIN1E9
42	Huefoam Wall Art	A2AWVTEOUYJD7R
43	ESTART	AAD9OZJ7MZM4I
44	Siticoto	A3CP8YVJ2MAGKA
45	SEMMGO	A1JLDCO0KYP60
46	RBPRIDE	A17JCSPXA57LFW
47	zhongqiangshangmaoyouxiangongsi	AE0TJUO5XI6BL
48	HuanZhiLian	A19W5OC3AYQZQL
49	Happy wall art	A3I4FDDB59JB12
50	Artwork Prints Decor	A33922EFBB3O7D
51	KHAKI DECORATION	A3TB7X08UK4UY1
52	Redriver	A3Q8SSSAXDGPIH
53	babyHUIH	A1SS48S1QGUAM8
54	XInshw	A3B6XQBI1DQCNC
55	Yoetaun	A1F7FDIKEDQ3B6
56	tqyijhy	A1K0TRX3NVTDZA
57	xianyoujihanjumaoyiyouxiangongsi	A1K42WYBLC9HLC
58	Star Art Deco Poster Shop	A2JDW48ZMSZYFD
59	Extraordinary u Art Deco Store	A1ALPW5R2HSYN9
60	Eflaintes Store	A27LYAJW1S579D
61	HIWX	AIQPLIX3TGIUV
62	Symphony of Decor	A1XOZJPJ7JY1DQ
63	HSP Art Store	A39MFJIK0NSB5I
64	suo miao	AU4FXX1CBJ3FF
65	Ecyanlv Arrt-Canvas	A19KVAM5730L75
66	aganshangmao	A3RNEQJQ4J893P
67	zhanghailili	A1SUB7MVMZZ3W6
68	YEOOW	A2CZAPEBS3SM5H
69	Lime Trading	A167MMWUQKPYUM
70	Gubiyu Art	AL2EU444ISCFJ
71	DALABA ART	A2PUSHX9X814FQ
72	Pinliang canvas painting	A3QAXJG9KHO81C
73	Sensory Art	A3KVBPHYO2CNEV
74	WORLD	A13VO7O5BX4GN5
75	ruling	A5CYHOVGML57O
76	TuoMei Inc	A1X6NMDMZGYB5U
77	ShengLong Inc	A3KAHH067FFGW2
78	wuwenfan01	A2TMTF3PUKM0HK
79	suzhoucaizongrenmaoyiyouxiangongsi	ANQOULDZ3BI16
80	JXM Store	A36GMXGG0RHB02
81	ART SOURCE IMP&EXP CO.,LTD	A1GKE739X3LAOV
82	YYF Deco	101654655
83	LikeYAO	101661686
84	Uhansl	101685292

85	TYHanue	101678050
86	Bngzhgl	102483951
87	JPGIF	102487546
88	HUMORAND	101680608
89	MINGS	101678927
90	Yuandie	102574863
91	ZXCouiao	102494981
92	Asibei Co.ltd	101646444
93	Follure	101676603
94	WUYUH	101668509
95	WULANLA	101676646
96	EQRBITXL	101663350
97	Chenqiufeng	101686238
98	Hjuang	101655034
99	YaErRui	101495899
100	yindalun	101653115
101	ZGBH	102485971
102	MQjiaju	101663776
103	Abrahamli	101681540
104	ruchs	102478901
105	wsawfh	102489948
106	zhengtao	102610194
107	Loyxs	102477639
108	AFTRYG	102561832
109	WanXin	102574813
110	YHETTY	102561772
111	guangzhoushiyuanziqinwanjuyouxiangongsi	101679118
112	UEBXS	101671100
113	Xinduolei Fashion Center	101620656
114	JENIKRCloth	101646700
115	Anideon	101657009
116	yinliting	102506728
117	KTFETY	102561809
118	Orangejuzi	102480499
119	yuesx	101671228
120	QHZuao	101696662
121	ISHiK	102584293
122	LaboteSI	102562265
123	QYXinue	101679215
124	OTdpuo	101656893
125	laiersty	102549098
126	mIYEX	102487493
127	BFYSFBAIG	102506639
128	Yoland	102477689
129	AaSFJEG	101576708

130	guangzhouruixinyikejiyouxiangongsi	101679187
131	Wyzesi	102486340
132	QIEhedxw	102500638
133	yrycsq	102513692
134	PUISBXS	101647633
135	YUYRY	102501171
136	DEYIOU	101684523
137	liuguozhong	101651419
138	TunChangWeiBangXianShangMaoYouXianGongSi	101643153
139	zhouhang	102483206
140	Cao Famous officials Toys	101680731
141	kunmingyanrendianzishangwuyouxianzerengongsi	101631192
142	zongxianmaoyi	101651715