

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

ELIZABETH'S STUDIO LLC,

Plaintiff,

v.

J EEEEE, LLLLLLA, JE, OEN N,  
TYOURS, SWIFTBUY Y, S E IAFRY,  
COLORFUL DESIGNS, AHLI FASHION  
SHOP, YAORUI CLOTHING, CHARMING  
RED ROSE, CANSHENG,  
SZSBAQJYGFSSH, CHENSHOUS  
CLOTHING, WM COTHING, YZMM,  
RONGTAO, INPETALA, LAIEN  
FASHION, YC WOMEN CLOTHING,  
WESTERN DREAM CLOTHING,  
MANDIYTOU, GET RICH EASILY,  
ROMANTIC MOONLIGHT, COINTREAU  
TEXTILE CO LTD, GOSTARLIGHT,  
TAGEIBAIHUO, LIXIAO HOME,  
FREEDA, ACCUMULATE WEALTH  
CASE, COOL COOL MENS, LQHAT,  
BYUANFUJIAFANG, ELLA A,  
SOCKSTARS, RUIYAO, LEH CLOTHING,  
LIYUAN TEXTILE, XIAORONG REN  
HOME TEXTILE, HLJP EE, HLJP II,  
WENMENGABCD, TENGXIANGHOME,  
YI CHEN JIAFANG, TRENDPICK MENS  
HOODIES, XTONGG, WOMENS  
CLOTHING PRINTS, BBLANS, THO,  
CAIHONG APPAREL, DIVINES,  
FENGSHANGJIARENFUZHUANG, RSDM,  
MEISHIYA WOMENS CLOTHING,  
YOUMEIBAOLIAN, FASHIONABLE  
MODERN GIRL, KIDS FSAHION WEAR,  
MIMOTORA, MID AND OLD LIFE,  
LINGLILI, BEAUTIFUL PARTY TIME,  
GZI WOMENS CLOTHING, OYTFSCC,  
LEISURECITY, QWSTAR, GREEN  
MONSTER SHOP, PIUMPCLOTHING,  
WITHIN BOUNDS, HUNK COSTUME,  
WENGWENG, XINHUIMEI,

Civil Action No.

**FILED UNDER SEAL**

GENIUSPRINCE, FLASHING STYLE  
STUDIO, MATURE MALE, LSADORAER,  
CODY CLOTHING TWO, JOYCESER,  
DEVINDU, TF MAN CLOTHING, RUN  
SUIT, XIWEIXI CLOTHING, WYWQ,  
SOUTHERN CLOTHING STYLE,  
SHANGRAO RUIXING CLOTHING CO,  
RONALDOE, KARIDA KIDS  
CLOTHINGS, YRSWEET DRESS,  
AURARA, YY STYLE, PARK OF  
MOUNTAIN, YSYISHENG, YAOHAN S  
FAMILY, YD MAN CLOTHING, ORDOSE,  
METRONSF, CUPIDS WARDROBE,  
DRAGON AND DOUBLE HORSE  
FASHION CLOTHING, LARGE WOMENS  
CASUAL STYLE, FANHIPFANJIAYOU,  
SONJA, AH HAOS CLOTHING,  
PLUSBEAUTIFUL, CHEN WOMENS  
DRESS, MW WOMEN CLOTHING,  
TIANA, QINGSONGZHUAN, WWWEE,  
SUSULING, HMNZ, HMNZZZ,  
QIANZHIYI CHILDRENS CLOTHING,  
CLCLOTHINGSTUDIO, QIQICLOTHING,  
BOSSS MENS CLOTHING, SELECTED  
LITTLE ANGEL CLOTHING,  
JINGYANGSKIRT, RICHPLUS, BAR  
PAINTING, SHINING STARRY GIRL,  
MEET DAISY, MANNINI,  
YINGDIANNVXIE, QIULAN WOMEN  
SHOES, LILUYA WOMENS SHOES,  
BEAUTIFUL ELEGANT SHOES, STYLE  
VOGUE SHOES, YARUXIEYE,  
HUIKUINVXIE, HEXINVXIE,  
QIANMEIZINVXIE, LINGHESHISHANG,  
LQBESTHATS, SO YOUNG,  
MAOYISHANGJIA, WHEREISART B,  
WHL GOODS, RICK FASHION, YOU  
BAG, FUN AND FASHIONABLE BAGS,  
CHOUU, A SWEET LITTLE HOME,  
BLANKET FLYING PIG,  
DAISYBLANKET, YBYDIAN,  
YULIANIAJU, SNAZZY, COZY  
BOUTIQUE OF FEI, GOLDIEZZZ, FABRIC  
ART, VOLETTA, CHONGYUE SHOP, CAR  
CUSHION, LI AO, HULLUTER, YUANHE  
AUTO PARTS, BIG EARS CAR

INTERIOR, TOADDIT, JEATNOILY,  
HOSHINO PHONE CASE, CH RAINBOW,  
BUY HUNDRED PHONE CASES, SIMPLE  
FASHION PHONE CASE, TOP CASE,  
XHLSHOP, TRENDY TRENDSETTER,  
CHIC CASES, ALL CASES CLUB,  
KIKISHOP, CASELIFE, GOOD LUCKY  
PHONE CASE, WE SHOP CASES,  
CASETALK, CASESTORY, SERHOO A,  
XOXOL, QILONG BOUTIQUE  
EXCLUSIVE, CAR STEERING WHEEL  
COVERS, WANGFENGWEIR, IAISEO,  
ETERNAL COMFORT, TSVAGA,  
POCLLIT, TEESA, XINMEI PHONE CASE,

Defendants.

**[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.

Specifically, Plaintiff has obtained evidence clearly demonstrating that Defendants are using, without authorization, Plaintiff's copyrighted Work. Defendants are manufacturing, exporting, advertising, marketing, promoting, distributing, offering for sale and/or selling unlicensed and infringing versions of Plaintiff's products. Defendants are accomplishing their illegal sales through the Temu online marketplace. Defendants regularly delete and create new

storefronts to avoid Plaintiff's policing efforts, allowing them to conceal their identity and avoid liability.

Based on this evidence, Plaintiff's Complaint alleges claims for federal copyright infringement pursuant to 17 U.S.C. § 501(a).

### **FACTUAL FINDINGS & CONCLUSION OF LAW**

1. Plaintiff, Elizabeth's Studio LLC, is likely to prevail on its copyright claims at trial.

2. Plaintiff's Tucson Collection - 497 Terracotta Work has unique designs that are inherently distinct features, including, color, size, and shape selections, that all function as a source identifier for the Plaintiff's work. The combined distinct features of the Plaintiff's Work all support the copyright registrations issued by the U.S. Copyright Office. Photos of Plaintiff's copyrighted work along with the copyright registration number are available in **Complaint Exhibit 1**.

3. The combined unique features—ornamental and decorative—of Plaintiff's Work comprises Plaintiff's valuable intellectual property ("IP") and all have become distinct in consumer's minds such that consumers associate this IP with Plaintiff's art.

4. Defendants, by operating on 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 the constituent elements of Plaintiff's original

copyrighted work. Defendants' infringing works are virtually indistinguishable from Plaintiff's original work.<sup>1</sup>

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 store. 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 Work without authorization and the products that each Defendant is offering for sale are not genuine products.

6. 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 the constituent elements of Plaintiff's copyrighted work.

7. Plaintiff and 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. Defendants' sale of the infringing products deprives Plaintiff of visibility online, raising costs of marketing its copyrighted work as well as costs to educate consumers about the original work. The market price of Plaintiff's original copyrighted work is being diluted due to the low selling price of Defendants' infringing work, vastly reducing Plaintiff's profits, endangering the sustainability of its business. Defendants are additionally causing a steep degradation of the goodwill that Plaintiff has built up over years with customers.

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<sup>1</sup> See Complaint ¶ 1 for side-by-side comparison of Plaintiff's original copyrighted work and Defendants' infringing works.

Defendants are also depriving Plaintiff of the ability to control the creative content and quality of its work as well as the ability to license the valuable copyright.

8. There is good cause to believe that the unauthorized and unlicensed use of Plaintiff's Work 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 work and an unnatural erosion of the legitimate marketplace in which it operates. 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.

9. 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, if such relief is not issued. Courts have repeatedly held that an infringing party acts at their own peril and issuing a temporary restraining order is simply requesting the infringing party to cease doing what they had no right to do initially.<sup>2</sup>

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<sup>2</sup> See *Phillip Morris USA Inc. v. Bros. Grocery Corp.*, 2014 U.S. Dist. LEXIS 112274, at \*13 (E.D.N.Y. 2014) (citing *New York City Triathlon, LLC v. NYC Triathlon Club, Inc.*, 704 F. Supp. 2d 305, 344 (S.D.N.Y. 2010)); see *Warner Bros. Entm't, Inc. v. WTV Sys.*, 824 F. Supp. 2d 1003, 1014–15 (C.D. Cal. 2011); *Concrete Mach. Co. v. Classic Lawn Ornaments, Inc.*, 843 F.2d 600, 612 (1st Cir. 1988) (quoting *Helene Curtis Industries v. Church & Dwight Co., Inc.*, 560 F.2d 1325, 1333 (7th Cir. 1977) (“Where the only hardship that the defendant will suffer is lost profits from an activity which has been shown likely to be infringing, such an argument in defense ‘merits little equitable consideration.’”).

10. The public interest favors issuance of the temporary restraining order in order to protect Plaintiff's interests and protect the public from being injured, deceived, and defrauded by the passing off of Defendants substandard goods as Plaintiff's genuine art and prints. Public interest additionally favors upholding copyright protections by reinforcing virtues of free expression, as envisioned by the United States Constitution.

11. Under Pennsylvania law, this Court may issue a prejudgment asset restraint where Plaintiff's complaint asserts a claim for money damages.<sup>3</sup> This Court also has the inherent authority to issue a prejudgment asset restraint when Plaintiff's complaint seeks relief in equity. According to the Copyright Act, 17 U.S.C. § 504, Plaintiff seeks, among other relief, that Defendants account for and pay to Plaintiff its actual damages and all profits realized by Defendants or statutory damages, 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.

12. 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>3</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).

## **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 Work 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 Plaintiff's Work;
- (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>4</sup> Merchant Storefronts<sup>5</sup> or

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<sup>4</sup> A "User Account" is any and all accounts with online marketplace platform Temu.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>5</sup> As defined in the Complaint, 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 Work 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>6</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>6</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 Temu'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 Plaintiff's Work;

(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, 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, Joybuy, 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 Plaintiff's Work, 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 Plaintiff's Work and is

identified as originating from outside of the United States and unfairly competing with Plaintiff's Work.

## **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, by **ZoomGov** on the \_\_\_ day of \_\_\_\_\_ 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 \_\_\_\_\_, 2025. Plaintiff shall file any Reply papers on or before \_\_\_\_\_, 2025

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>7</sup> 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 (“FRCP”), 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

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<sup>7</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 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).

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>8</sup>; and

- (4) Defendants' unauthorized and unlicensed use of Plaintiff's Work in connection with the distribution, marketing, advertising, offering for sale, or sale of any products, and any products which use Plaintiff's Work.

### **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 \$5000 Dollars (Five Thousand 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 "J EEEEEEE, and all other Defendants identified in the Complaint" that will apply to all Defendants.

**SO ORDERED.**

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

\_\_\_\_\_  
UNITED STATES DISTRICT JUDGE

<sup>8</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)

**Schedule “A”**  
**Defendants with Store Name and Seller ID**

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
1	J eeeee	634418214662424
2	lllllA	6295784089864
3	JE	5000832735744
4	oen N	634418214618061
5	TYOURS	5071758471008
6	SwiftBuY Y	634418216674940
7	S e ia fry	634418216683772
8	colorful designs	634418215450489
9	AHLI FASHION SHOP	634418209319448
10	Yaorui Clothing	634418212868125
11	Charming Red Rose	5184439929969
12	cansheng	3598609741036
13	szsbaqjygfssh	143685221845
14	Chenshous Clothing	634418217987018
15	WM Cothing	634418214080412
16	YZMM	6008209289400
17	rongtao	2569719974081
18	Inpetala	634418213312236
19	Laien Fashion	634418209426909
20	YC Women clothing	634418214205130
21	Western Dream Clothing	4945853157896
22	MANDIYTOU	634418212262347
23	Get rich easily	634418218238375
24	Romantic Moonlight	634418216219171
25	Cointreau Textile Co LTD	634418212683687
26	GoStarlight	634418214525218
27	tageibaihuo	634418215782060
28	LIXIAO HOME	634418214770114
29	FREEDA	634418212768421
30	Accumulate wealth case	634418218487511
31	Cool mens	634418217963986
32	LQHat	634418211450813
33	BYUANFUJIAFANG	634418213744153
34	ELLA A	2703155370000
35	SockStars	634418212687873
36	Ruiyao	118337464363
37	Leh clothing	634418210113616
38	Liyuan Textile	634418213582333
39	Xiaorong Ren Home Textile	634418213431447

40	HLJP EE	634418218962103
41	HLJP II	634418218802474
42	wenmengABCd	634418217925148
43	Tengxianghome	634418216511026
44	YI CHEN JIAFANG	634418214537984
45	TrendPick Mens Hoodies	634418219050223
46	XTONGG	29983820822
47	Womens clothing prints	634418214082802
48	BBLANS	634418215372860
49	THO	634418212471366
50	Caihong Apparel	4604438714734
51	Divines	634418211195229
52	FENGSHANGJIARENFUZHUANG	634418219083799
53	RSDM	6075529722365
54	meishiya Womens clothing	634418217061453
55	Youmeibaolian	634418209550268
56	Fashionable Modern Girl	5666668728058
57	Kids Fshion wear	634418211135459
58	mimotora	6083030765636
59	Mid and Old Life	4933334847472
60	LINGLILI	634418210737692
61	Beautiful party time	634418212997694
62	GZi Womens Clothing	634418216458010
63	OYTFSCC	4625820048991
64	Leisurecity	634418212846471
65	QWSTAR	634418211513843
66	Green Monster Shop	634418211358421
67	piumpclothing	6071791124671
68	Within bounds	634418217678507
69	Hunk costume	634418211995841
70	wengwengg	634418215098553
71	xinhuimei	634418217572652
72	Geniusprince	634418213549033
73	Flashing Style Studio	634418214248160
74	Mature male	634418212811907
75	Lsadoraer	634418217972298
76	Cody clothing Two	634418214793400
77	Joyceser	634418213739919
78	Devindu	634418210263284
79	TF Man Clothing	634418214064737
80	Run suit	634418212354133
81	Xiweixi Clothing	634418216206348
82	WYWQ	634418215024895
83	Southern clothing style	634418217329168
84	Shangrao Ruixing Clothing Co	634418216857058

85	Ronaldoe	634418214430464
86	Karida KIDS clothings	634418217157915
87	YRSweet dress	634418211434323
88	Aurara	323862495981
89	Yy Style	4881909310059
90	PARK of mountain	634418216040126
91	YSyisheng	634418217957377
92	Yaohan S family	883741458454
93	YD Man Clothing	634418214137430
94	ORDOSE	2542964008876
95	METRONSF	634418216357906
96	Cupids Wardrobe	634418214129086
97	Dragon and double horse fashion clothing	634418217495727
98	Large womens casual style	634418215351708
99	FANHIPFANJIAYOU	634418217296025
100	Sonja	4705776264423
101	Ah Haos Clothing	634418212255837
102	PLUSbeautiful	634418211089991
103	Chen Womens dress	634418217053895
104	MW Women Clothing	634418210963203
105	Tiana	634418209525314
106	qingsongzhuan	5607062871146
107	WWWEE	634418211421578
108	SUSULING	634418210725254
109	HMNZ	634418212454680
110	HMNZZZ	634418217475812
111	Qianzhiyi Childrens Clothing	634418216764539
112	CLclothingstudio	3475372340345
113	QiQiclothing	634418214270716
114	Bosss mens clothing	634418216018161
115	Selected Little Angel Clothing	634418214634959
116	JINGYANGSKIRT	634418214545295
117	RICHPLUS	634418211450792
118	bar painting	634418213068780
119	Shining Starry Girl	634418214390407
120	Meet Daisy	2489576404172
121	Mannini	634418211228079
122	yingdiannvxie	634418214604229
123	qiulan women shoes	634418211639127
124	Liluya womens shoes	5690978206480
125	Beautiful Elegant shoes	2321575523044
126	Style Vogue Shoes	634418213460821
127	YARUXIEYE	634418218140470
128	huikuinvxie	634418214605202
129	hexinvxie	634418212042592

130	qianmeizinvxie	634418214703448
131	lingheshishang	634418212241080
132	LqbestHats	634418214815481
133	so yuong	634418218284248
134	maoyishangjia	634418211604540
135	WHEREISART B	634418213717956
136	WHL GOODS	634418212101967
137	Rick fashion	2734125224807
138	YOU BAG	62792639590
139	Fun and fashionable bags	634418216784185
140	CHOUU	634418216412795
141	A Sweet little home	634418218394509
142	Blanket Flying Pig	634418219291144
143	DaisyBlanket	634418212665148
144	ybydian	634418218879142
145	Yulianiaju	634418214117583
146	Snazzy	634418212699479
147	Cozy Boutique of Fei	634418218658080
148	Goldiezzz	634418215102815
149	Fabric art	5385959867812
150	VOLETTA	634418214391634
151	CHONGYUE SHOP	6292197915359
152	Car Cushion	634418209461250
153	LI AO	634418211832094
154	Hulluter	634418212203429
155	YUANHE AUTO PARTS	634418210923510
156	Big ears car interior	634418215732216
157	ToAddit	634418211536182
158	JEATNOILY	634418211531003
159	Hoshino Phone Case	634418217268211
160	CH rainbow	634418219169713
161	Buy Hundred Phone Cases	634418217143781
162	Simple Fashion Phone Case	634418216402914
163	TOP CASE	634418212987340
164	XHLshop	634418217761144
165	Trendy Trendsetter	634418218574031
166	Chic Cases	634418212780058
167	ALL CASES CLUB	634418215712279
168	KiKishop	64535985348
169	CASELIFE	634418212972911
170	Good Lucky Phone Case	634418218066654
171	We Shop Cases	634418218622106
172	Casetalk	634418214873699
173	CASESTORY	634418216085005
174	Serhoo A	634418218540428

175	XOXOI	634418211546616
176	Qilong Boutique Exclusive	634418217667614
177	car steering wheel covers	634418211844949
178	wangfengweiR	634418218824025
179	iAISEO	634418210985580
180	Eternal Comfort	62967305917
181	TSVAGA	601099532003153
182	POCLLit	634418213822666
183	TEESA	634418210657449
184	XinMei phone case	634418218852109