

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

IAN LUSUNG,

Plaintiff,

v.

GUANGZHOUZHAOWENSHANGMAOYOUXIANGONGSI,  
*et al.*,

Defendants

Civil Action No. 25-cv-989

**FILED UNDER SEAL**

**PLAINTIFF’S MOTION TO FILE UNDER SEAL**

This action arises from Defendants’ actions in promoting, advertising, distributing, offering for sale, and selling knock-off versions of Plaintiff’s Copyrights, which infringe at least one claim of the Plaintiff’s Copyrights and some are copying Plaintiff’s photographs and advertising, throughout the United States, including within the Commonwealth of Pennsylvania and this district, by operating fully interactive, commercial Internet based e-commerce stores.

Plaintiff submits this application to the Court to file under seal the documents associated with the above-referenced action, including but not limited to: Plaintiff’s Complaint and exhibits attached thereto; Plaintiff’s *ex parte* application for: a temporary restraining order, an order to show cause why a preliminary injunction should not issue, an asset restraining order, and an order authorizing expedited discovery; Declarations of Ian Lusung, Stanley D. Ference III, and Dee Odell, all in support of Plaintiff’s Application and exhibits attached thereto; and an order authorizing alternative service; and Plaintiff’s *Ex Parte* Motion for an Order Authorizing Alternative Service (collectively “*Ex Parte* Application”).

Good cause exists to file the *Ex Parte* Application under seal. A variety of Courts have granted the relief requested herein in similar cases, recognizing, *inter alia*:

- a. The Internet based e-commerce stores and Seller IDs at issue in the case are under Defendants' complete control.
- b. Defendants have the ability to change the ownership or modify e-commerce store data and content, change payment accounts, redirect consumer traffic to other seller identification names, and transfer assets and the ownership of the Seller IDs.
- c. Such modifications can happen in a short span of time after Defendants are provided with notice of this action.
- d. Defendants can easily electronically transfer and secret the funds sought to be restrained if they obtain advance notice of the relief sought by Plaintiff's *Ex Parte* Application and thereby thwart the Court's ability to grant meaningful relief and can completely erase the status quo.
- e. As Defendants engage in illegal infringing activities, there is no reason for Plaintiff to believe Defendants will make their assets available for recovery.

*See Airigan Solutions, LLC v. Belvia et al.*, 20-cv-284-AJS (W.D. Pa., filed February 26, 2020), *Talisman Designs LLC v. Dasani et al.*, 20-cv-1084-AJS (W.D. Pa., filed July 20, 2020), *Osprey LLC v. PoolWhale et al.*, 20-cv-1253-WSH (W.D. Pa., filed August 24, 2020), *Gorge Design Group LLC, et al. v. Syarme, et al.*, 20-cv-1384-WSS (W.D. Pa., filed September 15, 2020), *Talisman Designs LLC v. AHappyDay et al.*, 20-cv-1915-RJC (W.D. Pa., filed December 9, 2020), *AquaPaw v. AllNice et al.*, 20-cv-1954-CCW (W.D. Pa., filed December 16, 2020),

*Talisman Designs LLC v. Yoomie et al.*, 21-cv-121-AJS (W.D. Pa., filed January 28, 2021),  
*Doggie Dental Inc. et al. v. CDOffice et al.*, 21-cv-271-MRH (W.D. Pa., filed February 25,  
2021), *Broadway Pines LLC v. Shiro House et al.*, 21-cv-406-NR (W.D. Pa., filed March 29,  
2021), *Doggie Dental Inc. et al. v. AvantDigital et al.*, 21-cv-565-MRH (W.D. Pa., filed April  
29, 2021).

Accordingly, Plaintiff respectfully submits that the court file in this action should be  
sealed until the hearing on Plaintiff's Application for an Order to Show Cause Why a  
Preliminary Injunction Should Not Issue or further order of the Court.

A Proposed Order granting the Application to Seal is submitted herewith.

Respectfully submitted,

Dated: July 16, 2025

/s/ Stanley D. Ference III

Stanley D. Ference III

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