

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

ELIZABETH’S STUDIO LLC,

Plaintiffs,

v.

J EEEEEEE, *et al.*,

Defendants.

Civil Action No. 25-cv-543

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 June 06, 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 July 10, 2025, Plaintiff, appeared for the Order to Show Cause Hearing. None of the Defendants filed responses or contested the preliminary injunction order. 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 work¹ 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 the Internet marketplace website Temu.com under their Store Names and Seller Names identified on **Schedule "A"** of the Complaint (the "Seller IDs" ("Infringing or Knock-Off Products")).²

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

¹ Plaintiff has obtained the following copyright registration on its original work used to market and advertise its products: VA 2-406-342 with the title "Tucson" collection – 497 Terracotta" published on April 6, 2015. A true and correct copy of the registration and the deposit copy are attached to the Complaint and marked as **Exhibit 1** ("Plaintiff's Work").

² Plaintiff has indicated that prior to filing this lawsuit, Plaintiff viewed a public seller profile that is published by certain Defendant's storefronts that purports to identify the name and address of the Defendant.

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 June 6, 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 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,³ Merchant Storefronts⁴ or

³ As defined in the Application, a “User Account” is, as defined in the Complaint, any and all accounts with online marketplace platform Temu, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all other persons in active concert with any of them.

⁴ As defined in the Application, a “Merchant Storefront” is any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in products which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them.

any money, securities or other property or assets of Defendants (hereinafter collectively referred to as “Defendants’ Assets”);

- (3) effecting assignments or transfers, forming new entities or associations, or creating and/or utilizing any other platform, User Account, Merchant Storefront or any other means of importation, exportation, advertising, marketing, promotion, distribution, and/or display for the purposes of circumventing or otherwise avoiding the prohibitions set forth in this Order;
- (4) each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order shall immediately discontinue use of the Plaintiff’s 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 work 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 Whaleco Inc., a Delaware Corporation, which is a wholly owned subsidiary of Pinduoduo Inc. which is owned by PDD Holdings (collectively, “Temu”), (“Third Party Service Provider(s)”) PayPal, Inc. d/b/a paypal.com (“PayPal”), (“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;⁵

(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

⁵ 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.

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 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 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, Temu, 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 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 Products.

II. Order Authorizing Expedited Discovery

A. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

(1) Plaintiffs 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) Plaintiffs 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) Plaintiffs 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 Storefronts⁶; 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.

⁶ 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.)

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

UNITED STATES DISTRICT JUDGE

Schedule “A”
Defendants with Store Name and Seller ID

Defendant Number	Store/Seller Name	Seller ID
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