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

JEFF BARTELS, Plaintiff, v. KP FANTASY SHOP, et al., Defendants.	Civil Action No. 25-cv-1488 **FILED UNDER SEAL**

MOTION FOR 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

Plaintiff now moves this Court for an Order granting their *Ex Parte* Application for: 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 (collectively, the "Defendants"). The legal support for this motion is contained in the accompanying Memorandum of Law. The evidence supporting this motion is contained in the Declarations of Jeff Bartels, Stanley D. Ference III, and Dee Odell, and the exhibits attached thereto. A proposed order is filed herewith.

Respectfully submitted,

Dated: September 30, 2025

/s/ Stanley D. Ference III

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