

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

BARTLEY FORBES,

Plaintiff,

v.

JINGJINGWANG, *et al.*,

Defendants.

Civil Action No. 25-cv-1494

Judge Bissoon

**MOTION FOR PRELIMINARY INJUNCTION**

In connection with this Court’s November 12, 2025 and November 19, 2025 Orders, Plaintiff now moves this Court for an Order granting the Motion for a Preliminary Injunction against the Defendants identified on **Schedule “A”** to the Complaint and attached hereto (collectively, the “Defendants”). The legal support for this motion is contained in the Memorandum of Law. The evidence supporting this motion is contained in the Declarations of Bartley Forbes, Stanley D. Ference III, and Dee Odell, and the exhibits attached thereto. A proposed Order affirmatively granting the relief sought herein is filed herewith.

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Respectfully submitted,

Dated: December 8, 2025

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

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