

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

NICOLETTE RAHNER,

Plaintiff,

Civil Action No. 26-cv-57

v.

XIANCHUANBAIBAI, et al.,

Defendants.

**MOTION FOR PRELIMINARY INJUNCTION**

In connection with this Court’s February 10, 2026 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 Nicolette Rahner, 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: April 17, 2026

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

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