

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

SANDRA HUTTER,

Plaintiff,

v.

NIXUX, et al.,

Defendants.









Case No. 26-cv-270









COMPLAINT FOR DAMAGES AND INJUNCTIVE RELIEF









Plaintiff hereby sues Defendants, the Individuals, Partnerships, and Unincorporated Associations identified on Schedule “A” (collectively “Defendants”). All Defendants are knowingly and intentionally displaying, promoting, advertising, distributing, offering for sale, and selling infringing versions of Plaintiff’s copyrighted works (the “Infringing Products”) on the Amazon.com, Walmart.com, and Temu.com online marketplaces, operating under the seller identities and/or the online marketplace accounts as set forth on **Schedule “A”** hereto (the “Seller IDs” and collectively, the “Defendant Merchant Storefronts”). In support of its claims, Plaintiff alleges as follows:











NATURE OF ACTION



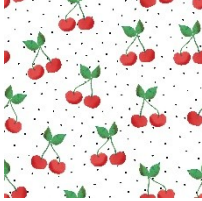







1. Plaintiff is the owner of United States Registered Copyrights which are infringed by Defendants. Each Defendant has infringed at least one of Plaintiff’s Registered Copyrights. Below is a side-by-side comparison of Plaintiff’s copyrighted works and an example of Defendants’ products that embody Plaintiff’s copyrighted works:





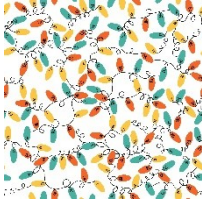





Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-444-256	Cute Easter bunnies seamless kids pattern		 <p>Def #1-30, 223-251, 265</p>
VA 2-446-808	Cowgirl Pattern		 <p>Def #31-62, 252, 266-271</p>
VA 2-444-255	Good luck charms talisman seamless background		 <p>Def #63-90, 253-258</p>
VA 2-444-154	Hang In There Sloth		 <p>Def #91-114, 259, 272</p>











Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-450-561	Flower field bright colors on black pattern		 <p data-bbox="1170 596 1247 632">Def #</p>
VA 2-441-695	Flower Field Pastel Colors on Dark Pattern		 <p data-bbox="1084 1094 1338 1157">Def #115-149, 260, 274-278</p>
VA 2-450-745	Tractors seamless kids pattern		 <p data-bbox="1084 1388 1338 1419">Def #149-159, 279</p>
VA 2-444-153	Aster Dahlia Flowers white on gold brown seamless pattern		 <p data-bbox="1084 1682 1338 1745">Def #160-167, 280-289</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-450-174	Ikat Flower Rhombus Damask Pattern		 <p data-bbox="1084 579 1344 646">Def #168-174, 261-262</p>
VA 2-444-251	Summer beach seamless pattern		 <p data-bbox="1084 999 1344 1066">Def #175-179, 263-264, 291-296</p>
VA 2-444-250	Camping outdoor scene seamless background		 <p data-bbox="1084 1329 1344 1392">Def #180-183, 297-301</p>
VA 2-444-259	Four-leaf clover seamless pattern		 <p data-bbox="1084 1623 1344 1690">Def #184-187, 302</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-419-930	SH_C4_cc4		 <p data-bbox="1081 510 1336 575">Def #188-191, 303-312</p>
VA 2-444-265	Corona Halloween Pumpkin Seamless Pattern		 <p data-bbox="1117 842 1295 873">Def #192-194</p>
VA 2-450-739	Cowboy Horse Ranch seamless pattern		 <p data-bbox="1081 1142 1336 1207">Def #195-197, 313-328</p>
VA 2-444-164	Fall leaf seamless background		 <p data-bbox="1117 1524 1295 1556">Def #198-200</p>
VA 2-450-583	Turkey seamless pattern		 <p data-bbox="1081 1814 1336 1879">Def #201-203, 329-335</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-444-150	Autumn Flower meadow seamless pattern		 Def #204-205
VA 2-450-751	Cherry pattern		 CAPACITY Def #206-207
VA 2-444-252	Fall background		 Def #208-209
VA 2-450-175	Ugly Christmas Pattern		 Def #210-211, 336
VA 2-450-574	Gold foil doodle Christmas trees seamless pattern backdrop		 Def #212,

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-450-744	Abstract plants collage seamless background		 <p data-bbox="1149 569 1268 600">Def #213</p>
VA 2-444-254	Christmas doodle trees background		 <p data-bbox="1149 863 1268 894">Def #214</p>
VA 2-444-264	Christmas lights seamless background		 <p data-bbox="1149 1178 1268 1209">Def #215</p>
VA 2-450-572	Christmas tree seamless pattern repeat tile		 <p data-bbox="1149 1451 1268 1482">Def #216</p>
VA 2-444-249	Cute hand drawn pumpkin border		 <p data-bbox="1149 1766 1268 1797">Def #217</p>

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-450-736	Flip flop summer sandals palm leaves pattern		 <p data-bbox="1149 583 1269 615">Def #218</p>
VA 2-450-566	Halloween 2020 Corona seamless pattern		 <p data-bbox="1149 877 1269 909">Def #219</p>
VA 2-450-575	Large red white and blue flowers seamless pattern		 <p data-bbox="1089 1119 1333 1150">Def #220, 337-338</p>
VA 2-450-746	Seamless background with hats and mittens		 <p data-bbox="1149 1493 1269 1524">Def #221</p>
VA 2-450-102	Thanksgiving Pattern		 <p data-bbox="1149 1776 1269 1808">Def #222</p>

JURISDICTION AND VENUE

2. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Federal Copyright Act, 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)–(b), and 28 U.S.C. § 1331.

3. Personal jurisdiction over each Defendant satisfies constitutional due process because each Defendant has purposefully directed and expressly aimed its tortious activities at the Commonwealth of Pennsylvania and established sufficient minimum contacts with Pennsylvania by, among other things, be willing to accept an order for a product bearing Plaintiff's copyrighted designs from a representative of Plaintiff with a Pennsylvania address, be willing to ship the product to that representative in Pennsylvania, and be willing to collecting Pennsylvania sales tax. In addition, upon information and belief, each Defendant has sold additional products bearing Plaintiff's copyrighted designs to consumers within Pennsylvania not affiliated in any way with Plaintiff through the regular course of business, with the knowledge that Plaintiff is harmed in Pennsylvania as a result of its sales of infringing products to Pennsylvania residents. Plaintiff's claims arise out of and relate to Defendants' sales of infringing products bearing Plaintiff's copyrighted designs to Pennsylvania residents through the regular course of business.

Personal jurisdiction over each Defendant also satisfies constitutional due process because the causes of action asserted herein, including copyright infringement, are intentional torts, were aimed at Pennsylvania, and caused harm that each Defendant should have anticipated would be suffered by Plaintiff in Pennsylvania.

3. Upon information and belief, Defendants have cooperated, communicated, shared information, and coordinated their efforts in order to create an infringing marketplace operating in parallel to the legitimate marketplace of Plaintiff and third parties authorized to sell products

embodying Plaintiff's copyrighted works, including: employing and benefitting from substantially similar paid advertising, marketing, and advertising strategies (*e.g.*, search engine optimization or "SEO"), in order to make their online storefronts appear more relevant and target a consumer searching for products embodying Plaintiff's copyrighted works. By their actions, in addition to the damages associated with unauthorized use of Plaintiff's copyrighted works, Defendants are causing concurrent and irreparable harm to Plaintiff and the consuming public by: (1) reducing the online visibility of Plaintiff's copyrighted works; (2) diluting and eroding the retail market price for Plaintiff's copyrighted works; (3) causing overall degradation of the value of goodwill associated with Plaintiff's copyrighted works; (4) devaluing the exclusivity that enhances the worth of Plaintiff's art and reputation; and (5) increasing Plaintiff's overall cost to market its goods and educate consumers about Plaintiff's copyrighted works.

4. Upon information and belief, Defendants are aware of Plaintiff and Plaintiff's copyrighted works and are aware that their infringement is likely to cause harm to Plaintiff in Pennsylvania.

5. Plaintiff is suffering irreparable and indivisible injury and has suffered substantial damages as a result of Defendants' unauthorized sale of the Infringing Products in direct competition with Plaintiff.

6. Personal jurisdiction over each Defendant satisfies the Pennsylvania long-arm statute, and therefore Rule 4(k)(1)(A) of the Federal Rules of Civil procedure. 42 Pa. Cons. Stat. § 5322 (a) provides in pertinent part: "A tribunal of this Commonwealth may exercise personal jurisdiction over a person ... as to a cause of action or other matter arising from such person: (1) Transacting any business in this Commonwealth. Without excluding other acts which may constitute transacting business for the purpose of this paragraph: (ii) The doing of a single act in

this Commonwealth for the purpose of thereby realizing pecuniary benefit ... (3) Causing harm or tortious injury by an act or omission in this Commonwealth. (4) Causing harm or tortious injury by an act or omission outside this Commonwealth ... (10) Committing any violation within the jurisdiction of the Commonwealth of any statute, home rule charter, local ordinance or resolution, or rule or regulation promulgated thereunder by any government unit or of any order of court or other government unit.” Defendants are subject to jurisdiction under the Pennsylvania long-arm statute because, upon information and belief, Defendants have committed the intentional tort of copyright infringement in Pennsylvania by displaying Plaintiff’s Works in Pennsylvania, accepted orders from Pennsylvania residents, shipped infringing products into Pennsylvania, and collected Pennsylvania sales tax on such orders.

7. By virtue of the civil conspiracy claim in Count II of this Complaint, the Pennsylvania contacts of each Defendant are imputed to every other Defendant because, upon information and belief, each Defendant was aware of, or should have been aware of, the actions of the other co-conspirators.

8. By virtue of the civil conspiracy claim in Count II of this Complaint and the allegations of coordinated actions by Defendants, Plaintiff’s claims against Defendants arise out of the same series of transactions and occurrences.

9. Venue is proper in this Court pursuant to 28 U.S.C. § 1391: Defendants do not reside in the United States and are subject to venue in any district. Further, Defendants solicit business from this Judicial District and, upon information and belief, conduct and transact significant business in this Judicial District.

INTRODUCTION

10. Plaintiff, Sandra Hutter, is the owner of several federal copyright registrations that protect the creative content of Plaintiff's images. The copyrights each protect one of many works of art by Sandra Hutter who is an illustrator and surface pattern designer based in Vienna, Austria. She creates colorful, bold, and feel-good artwork that can be found on printed products such as fabric, wallpaper, gift wrap, home décor, apparel, greeting cards, and much more. Her work includes creations for TJX and American Greetings.

11. This action has been filed by Plaintiff to combat online copyright infringers who trade upon Plaintiff's reputation, goodwill, and valuable copyrights by selling and/or offering for sale products in connection with Plaintiff's images. In addition, the Defendants are selling unauthorized products that are based on and derived from the copyrighted subject matter of Plaintiff's images.

12. Plaintiff is the owner of United States Copyright Registration Nos. VA 2-444-256, VA 2-446-808, VA 2-444-255, VA 2-444-154, VA 2-450-561, VA 2-441-695, VA 2-450-745, VA 2-444-153, VA 2-450-174, VA 2-444-251, VA 2-444-250, VA 2-444-259, VA 2-419-930, VA 2-444-265, VA 2-450-739, VA 2-444-164, VA 2-450-583, VA 2-444-150, VA 2-450-751, VA 2-444-252, VA 2-450-175, VA 2-450-574, VA 2-450-744, VA 2-444-254, VA 2-444-264, VA 2-450-572, VA 2-444-249, VA 2-450-736, VA 2-450-566, VA 2-450-575, VA 2-450-746, and VA 2-450-102 (the "Plaintiff's Works"). These registrations are valid, subsisting, and in full force and effect. True and correct copies of the registration certificates for the Plaintiff's Works are attached hereto as **Exhibit 1**. Upon information and belief, the copyrights have effective dates that predate the Defendants' acts of copyright infringement.

13. In an effort to illegally profit from the creative content of the Plaintiff's Works, Defendants have created numerous Defendant Merchant Storefronts and designed them to appear to be selling authorized Plaintiff's Works.

14. The Defendant Merchant Storefronts share unique identifiers, such as design elements and similarities of the unauthorized products offered for sale, establishing a logical relationship between them and suggesting that Defendants' illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal operation. Plaintiff is forced to file this action to combat Defendants' piracy of the Plaintiff's Works. Plaintiff has suffered, and continues to suffer, irreparable harm due to the loss of control over the quality and creative content of Plaintiff's valuable copyrighted works, as well as damage to Plaintiff's reputation, goodwill, and ability to license as a result of Defendants' actions. Accordingly, Plaintiff seeks injunctive and monetary relief.

15. The rise of online retailing, coupled with the ability of e-commerce sites to hide their identities, has made it nearly impossible for policing actions to be undertaken by Plaintiff because taking advantage of takedown procedures to remove infringing products would be an ineffective and endless game of whack-a-mole against the mass piracy that is occurring over the internet. Sadly, a swarm of infringers have decided to trade upon Plaintiff's reputation, goodwill, and valuable copyrights by selling and/or offering for sale products in connection with Plaintiff's images. The aggregated effect of the mass piracy that is taking place has overwhelmed Plaintiff and Plaintiff's ability to police Plaintiff's rights against the dozens of anonymous defendants who are selling illegal infringing products at prices well below an original.

16. To be able to offer the infringing products at a price substantially below the cost of original, while still being able to turn a profit after absorbing the cost of manufacturing, advertising, and shipping requires an economy of scale only achievable through a cooperative effort throughout the supply chain. As Homeland Security's recent report confirms, infringers act in concert through coordinated supply chains and distribution networks to unfairly compete with legitimate brand owners while generating huge profits for the illegal pirating network:

Historically, many counterfeits were distributed through swap meets and individual sellers located on street corners. Today, counterfeits are being trafficked through vast e-commerce supply chains in concert with marketing, sales, and distribution networks. **The ability of e-commerce platforms to aggregate information and reduce transportation and search costs for consumers provides a big advantage over brick-and-mortar retailers. Because of this, sellers on digital platforms have consumer visibility well beyond the seller's natural geographical sales area.**

...

Selling counterfeit and pirated goods through e-commerce is a highly profitable activity: production costs are low, millions of potential customers are available online, transactions are convenient, and listing on well-branded e-commerce platforms provides an air of legitimacy.

...

The impact of counterfeit and pirated goods is broader than just unfair competition. Law enforcement officials have uncovered intricate links between the sale of counterfeit goods and transnational organized crime. **A study by the Better Business Bureau notes that the financial operations supporting counterfeit goods typically require central coordination**, making these activities attractive for organized crime, with groups such as the Mafia and the Japanese Yakuza heavily involved. Criminal organizations use coerced and child labor to manufacture and sell counterfeit goods. In some cases, the proceeds from counterfeit sales may be supporting terrorism and dictatorships throughout the world.

See Department of Homeland Security, *Combating Trafficking in Counterfeit and Pirated Goods*, Jan. 24, 2020, (<https://www.dhs.gov/publication/combating-trafficking-counterfeit-and-pirated-goods>), at 10, 19 (emphasis added) attached hereto as **Exhibit 2**.

17. The Defendant Merchant Storefronts share unique identifiers, such as design elements and similarities of the unauthorized products offered for sale, establishing a logical

relationship between them and suggesting that Defendants' illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. Defendants use aliases to avoid liability by going to great lengths to conceal both their identities as well as the full scope and interworking of their illegal network. Despite deterrents such as takedowns and other measures, the use of aliases enables infringers to stymie authorities:

The scale of counterfeit activity online is evidenced as well by the significant efforts e-commerce platforms themselves have had to undertake. A major e-commerce platform reports that its proactive efforts prevented over 1 million suspected bad actors from publishing a single product for sale through its platform and blocked over 3 billion suspected counterfeit listings from being published to their marketplace. Despite efforts such as these, private sector actions have not been sufficient to prevent the importation and sale of a wide variety and large volume of counterfeit and pirated goods to the American public.

...

A counterfeiter seeking to distribute fake products will typically set up one or more accounts on online third-party marketplaces. The ability to rapidly proliferate third-party online marketplaces greatly complicates enforcement efforts, especially for intellectual property rights holders. Rapid proliferation also allows counterfeiters to hop from one profile to the next even if the original site is taken down or blocked. On these sites, online counterfeiters can misrepresent products by posting pictures of authentic goods while simultaneously selling and shipping counterfeit versions.

...

Not only can counterfeiters set up their virtual storefronts quickly and easily, but they can also set up new virtual storefronts when their existing storefronts are shut down by either law enforcement or through voluntary initiatives set up by other stakeholders such as market platforms, advertisers, or payment processors.

Id. at 5, 11, 12.

18. Plaintiff has been and continues to be irreparably harmed through the loss of control over Plaintiff's reputation, goodwill, ability to license, and the quality of goods featuring the Plaintiff's Works, as well as the devaluation of the exclusivity associated with Plaintiff's art and professional reputation. The rise of eCommerce as a method of supplying goods to the public exposes brand holders and content creators that make significant investments in their products to significant harm from counterfeiters:

Counterfeiting is no longer confined to street-corners and flea markets. The problem has intensified to staggering levels, as shown by a recent Organization for Economic Cooperation and Development (OECD) report, which details a 154 percent increase in counterfeits traded internationally — from \$200 billion in 2005 to \$509 billion in 2016. Similar information collected by the U.S. Department of Homeland Security (DHS) between 2000 and 2018 shows that seizures of infringing goods at U.S. borders have increased 10-fold, from 3,244 seizures per year to 33,810.

...

The rise in consumer use of third-party marketplaces significantly increases the risks and uncertainty for U.S. producers when creating new products. It is no longer enough for a small business to develop a product with significant local consumer demand and then use that revenue to grow the business regionally, nationally, and internationally with the brand protection efforts expanding in step. Instead, with the international scope of e-commerce platforms, once a small business exposes itself to the benefits of placing products online — which creates a geographic scope far greater than its more limited brand protection efforts can handle — it begins to face increased foreign infringement threat.

...

Moreover, as costs to enter the online market have come down, such market entry is happening earlier and earlier in the product cycle, further enhancing risk. If a new product is a success, counterfeiters will attempt, often immediately, to outcompete the original seller with lower-cost counterfeit and pirated versions while avoiding the initial investment into research and design.

...

Counterfeiters have taken full advantage of the aura of authenticity and trust that online platforms provide. While e-commerce has supported the launch of thousands of legitimate businesses, their models have also enabled counterfeiters to easily establish attractive “store-fronts” to compete with legitimate businesses.

See Combating Trafficking in Counterfeit and Pirated Goods, Jan. 24, 2020, (**Exhibit 2**) at 4, 8,

11.

19. Not only are the creators and copyright owners harmed, the public is harmed as well:

The rapid growth of e-commerce has revolutionized the way goods are bought and sold, allowing for counterfeit and pirated goods to flood our borders and penetrate our communities and homes. Illicit goods trafficked to American consumers by e-commerce platforms and online third-party marketplaces threaten public health and safety, as well as national security. This illicit activity impacts American innovation and erodes the competitiveness of U.S. manufacturers and workers. The President’s historic memorandum provides a much warranted and long overdue call to action in the U.S. Government’s fight against a massive form of illicit trade that is

inflicting significant harm on American consumers and businesses. This illicit trade must be stopped in its tracks.

Id. at 3, 4. (Underlining in original).

20. Plaintiff's investigation shows that the telltale signs of an illegal piracy ring are present in the instant action. The Defendant Merchant Storefronts share unique identifiers, such as design elements and similarities of the infringing products offered for sale, establishing a logical relationship between them and suggesting that Defendants' illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal piracy operation. Plaintiff is forced to file this action to combat Defendants' infringement of the Plaintiff's Works, as well as to protect unknowing consumers from purchasing unauthorized reproductions of the Plaintiff's Works over the internet.

THE PLAINTIFF

21. Plaintiff, Sandra Hutter, is the owner of the Copyright Registrations that protect the Plaintiff's Works.

22. Sandra Hutter is an illustrator and surface pattern designed based in Vienna, Austria. She graduated from Art and Design School in Austria where she trained in color theory, composition, and history of art and architecture. She creates colorful, bold, and feel-good artwork that can be found on printed products such as fabric, wallpaper, gift wrap, home décor, apparel, greeting cards, and much more. Her work includes creations for TJX and American Greetings.

23. Plaintiff has expended substantial time, money, and other resources developing, advertising, and otherwise promoting his art, including the Plaintiff's Works. Plaintiff has also invested substantial time, money, and effort in building up and developing consumer awareness, goodwill, and recognition in the Plaintiff's Works. As a result, reproductions associated with

Plaintiff are recognized and exclusively associated by consumers, collectors, the public, and the trade as works authorized by Plaintiff.

24. The success of the Plaintiff's Works is due in large part to Plaintiff's marketing, promotional, and distribution efforts.

25. As a result of Plaintiff's efforts, the quality of authorized reproductions, the promotional efforts for Plaintiff's products and designs, press and media coverage, and social media coverage, members of the public have become familiar with the Plaintiff's Works and associate them exclusively with Plaintiff.

26. Plaintiff has made efforts to protect Plaintiff's interests in and to the Plaintiff's Works. No one other than Plaintiff and Plaintiff's licensees are authorized to manufacture, import, export, advertise, create derivative works, offer for sale, or sell any goods utilizing the images of Plaintiff's Works without the express written permission of Plaintiff or Plaintiff's representative.

27. Plaintiff is engaged in the business of distributing a variety of works throughout the world, including within Pennsylvania. Plaintiff, either directly or indirectly, offers for sale and sells Plaintiff's Works within the Commonwealth of Pennsylvania, including via the Internet on https://www.spoonflower.com/profiles/sandra_hutter_designs. Defendants, through the advertising, offering for sale, and sale of infringing versions of Plaintiff's Works are directly and unfairly competing with Plaintiff's economic interests in the Commonwealth of Pennsylvania and causing Plaintiff irreparable harm and damage within this jurisdiction.

28. Like many other artists, Plaintiff suffers ongoing daily and sustained violations of Plaintiff's copyrights at the hands of infringers, such as Defendants, who wrongfully display, reproduce, and infringe Plaintiff's copyrighted works for the twin purposes of (i) duping and confusing the consuming public and (ii) earning substantial profits across their e-commerce stores.

The natural and intended byproduct of Defendants' combined actions is the erosion and destruction of the goodwill associated with Plaintiff's name in Pennsylvania and brand and the destruction of the legitimate market sector in Pennsylvania in which Plaintiff operates. Defendants' marketing and sales of their infringing products in Pennsylvania directly and adversely affects Plaintiff's sales and profits in Pennsylvania.

THE DEFENDANTS

29. Defendants are individuals and business entities who, upon information and belief, reside in the People's Republic of China or other foreign jurisdictions. Defendants conduct business throughout the United States, including within Pennsylvania and in this judicial district, through the operation of the fully interactive commercial websites and online marketplaces operating under the Defendant Merchant Storefronts. Each Defendant targets the United States, including Pennsylvania, and has offered to sell and, on information and belief, has sold and continues to sell illegal reproductions of the Plaintiff's Works to consumers within the United States, including Pennsylvania and in this judicial district.

30. Defendants directly engage in infringing the registered copyright in Plaintiff's Works by advertising, offering for sale, and/or selling goods each bearing and/or using infringements of one or more of Plaintiff's Works to consumers within Pennsylvania through e-commerce stores using, at least, the Defendant Merchant Storefronts, as well as additional ecommerce store or seller identification aliases not yet known to Plaintiff. Defendants have purposefully directed some portion of their unlawful activities toward consumers in the Commonwealth of Pennsylvania through the advertisement, offer to sell, sale, and/or shipment of infringing versions of Plaintiff's works into Pennsylvania.

31. Defendants are using Plaintiff's Works to drive Internet consumer traffic to their e-commerce stores operating under the Defendant Merchant Storefronts, thereby decreasing the size and value of Plaintiff's legitimate Pennsylvania marketplace and intellectual property rights.

THE DEFENDANTS' UNLAWFUL CONDUCT

32. The success of the Plaintiff's Works has resulted in significant copying of the creative content protected by Plaintiff's copyright registrations. Plaintiff has identified numerous fully interactive marketplace listings for infringement of Plaintiff's Works on Amazon, Walmart, and Temu. Each Defendant targets consumers in the United States, including the Commonwealth of Pennsylvania, and has offered to sell and, on information and belief, has sold and continues to sell, infringing products that violate Plaintiff's intellectual property rights in the Plaintiff's Works to consumers within the United States, including the Commonwealth of Pennsylvania.

33. Upon information and belief, Defendants facilitate sales by designing the Defendant Merchant Storefronts so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers selling genuine reproductions of the Plaintiff's Works.

34. The Defendant Merchant Storefronts intentionally conceal their identities and the full scope of their piracy operations in an effort to deter Plaintiff from learning Defendants' true identities and the exact interworking of Defendants' illegal operations. Through their operation of the Defendant Merchant Storefronts, Defendants are directly and personally contributing to, inducing, and engaging in the sale of Infringing Products as alleged, often times as partners, co-conspirators, and/or suppliers. Upon information and belief, Defendants are an interrelated group of infringers working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell Infringing Products.

35. Upon information and belief, at all times relevant hereto, the Defendants in this action have had full knowledge of Plaintiff's ownership of the Plaintiff's Works, including Plaintiff's exclusive right to use and license such intellectual property and the goodwill associated therewith.

36. Defendants often go to great lengths to conceal their identities by often using multiple fictitious names and addresses to register and operate their massive network of Defendant Merchant Storefronts. Upon information and belief, Defendants regularly create new websites and online marketplace accounts on Amazon, Walmart, and Temu using the identities listed in Schedule A to the Complaint, as well as other unknown fictitious names and addresses. Such Defendant Internet Store registration patterns are one of many common tactics used by the Defendants to conceal their identities, the full scope and interworking of their massive pirating operation, and to avoid being shut down.

37. The Infringing Products for sale in the Defendant Merchant Storefronts bear similarities and indicia of being related to one another, suggesting that the Infringing Products were manufactured by and come from a common source and that, upon information and belief, Defendants are coordinating and working in concert to profit from Plaintiff's protected intellectual property.

38. In addition to operating under multiple fictitious names, Defendants in this case and defendants in other similar cases against online infringers use a variety of other common tactics to evade enforcement efforts. For example, infringers like Defendants will often register new online marketplace accounts under new aliases once they receive notice of a lawsuit. Infringers also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border Protection. A 2021 U.S. Customs and Border Protection report on seizure statistics indicated that e-commerce sales accounted for 13.3% of total retail sales with second quarter of 2021 retail e-

commerce sales estimated at \$222.5 billion. U.S. Customs and Border Protection, *Intellectual Property Right Seizure Statistics*, FY 2021 (<https://www.cbp.gov/sites/default/files/assets/documents/2022-Sep/202994%20-%20FY%202021%20IPR%20Seizure%20Statistics%20BOOK.5%20-%20FINAL%20%28508%29.pdf>) at 23. A true and correct copy of CBP’s FY 2021 report is attached hereto as **Exhibit 3**. In FY 2021, there were 213 million express mail shipments and 94 million international mail shipments. *Id.* Nearly 90 percent of all intellectual property seizures occur in the international mail and express environments. *Id.* at 27. The “overwhelming volume of small packages also makes CBP’s ability to identify and interdict high risk packages difficult.” *Id.* at 23.

39. Further, infringers such as Defendants, typically operate multiple credit card merchant accounts and third-party accounts, such as PayPal, Inc. (“PayPal”) accounts, behind layers of payment gateways so that they can continue operation in spite of Plaintiff’s enforcement efforts. Upon information and belief, Defendants maintain offshore bank accounts and regularly move funds from their PayPal accounts to offshore bank accounts outside the jurisdiction of this Court. Indeed, analysis of PayPal transaction logs from previous similar cases indicates that offshore infringers regularly move funds from U.S.-based PayPal accounts to foreign-based bank accounts, such as China-based bank accounts, outside the jurisdiction of this Court.

40. Defendants, without any authorization or license, have knowingly and willfully pirated Plaintiff’s Works in connection with the advertisement, distribution, offering for sale, and sale of illegal products into the United States and Pennsylvania over the internet. Each Defendant Internet Store offers shipping to the United States, including Pennsylvania, and, on information and belief, each Defendant has displayed Plaintiff’s Works, has offered to sell, and has actually sold Infringing Products into the United States, including Pennsylvania.

41. Each Defendant was, and is currently, offering for sale and selling the Infringing Products to the consuming public via Defendants' online storefronts using their Seller IDs. Defendants provide shipping, have actually shipped, and/or stand ready, willing, and able to ship the Infringing Products to customers located within Pennsylvania. Each Defendant has also infringed the copyright in Plaintiff's Works within Pennsylvania by displaying Plaintiff's work within Pennsylvania.

COUNT I
COPYRIGHT INFRINGEMENT

42. Plaintiff repeats and incorporates by reference herein the allegations contained in the above paragraphs of this Complaint.

43. The Plaintiff's Works and authorized reproductions have significant value and have been produced and created at considerable expense.

44. At all relevant times, Plaintiff has been the holder of the pertinent exclusive rights infringed by Defendants, as alleged hereunder, including but not limited to the Plaintiff's Works, including derivative works. The Plaintiff's Works are the subject of valid Copyright Registration Certificates issued by the Register of Copyrights. (**Exhibit 1**).

45. Each Defendant, without the permission or consent of Plaintiff, has sold and continues to sell online pirated derivative works of the copyrighted Plaintiff's Works. Each Defendant has violated Plaintiff's exclusive rights of reproduction and distribution. Each Defendant's actions constitute infringement of Plaintiff's exclusive rights protected under the Copyright Act (17 U.S.C. §101 et seq.).

46. The foregoing acts of infringement constitute a collective enterprise of shared, overlapping facts and have been willful, intentional, and in disregard of and with indifference to the rights of the Plaintiff.

47. As a result of each Defendant's infringement of Plaintiff's exclusive rights under copyright, Plaintiff is entitled to relief pursuant to 17 U.S.C. §504 and to Plaintiff's attorneys' fees and costs pursuant to 17 U.S.C. §505.

48. The conduct of each Defendant is causing and, unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. §§502 and 503, Plaintiff is entitled to injunctive relief prohibiting each Defendant from further infringing Plaintiff's copyrights and ordering that each Defendant destroy all unauthorized copies.

COUNT II
CIVIL CONSPIRACY

49. Plaintiff repeats and adopts and incorporates by reference herein the allegations contained in the above paragraphs of this Complaint.

50. Plaintiff is informed and believes and therefore alleges upon information and belief that Defendants knowingly and voluntarily entered into a scheme and agreement to engage in a combination of unlawful acts and misconduct including, without limitation, a concerted and collaborated effort to maintain the distribution, marketing, advertising, shipping, and sale of products that bear Plaintiff's copyrighted designs.

51. The intent, purpose, and objective of the conspiracy and the underlying combination of unlawful acts and misconduct committed by the Defendants was to unfairly compete against Plaintiff and to profit from Plaintiff's intellectual property.

52. Each Defendant understood and accepted the foregoing scheme and agreed to do its respective part to further accomplish the foregoing intent, purpose, and objective. Thus, by entering into the conspiracy, each Defendant has deliberately, willfully, and maliciously permitted, encouraged, and induced all of the foregoing unlawful acts and misconduct.

53. As a direct and proximate cause of the unlawful acts and misconduct undertaken by each Defendant in furtherance of the conspiracy, Plaintiff has sustained, and unless each Defendant is restrained and enjoined, will continue to sustain severe, immediate, and irreparable harm, damage, and injury for which Plaintiff has no adequate remedy at law.

54. As a result of Defendants' actions alleged herein, Plaintiff is entitled to injunctive relief, an order granting Plaintiff's damages and Defendants' profits stemming from their false advertisements, and exemplary or punitive damages for Defendants' intentional misconduct.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

- 1) That Defendants, their affiliates, officers, agents, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be temporarily, preliminarily, and permanently enjoined and restrained from:
 - a. Using the Plaintiff's Works or any reproductions, copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not an authorized reproduction of the Plaintiff's Works or is not authorized by Plaintiff to be sold in connection with the Plaintiff's Works;
 - b. passing off, inducing, or enabling others to sell or pass off any product or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale under the Plaintiff's Works;
 - c. further infringing the Plaintiff's Works and damaging Plaintiff's goodwill;
 - d. shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory

not authorized by Plaintiff to be sold or offered for sale, and which directly use the images of the Plaintiff's Works, and which are derived from Plaintiff's copyrights in the Plaintiff's Works; and

- e. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendant Merchant Storefronts, or any other online marketplace account that is being used to sell products or inventory not authorized by Plaintiff which are derived from Plaintiff's copyrights in the Plaintiff's Works;

2) Entry of an Order that, upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including any online marketplaces, social media platforms, Facebook, YouTube, LinkedIn, Twitter, internet search engines such as Google, Bing, and Yahoo, web hosts for the Defendant Merchant Storefronts, shall:

- a. disable and cease providing services for any accounts through which Defendants engage in the sale of products not authorized by Plaintiff which reproduce the Plaintiff's Works or are derived from the Plaintiff's Works, including any accounts associated with the Defendants listed on Schedule A;
- b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of products not authorized by Plaintiff which are derived from the Plaintiff's Works; and
- c. take all steps necessary to prevent links to the Defendant accounts identified on Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant accounts from any search index;

3) For Judgment in favor of Plaintiff against Defendants that they have: a) willfully infringed Plaintiff's rights in Plaintiff's federally registered copyrights pursuant to 17 U.S.C. §501;

and b) otherwise injured the business reputation and business of Plaintiff by Defendants' acts and conduct set forth in this Complaint;

4) For Judgment in favor of Plaintiff against Defendants for actual damages or statutory damages pursuant to 17 U.S.C. §504, at the election of Plaintiff, in an amount to be determined at trial;

5) That Plaintiff be awarded Plaintiff's reasonable attorneys' fees and costs;

6) That Plaintiff be awarded punitive damages; and

7) Award any and all other relief that this Court deems just and proper.

DEMAND FOR JURY TRIAL

Plaintiff respectfully demands a trial by jury on all claims.

Respectfully submitted,

Dated: February 12, 2026

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

courts@ferencelaw.com

FERENCE & ASSOCIATES LLC

409 Broad Street

Pittsburgh, Pennsylvania 15143

(412) 741-8400 – Telephone

(412) 741-9292 – Facsimile

Attorneys for Plaintiff

LIST OF EXHIBITS

- Exhibit 1 Registration certificates for the Plaintiff's Works
- Exhibit 2 Department of Homeland Security, *Combating Trafficking in Counterfeit and Pirated Goods*, Jan. 24, 2020 (<https://www.dhs.gov/publication/combating-trafficking-counterfeit-and-pirated-goods>)
- Exhibit 3 U.S. Customs and Border Protection, *Intellectual Property Right Seizure Statistics*, FY 2021
(<https://www.cbp.gov/sites/default/files/assets/documents/2022-Sep/202994%20-%20FY%202021%20IPR%20Seizure%20Statistics%20BOOK.5%20-%20FINAL%20%28508%29.pdf>)

Schedule “A”
Defendants with Store Name and Seller ID

Defendant Number	Store/Seller Name	Seller ID
1	Nlxux	A2YXC0BAA4TMKE
2	My-Door	ANQEGSBDK5TOS
3	HaoBoRong	AXN3E8KW88CT4
4	foshanshichishengjumaoyiyouxiangongsi	A3LYXZ4EAX8QS3
5	FuFuDog	A3Q62RRS9XHGLW
6	Cooper girl	A30UE7RIHJNL88
7	zhijiangzuoxian	AYECP0CWE94N2
8	acawaw13	A1T0XFZLRW8992
9	ZhangBin12	AV673K3BNOE3Y
10	GoodVIS	A25BECGWHE4DUD
11	XXXHZL	A280ZNUJF9WU4P
12	7-14 Days Arrival	A12T59NEYZTX1M
13	Gossibojjk-US	ADXHTCUJFJZO0
14	Spring Summer Clothing Store liangxuemiao	A2AXMIHVZK995H
15	BDNXTV(8-15 days delivery)	A3GYV37MS8PNKQ
16	GuangZhouXiaChaiShangMaoYouXianGongSi	A1WES13MQ2VHNR
17	SPRINGFUN	A38LFRXMBM8NM5
18	yuzhoushiyoutangmaoyishanghang	A1M981XZ2AL1B2
19	fuyangshiguanjujianzhugongchengyouxiangongsi	ADIGBJ082GUFD
20	dazhoushizhaojinnongyekejiyouxiangongsi	AM7UOPSA7MJ
21	PINKUMA	A2HLTW1QFU3WQT
22	pangcailing253	A3KUH5WQEOB232
23	Zonor	A2W6OTGA022PMV
24	Sonzjsportstore	A3TYQ4QDETDEJT
25	Crizmas	APQVTR0P981W2
26	POFATO BAG	A4IFA7GIFQ1Z2
27	hangzhoujiguangpianyukejiyouxiangongsi	A35MYS4DSHENJ4
28	JIU YOU JIA JU	A3R0QJ25A1D4ZS
29	lvjiayi202413	A3L4DVLUKCOB8C
30	jiujiangshibaicongyumaoyiyouxiangongsi	A2D4L86HX1HUDX
31	XiuHu	A31I9BF91VAU8P
32	ChaHu	A1EPEGWT1ET063
33	B-zhilja	AONVHGG1TO1MB
34	DaKing	A12817272P7VSF
35	Vozoza	A1JHMW6287ZGO7
36	Jiahon	A2GHCM3MITDKUY

Defendant Number	Store/Seller Name	Seller ID
37	Bingfone	A14R8V2FH5CLUM
38	Yisharuier	A3M5EZ7R3B6A8A
39	Wusikd	A2XA8SYYE76ISX
40	hexinbaihuodian	A1HYEM6I2NDHXX
41	BieGoGo	A1OVPOJLHDH3R1
42	WOKITEI	A3VVU56Q9URM81
43	CHENLAN	A3NINONFLWV2WI
44	ZEZOUZ	A2HUV6TV4WENY
45	yfqy's shop	A1KBMOYUWESZBP
46	WELLDAY	A1ZP6WO1USDH40
47	Glaphy	AC2ID87AL4D01
48	LsskDG	A5RHA89XNIQH0
49	GLURKY	A3VEOWRJITTRF0
50	YYnh	A1PGX9F2T5Q7R8
51	Odued	A2B2R9W3WKDBMO
52	Yangsa Home Textile	A6FK36NZYRDZN
53	XisoVer	A3MDNGJGPF7QAM
54	YALYVERY Decor	AJ3AKLZQXOE54
55	Li Ming Jue	A2NIKTN20O6L5M
56	xianzhili	A3I9VOWP2JZDQJ
57	HONLERLY Decor	A2LHGDQQU0W942
58	Sveritas wall store	AN4LCZBJP740D
59	Pamnest	A3304DVNZPFGGG
60	RUCPGDN	A3DVHR4RIXCSZX
61	LIGMALO	ALMYZR1BQI05H
62	CCZ Home	A26FJ7ODD9F005
63	Young and luck	A26QKUCGUIVM64
64	shengCY-US	A3LNJS40N6M5Z6
65	zhoukoufumeishangmaoyouxiangongsi	A2LMSZDEQQD3F3
66	baodingyanjuexinxikejiyouxiangongsi	A2LXSSO9CZ7IZN
67	AoJWei Store	A2K9B4J5UH7MM4
68	shujinqiaoseddfs.	AM6BQ07ST2Y2R
69	OURVII DIY U	A3DAZKVS21UCDI
70	TAHYAWOOWO	A3GOB224M1CHAP
71	ANXICACO	AUHGGW1XV57QZ
72	GuangShuiShiLiZhuiLangShangMaoYouXianGongSi	A2FYGRDAMPZEDI
73	Anomadassi	AMCRMY1W0XO7P
74	Haosheng-us	AD6BTC9O6TGT0
75	Lxflorally	A20SMJ3PFP8T4H

Defendant Number	Store/Seller Name	Seller ID
76	RUIJC-US	A1IYJESTXU6RIK
77	YUEYING-US	A2O9BGM4L3GLP4
78	guangxinanninghaonuodianshishangwufuwuyouxiangongsi	A2KCJYU5CFH9XK
79	BinTu	A38ELF50NJPX03
80	wanzaixianzhaoyangfeibaihuodian	AEGSSSE1MFWZI
81	putianshichengxiangqutingyuxinbaihuoshanghang	A31BPNQANP4E51
82	Dadazi	A1ODZQYVNV6MOP
83	zuotaihangnanyangzuohangshangmaoyouxiangongsi	A1SYKKO6M7O5UD
84	zhoukoujiapengshangmaoyouxiangongsi	A3LMLICOHMHGWG
85	kuikuikuichenji	AI0Z82B28VX2X
86	LICENYUANXIAODIAN	AP02Y67L643PT
87	YuZhouShiWeiXuShangMaoYouXianGongSi	A3CBB7U85V74I4
88	XianStyle	A3F3RX6QI4QNTT
89	licaitt	A34UIIA0850F4V
90	lianwen3	A15T0XV3A596RB
91	HonDe	A1T50V22FS0958
92	zhengzhiqi2299	A37D69I15SUAG9
93	Moudou	A38KRXZF9P12PX
94	ChicBag CO.	A1S9CZ6F6QPUP
95	Xiaoyu8888	A12VMWMYXM1JYI
96	VIKKO	A10JWCN9KNNMJ3
97	ZZRZZR	A1TS5T51HAPUGH
98	KEEPREAL	A1TR2J0A9AEHA8
99	ZHIHUISM	A39P5KA0444XBV
100	GKM-GLOBAL	A15CD7CH9P4R4I
101	FJDENG	A2S3OIAHYVXANQ
102	Hljj-US	A1E5BNWCU8HDW8
103	jinrushuang	A3MNGC39E6ELKK
104	siyxyb	A2XA02JOCSR02F
105	chaocai	A307OV6ATDAW5T
106	Moudeng	A69IK32ZE4IJ4
107	hldfc	A3NVU1MP4HEFZT
108	dwjid	A30IE5S0RMB1DU
109	Darani store	A9Q82ZLXBMVMH
110	Mazeann	AI2VLYUJIKW18
111	JUMBEAR	AZDR20VABOITV
112	Leejoan	A123J1NHVWAIUG
113	Hefing	A1R7JWCAUQZYHQ
114	Aflyko	A3AY2B8Z6O3WD1

Defendant Number	Store/Seller Name	Seller ID
115	Zeename	A3R2MTYJCSFILB
116	HONGling	A25I0PRI6BRYX5
117	mybadgeholder	A2OP8YJO0WWP0C
118	GOAYETN	AKZ2LHSNXZNCM
119	HAOGEBAOFU Store	A37GD57HQLTMLP
120	Skycess	A1GK5V6D4LRET1
121	Happy Shopping 9	A1TPOXPQS08Q52
122	linjianbintingfeng1	A3M50O48SMIPRJ
123	SHAOSHAN-june	A10LNCCEMH4YQ9U
124	prioritytop	A1OKXEDDSD7DO0
125	kengsuishangmaoyouxiangongsi	A3GPB03AVPRYD2
126	wjmbhd	A2IT1V7RK4V176
127	qing fan dian zi	AN4G2J6CVCKCC
128	Sacozy Home	A2BTX9V5C2FNB1
129	pengping's shop	A1141R5I2JH20O
130	Yongdun99	AVW2LZQNMVNAZ
131	Leighgan	A10BD09HBI3B57
132	WEI RUN DIAN ZI SHANG MAO	A25LH1H5BOERFS
133	JINANLVYANGBAXINXIKEJIYOUXIANGONGSI	A6934892OCKJ
134	Y B store	A1DBTXVHJLCTB6
135	House KLL	A2A8R3CX29Z4WY
136	CZXW	A2NXSRYSN468YR
137	FLildon	A22MPCBUU4CGY7
138	XOLLAR	ARZN4IEE2IPAE
139	SWEET-HOME-ART	A93RXUEAX48I7
140	YQJS	A3VG4Z3AQIGUQB
141	Facaiy	A3UVZ23B0M4285
142	Hangqihang MADE	A1IGUXZ5MV42YR
143	NEW5	AVT49XFML4Y01
144	Artistic Curtain	A2SDYCBECJJUBN
145	SENSHUOM	A2E6TN58C4TEC1
146	xrhbhd	A2SRNQSH9MUP0Z
147	feihua's shop	A38SULEOGBSYSC
148	EMPOROYA	A1YE5UZSFTZJRV
149	MXGFT	A2ISC71UXADRZE
150	Smell Sunshine	A66WTVLNKT1ON
151	scenery is wonderful	A3LPIQY9DSYYN3
152	N,DXHHopde	A2GH644AACUD50
153	Definition of happiness	A331M1JP7MWT00

Defendant Number	Store/Seller Name	Seller ID
154	Futterya	A3G2GJLGDUPMH
155	Happy host	A90GK909AXNGG
156	WLDSyyDS	A14RCYBL17PZYR
157	CerbonnyDirect	A2454HNDJS77ZK
158	zjqZJQDIWD	A2AKEDI2CTAJ3R
159	Jianjian PRINT	A124RERXUHHCRN
160	Jinrui-us	AKJ3BTS0DRJ4
161	URKFL	A2XRZL0NLHFDWD
162	102rdcfg	A1IVQTNOH3A51A
163	susiyo	A1KU7HH44RORR6
164	Jieying	A1A9UARHB6YBFS
165	EUSOLP	A2OCHCVJWKQR48
166	qiuxuhuyang	A38XQWRK125SN4
167	ARKENY	A1VC81CMGNIX6M
168	GUOHAN'S SHOP	A2B9YDU9CK5E02
169	Plushera-Art	A1XBSA7OHJ4H97
170	Shadoria-art	A32FQB1KP8VUF5
171	MirelloArts	AZW3RONZH5PZL
172	WODAICALLMIURAL	A3MNMA4GEQ6FXA
173	kikyolium	A23BH5JWS8G9TK
174	JINANXUMIANDIANZISHANGMAOYOUXIANGONGSI	AEALIR95O9530
175	WZWUS	A1F4L9L1KEPLNR
176	panweiwei	A1SZO0I5FZNUXE
177	dagoenmgads	AV9SULQND3JWI
178	US Xu	A1PWUPUSDOAU14
179	WangKuiChanWanShangMao	A56UJDSMQ03TG
180	KANEPE	A2IAP1XHHWEYB0
181	BenYaSong	A1OY85HJVOIU01
182	YAODINGHUI	A162CR8K5M1P69
183	CHENGSHIYI	A2LV29SOAUE5YY
184	HANCOLDZE	A1X5GEEXQGLORC
185	Jihqo	A3GUIQZAYQZ600
186	HuaiHuaShiJianPingYouHaiShengWuFangZhiYouXianGongSi	A19VTWIDATPM61
187	Yishuizi Technology	A2LT3TOPD5V3T0
188	ZYANLING SHOP	AKGFU3P5Y9DAZ
189	WUYOUDAMAI	A1TIVO104Y2LG3
190	Gogmael	A3RWWSH5NSANPF
191	EclatWardrobe	A3H273KHAF8L2T
192	PYBUG	A2E45MA96BHUBE

Defendant Number	Store/Seller Name	Seller ID
193	ZZCshop	A211QUDQ9AHN00
194	WAAGOGO	A3ROYEWE45JIII
195	Krafig	A3DSVAS7Y1RDIK
196	dingchuang	A9E57J6J2FL99
197	Whcxiaolilan	A2W9ECCX5PNFPE
198	Burbuja	A1W7T0WSERS4X0
199	BAXIEJ	AG6NYUPUTV5BX
200	shanxishasijinkejyouxiangongsi	A2EQ3G8Z7CB53G
201	KnguhPauaqan US	AF4J480QND3AH
202	ZainProy	A1IEBO2UV39Q5B
203	MYING	A12IDPDDN10ZL6
204	junzan	AG51URJG8JSBE
205	Joy World Store	A32JV5IP9T7FRK
206	PNYOIN	A1OZG7SBEWL7NP
207	ihshop	A2PUR4TZ59ECG1
208	ONEDOUBLE	A19EQ43M17NJPU
209	RuiSenSuJiaoZhiPin	AW9F0XXPDC4DZ
210	MeArtisticGift	A3V7WRGXOLLRZ1
211	Aluy's boutique	A2AB6W4OXXQUBI
212	SZDONGJI	A20YU908JV5SB4
213	mzbusiness	A1GTYZL9GSFUOS
214	Takiito	A23BOBTR4FT690
215	Armanity	A34MEBEO076VH4
216	gongguanlin54243	A2MH6L6IS6UVFY
217	LINSHOP1	A2XRAYAPKOHW20
218	WTTING24	A3IIR7SAZK2IBW
219	Homiehug	A1ZTOFMPNFGZF6
220	CENXINL	ALYEQ7PP4PEPR
221	yinxunning123	A3B85LKPTE3L5E
222	JHGGFFDStore	A2597MFSB8XKPQ
223	Dpytoraw Clothing	101502914
224	Kids And Adult Clothing	101207422
225	ICV 2024	101568187
226	chaoong	102514259
227	XIYON	102752230
228	Hj Smple	101190929
229	Vividxx	102773380
230	tiantianfacai	102596039
231	Lightmans Clothing	101226332

Defendant Number	Store/Seller Name	Seller ID
232	ZCheng	101678998
233	Daily Clothing	101607790
234	WuLidianzi	101343278
235	WZtungb	102634069
236	Qiyuan Store	101209379
237	Xinyi Department Store	101583464
238	Liuxou	102569485
239	HWJ 2025	102655242
240	Hifoo	102655868
241	Chic Wardrobe	102634009
242	newTgna	102570623
243	rtKFRfl	102661419
244	NeHeixna	102577726
245	Biysah	101504759
246	X36 BH	101614230
247	Hleathpo	101348837
248	Klmhd	101633879
249	ZHOGXU	102787470
250	TANYSU	102643447
251	genrty124	101610692
252	YONG SHUO	102808757
253	Yiwu Ruifan Trading Co., Ltd.	102518457
254	Yiwu Taoshi Trading Co., Ltd.	102518342
255	FXZZ DIY	102617365
256	JinruiMY	102515147
257	Yiwu Zhuoling Device Co., Ltd.	102518498
258	Yiwu Lixin Trading Co., Ltd.	102518258
259	JiNanJingFanCo., Ltd	102508059
260	foot year	101246519
261	Cryal wallpapers	101218639
262	Lumnis Lamps	101349623
263	ChuXiongShiJiaYangXian002	101649969
264	Bangyibang Shop	101624802
265	ZESTCART TOWEL	634418220261182
266	DecorVista WallArt	634418216278694
267	StylishAbodes	634418217570517
268	WallCrafters	634418217569394
269	WallWhimsy	634418215923358
270	PatternPalette Wallpapers	634418216592629

Defendant Number	Store/Seller Name	Seller ID
271	ZYGNIX	634418222072134
272	CYQUEENLY	634418222109100
273	Cabin Feeling	634418214104866
274	DreamDwelling	634418219087062
275	Craftopiashop	634418218765602
276	International preference	634418217582500
277	Xyrena	634418216907555
278	chaofancfan	634418224268970
279	PEYANZY	634418213729916
280	EXEShop	634418220666722
281	ZZXia	634418218120563
282	FamilyShopD	634418219642049
283	QJTshop	634418217629674
284	DOPyun	634418218002215
285	AXFamily	634418218749956
286	VibrantHome	634418213699442
287	KKOShop	634418220671774
288	HQfamily	634418218704551
289	BQFamily	634418218758116
290	JIEYOU MI	634418218177701
291	ELAINEY	634418220316600
292	ZYFANGI	634418215302772
293	Parcelly	634418222256866
294	Courage and Strength Home Decor Zq	634418223622622
295	HNXBSH	634418220523717
296	Mason Home decor	634418224360442
297	FabTailor	634418219318247
298	StitchCrafted	634418219815662
299	VividNest	634418217902606
300	ZR MD	634418218940095
301	StitchMuse	634418221423247
302	DesignNestCo	634418219388932
303	A goodlooking carpet	634418218026116
304	Fangjun happy home	634418217346757
305	ZhouDada Baihuo	634418211501158
306	LYouQianHua	634418218324081
307	PURE CLASSY	634418218595118
308	Solara Rug	634418218989510
309	Innovative Rug Studio	634418218483191

Defendant Number	Store/Seller Name	Seller ID
310	Voguevein	634418222664318
311	ArtPalette Gallery	634418222054948
312	AlpineSelect	634418222299331
313	na zha	634418221047681
314	Macho Threads	634418221064674
315	Driver Gallery	634418220605373
316	CoolVibe	634418217307831
317	ModaCraft	634418217950202
318	Fashionlab	634418217309328
319	UniqueBlend	634418219388643
320	TAOXI Tao likes it	634418209359569
321	BlueWave Swim	634418220182930
322	Oschertivan home Textiles	271710812140
323	HandyCraft	634418222154882
324	GAELOOFER	634418218805797
325	HEAVEN HOME SUPPLY	634418221903485
326	BlissfulNestShop	634418219086953
327	FabThread	634418222149773
328	TapestryTrove	634418222257296
329	Teen Trend Threads	634418219877728
330	Core Stitches	634418223058098
331	Wildlife Wonders	634418222390205
332	Snug Havens	634418223044782
333	Warm Blooms	634418222968050
334	HeLing DaMai	634418218033991
335	LoomRoots	634418221601817
336	CosyNest Blankets	634418219637694
337	Jning DIY	634418223030324
338	Wurun TWO	634418223251818