

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

ALONA SAVCHUK,

Plaintiff,

v.

MEISHILAN, et. al.,

Defendants.











Case No. 26-cv-

**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 2-444-344	Valentine's day with rainbows and hearts		
VA 2-444-345	Black and white doodle dogs		
VA 2-444-339	Modern cats with wild animals skin texture		
VA 2-444-341	Ribbon bows with leopard, giraffe, tiger, zebra textures		
VA 2-444-350	Childish pattern with colorful dogs		





Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-444-343	Funny doodle dogs		
VA 2-444-335	Evil Eyes		
VA 2-444-346	Modern snakes & Floral set		
VA 2-444-340	Celestial mermaids. Zodiac & whale		

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-444-338	Chicken collection		
VA 2-452-317	Christmas pattern with funny dog		
VA 2-443-465	Funny dog and cute cat best friends		
VA 2-444-351	Christmas illustration of cute cats and funny dogs		
VA 2-444-348	Valentine gnomes in white background		

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-444-336	French bulldog		
VA 2-444-347	LGBTQ Pattern		
VA 2-443-396	Pattern with hand-drawn turtle		

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-452-327	Grunge Turkish evil eyes		
VA 2-449-714	Magical unicorns		
VA 2-452-325	Christmas gnomes on a grey background		
VA 2-452-319	Halloween pattern		

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-452-323	Childish pattern with cute dalmatians		 <p><small>Click to see full view</small></p>
VA 4-452-315	Modern snakes & Floral set II		
VA 2-452-321	Childish pattern with roads & houses		
VA 2-443-466	Funny dog and cute cat best friends II		

Reg. Number	Title of Work	Copyrighted Work	Defendants' Image
VA 2-444-337	Pets in berets, vests, and scarves		
VA 2-443-395	Zebra and leopard skin		

**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.

3. 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.

4. 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.

5. 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.

6. 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.

7. 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.

8. 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.

9. 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.

10. 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**

11. Plaintiff, Alona Savchuk, 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 Alona Savchuk who is a newer artist with a passion for surface pattern design. Alona Savchuk derives significant profits from the sale and distribution of art prints and licensed products.

12. 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.

13. Plaintiff is the owner of United States Copyright Registration Nos. VA 2-444-344, VA 2-444-345, VA 2-444-339, VA 2-444-341, VA 2-444-350, VA 2-444-343, VA 2-444-335, VA 2-444-346, VA 2-444-340, VA 2-444-338, VA 2-452-317, VA 2-443-465, VA 2-444-351, VA 2-444-348, VA 2-444-336, VA 2-444-347, VA 2-443-396, VA 2-452-327, VA 2-449-714, VA 2-452-325, VA 2-452-319, VA 2-452-323, VA 4-452-315, VA 2-452-321, VA 2-443-466, VA 2-444-337, and VA 2-443-395 (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.

14. 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.

15. 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.

16. 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.

17. 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**.

18. 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.

19. 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.

20. 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).

21. 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

22. Plaintiff, Alona Savchuk, is the owner of the Copyright Registrations that protect the Plaintiff's Works.

23. Alona is an illustrator whose works combine delicate and thoughtful design with vibrant storytelling. She often draws animals, nature, and human connections. Her illustrations carry warmth and nostalgia which is inspired by her childhood memories of growing up in the countryside. She also gathers inspiration from social movements including abortion bans, LGBT rights, and the coronavirus.

24. 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.

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

26. 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.

27. 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.

28. 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.shutterstock.com/ru/g/Alona+Savchuk?rid=3437270>. Plaintiff's own website. 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.

29. 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**

30. 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.

31. 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.

32. 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**

33. 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.

34. 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.

35. 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.

36. 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.

37. 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.

38. 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.

39. 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.

40. 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.

41. 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.

42. 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**

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

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

45. 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**).

46. 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.).

47. 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.

48. 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.

49. 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**

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

51. 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.

52. 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.

53. 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.

54. 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.

55. 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: January 30, 2026

/s/ Stanley D. Ference III

Stanley D. Ference III

Pa. ID No. 59899

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409 Broad Street

Pittsburgh, Pennsylvania 15143

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(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**

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
1	meishilan	AVVL40M74QBJO
2	hualanzhi	A2Q878GZIF0BOJ
3	TingFontin	A2EA17YYIBSDT8
4	LONFENG	A1CPTI1DN5HGF3
5	AmoyStreet	A3EYNG2S4U6DXU
6	DALAWU	ASEON902W2POZ
7	BathStation	A19YB2HC11GKZT
8	putianshichengxiangquguozhihaomaoyiyouxiangong si	AWH44X631YDSX
9	chenrongjiaju	A1OS5PRU33E269
10	MAYIJON	A28BMRTWVDYPJ
11	USHALOKITTY	A1OW1YHKLNQZH U
12	USORCHARD	A3UNOL8SSTNV2O
13	Izzo Stors	A19WS71KAIGW1N
14	TOLOHETO	A3E6034VADCSGK
15	XMCJQ	A2J4PQFMKOKGM8
16	LMLFT	ARTGX9QU48G4O
17	CHISHON	A3AI69UB3E47ZG
18	JUMBEAR	AZDR20VABOITV
19	JOEBAIYA	A3G2AUMQX41F4A
20	SCECALA Direct Store	A2RS9EZYJL08TP
21	FuJinHui1998	A35U4ZQZFHSLGO
22	YETTASBIN	A1PSPKJPK0MAM0
23	siyxyb	A2XA02JOCSR02F
24	SEHANY	A2OCPNSV00Y4WS
25	OREZI	AF3SYPWSXVL10
26	ZHIHUISM	A39P5KA0444XBV
27	QINGDAOHUIYUSHANGMAOYOUXIANGONG SI2	A26KYVB3A7R1H4
28	YEGAME	A1D9VM5BNVTLO4
29	DIYSTYLE	A1OVN642X5YWBA
30	LifeCustomize	A1AYY4VW577VB7
31	mingbin's shop	A1KFEVB24EHUZ5
32	Dream Bay	A10O8J09DIUEMY
33	Moudou	A38KRXZF9P12PX
34	jinrushuang	A3MNGC39E6ELKK

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
35	Takiito	A23BOBTR4FT690
36	Moudeng	A69IK32ZE4IJ4
37	Plaace	A9FU0EZJCEVIB
38	WHBAG	ASMVIWNF6G5VD
39	Lancerry	A1W248TLDDNC9J
40	ZhoLing	A1I6MUZ1I658DH
41	FJDENG	A2S3OIAHYVXANQ
42	wuchungenmaoyi	A2ZRIIMW8NBE7K
43	hubeimingzhishangmaoyouxiangongsi	A15M5RAWC4AM6 X
44	qiuxuhuyang	A38XQWRK125SN4
45	wenxinchenyu	A2JX3XFZ0NYQ26
46	ABADANEE	A2UE0XS05MS2IN
47	Blueangle	A38UXBYR59P10B
48	KEEPREAL	A1TR2J0A9AEHA8
49	CCZ Home	A26FJ7ODD9F0O5
50	AIFAAFIIA	A3L8VCFI7CMU8H
51	Facaiy	A3UVZ23B0M4285
52	yearnyear	A163S7S1O7E15L
53	ATTX	A2IZFX23I4HIU2
54	Caojimajia-shop	A2BDYH5L9G3NYV
55	haikoumeilancancanya	A1KWIHCP0PNNWT
56	stormly	AV9KD1JU7NPW6
57	Pujiang Wenxin Home Textile Co., Ltd	A246EOB50IHDV6
58	GuangZhouFuQiMaoYi	A33Y6D3FIXBR3U
59	ALYDFFY	A10HCMCPW5QEM1
60	KKailii	A2OJDMYASHFCJV
61	HiLus	A119LY5JLZH6YK
62	Hanihan	A3BVZR5V3LS1MJ
63	SuiZhouShiZengDuQuXuYuYuan	A3VG729FS84J4H
64	shen yang shi shen he qu gao guan bai huo mao yi d	A1OUYKXCC9YL1O
65	fanxiangjiangbeimei	A2LEBU6307ULSA
66	huce-shop	A3LYUJUGJ4I58U
67	lxooo	AXWZGT815E69C
68	ECOBAS-US	A25FESCNDJGYAK
69	huojiaxiantongjilucaopengmeifadian	A3RJUQITV3U272
70	Kaltoon	A318F0XTA38ZI1
71	dhgoume	A31448L3RRYNAE
72	jinwenjiuhang	A9Q075GR6UXS4

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
73	zhuwangki	A2LOZNOO98GVQ1
74	Yappi	A2TLEINSP2GWAC
75	Lin Jian Bin	AU49LR7SM283P
76	aBu	A1GYIL2QQ4WP7Z
77	Hutou Junzhi Clothing Store, Xiuyu District, Putian City	A384IDOHIBWY6
78	XINHAICAIYANG	A7A0UE9YR58C4
79	PYBUG	A2E45MA96BHUBE
80	OneBear	A1ARU0MRJ5M0RJ
81	KJIZMO	A60AARLO310AM
82	AGONA	A277OFVFMWU8BD
83	Guitong	A1X52S2H6W733
84	Yisharuier	A3M5EZ7R3B6A8A
85	gxcgaocing	AXUW3B24ZHOYV
86	DoMouse	A1UNIY43O3XRWF
87	ingbags	A2NEVJFH7Z94OB
88	FUGIDOG	A10GVA0P041DF9
89	Oplp	A3FHPT0209PWPM
90	HUANGXIJIANG	A3IJUGAC464SCN
91	XUANYISHANGMAO01	A2W51FRQGJV5UT
92	KAI YIN Shop	AFB06U70UB5QR
93	HOIUPLMKIJ	A3NKR0WKKL0C1L
94	Yangdananshangmao	A3UWC175BU2P7I
95	TcIFE Fashion	A14G84LT4QIDV9
96	SIOKLIO	A29I5GWNB5PJ7L
97	YNIQUE Direct	APLI69XGHF1I7
98	AILLOSA APPAREL	A3MK1GWL21KGI3
99	JBYFFLY	ACHXVZ8GAFMPD
100	Winchihan	A1X8ESNK8KJ803
101	ggversacxv	A20G2POUB5VFG4
102	Yuihome	A3PPDUPEA28JRC
103	SUABO	A1C6488OX78Y3G
104	YNNALE	A3V3I38C70QJPP
105	velumair	A1XWE8V773PEPR
106	ihshop	A2PUR4TZ59ECG1
107	DIGTIA	A2CLQZ740MA5PG
108	LMBZALWA	A1NNLBC4FGOYQ9
109	Sletend	A1YMHNI860JLUC
110	WANGSHUAI01	A31W7C0UZ4A414

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
111	JIU YOU JIA JU	A3R0QJ25A1D4ZS
112	RUCPGDN	A3DVHR4RIXCSZX
113	LIGMALO	ALMYZR1BQI05H
114	FloraNestLiving	A3SGSGS4M6V41V
115	kikyolium	A23BH5JWS8G9TK
116	Kunsgar Decoration	A2VEDY2IXFXHHA
117	meiyazhen	A307MZQS4464AX
118	Gugusary-V	A1L7S2I92YEZTP
119	zhihuazheng	A3IQJKLFD4AU8I
120	MeArtisticGift	A3V7WRGXOLLRZ1
121	VKPSCHJ	A3P4YKF1LGFY33
122	Li Ming Jue	A2NIKTN2006L5M
123	yoyoto	A1QWVETOL3E65
124	Ruspepa®	A14YM892528UG
125	Mektron	A1T6X8MHAIZ5A5
126	oline small	A9OXU31ZDRX3D
127	YAODINGHUI	A162CR8K5M1P69
128	yao peng3	A36PWFKRXVTUU5
129	HUAYIDIANZI	A3Q38OGCDB7FC4
130	Beauty is a wonderful thing in the world	A1MS8GT94N76M0
131	Pevtufa	AHG9PNPM7WPF1
132	WOKITEI	A3VVU56Q9URM81
133	Djaby	A35X9TO48N1674
134	WZWUS	A1F4L9L1KEPLNR
135	Cranranshengqi	AYQ49BPZPSOQA
136	CHENLAN	A3NINONFLWV2WI
137	LumaFynLight	A3IGNMTWZVP2XD
138	EUSOLP	A2OCHCVJWKQR48
139	ChaHu	A1EPEGWT1ET063
140	URKFL	A2XRZL0NLHFDWD
141	XisoVer	A3MDNGJGPF7QAM
142	Mengyuanke	A1NVO7WTD3ZTMT
143	YcLenYo	AD6WAGBTOHEN4
144	XiuHu	A31I9BF91VAU8P
145	Jiahon	A2GHCM3MITDKU Y
146	Lioker	A11EN935X1J9RW
147	hlgff	A26P9PCUL81BTC
148	GKM-GLOBAL	A15CD7CH9P4R4I

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
149	jmcsy	A3CP7MEBPZ3BEX
150	USA Essentials Store	A115B0U2DREM2T
151	Xmyws	A14AVY2ROJ3QVJ
152	Pingze Design	A4KWIN6L0XMUU
153	hgc996	A2OYXQRZH22FMR
154	SSBHLE	A7CAXOLASIG93
155	HomeDecorate	A2UEWVC9AMHOF N
156	zhihuzeng	A21SEZJEB56VUQ
157	Hong ming he	A1JXC58YAC5MZJ
158	Sanhe IOT Company	A1FKK7C5NGQ004
159	shanxiruizeshengjianzhugongchengyouxiangongsi	A2OEOA0MS4YHD
160	YiWuShiYiLiangMaoYiYouXianGongSi	A17HGONTZBZO6A
161	guangzhouyoulishengwenhuayouxianzerengongsi	A1QAGP11F3L1O7
162	wenxixianruihuichaoshiyouxiangongsi	AEZ04DIQ9U5ER
163	guoqing Chen	AZYM89AWJEKE1
164	QinHuangDaoWangHeDianZiKeJiYouXianGongSi	A1CISOEYXCEKKA
165	gansuhaochezhiqiaqicheweixiufuwuyouxiangongsi	AIQ4XNVTTV93W
166	ndxgpu	A18INDLVBEI4UI
167	Cozybedket Direct	A3CU2G1Y64LTK6
168	wangfenduo123	AOYFQQZZ7FT54
169	yangyanlei123	A29QGKIFSSY2VQ
170	Anydia	A2GCC1BMZMP04T
171	Dalzium	AXP4DH0WOH70I
172	LoiFa	A3LEURN09TP1XV
173	Chen heng feng	AL6Z15QF009RY
174	Lijuanjuan-1	A2D9KNHDCQBND0
175	lichengzhi2023	A3J2PNVV00U9CB
176	hongchaodong	AEYNOUZG82GDL
177	USCHIFIYU	A2HBJYX8D94Y3L
178	DINGSHENGXINRUI	AORWVR4OZKZNH
179	hongtao-1	A33O1DC76V6LY8
180	SHENGLIANGTUO	A1XWE4ZW7QSX0C
181	QeLen	A212ZABY57KN2H
182	ShoPen	A26WY76VQNYVRC
183	Sacozy Home	A2BTX9V5C2FNB1
184	HONLERLY Decor	A2LHGDQQU0W942
185	XYDE	A1U3QBOP2G5IWV
186	QIDIA	AA4AMHS7Z27A8

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
187	MAOBLYR	A2W7TTOEXMMS3R
188	GOODOLD	A10KD9XS5G7KAF
189	Fakifak	A3MKGD5DJ9CLHY
190	SDMKA	A227VDMPOEWCHL
191	Burbuja	A1W7T0WSERS4X0
192	WBDYJD	A1GL02S85LVL2Z
193	Hryg	A1GC1WEDVK6FB6
194	Jinrui-us	AKJ3BTS0DRJ4
195	Fuchen	A1V1AD6BKDPO8U
196	Vosery	A12C06AY1IH91X
197	BinTu	A38ELF50NJPX03
198	Mosytuky	A1TEST1NMW15WH
199	BZH-US	A2AQKZ7F81Q3TE
200	YUEYING-US	A2O9BGM4L3GLP4
201	SA-Toy	A3DLNQTG66U2IT
202	DOREALA DirectUS	A1M1YFDQH816LY
203	guangxinanninghaonuodianzishangwufuwuyouxiangongsi	A2KCJYU5CFH9XK
204	suixianjiyuanbaihuolingshoushanghanggetigongshangh	A1DZPGLSY2DGVW
205	foixnub	A1B6DKN0OX1VZQ
206	SLHKPNS	A3NJ4GHFCJGE7Q
207	CUPADA	ACV9V5ZNL0G8D
208	VIGTRO	AZ0LA67RZRDBX
209	Rainnielove	A3LQ9LJ1UUR1H
210	mzbusiness	A1GTYZL9GSFUOS
211	putianshichengxiangqutingyuxinbaihuoshanghang	A31BPNQANP4E51
212	wanzaixianzhaoyangfeibaihuodian	AEGSSSE1MFWZI
213	VunKo	A33GSTJ5PEOXZF
214	YQJS	A3VG4Z3AQIGUQB
215	zhongji	A1FW2GHMXNB2VI
216	AJLUCK	A1634L66UC8CUY
217	zhimidianzi	A30NO2VQH5782E
218	QQMARKET	AJW65Y1OF5U1E
219	GEFANG	A3VMV5J71BSK80
220	Qiesit	A2716RV4QXEFTD
221	krisa	A3IZW9K2JE8PSN
222	SheKin	A4DPKNVX3AU57
223	YUIBOO	A2A35K7V1XWJWV

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
224	chongqingjingyuejiancaixiaoshoujingyingbu	A2ZY4V8OF3GOJB
225	VIKKO	A10JWCN9KNNMJ3
226	My-Door	ANQEGSBDK5TOS
227	My Little Nest	AYM8YSERI3EL
228	KwikMedia	A1AYRLEMJ4BHS
229	Domeca Collection	A1TPZBOMJ4J2KE
230	Jueeco	A1C26MJ3Y27BMA
231	caiyougongmei	A3MGI13XRXWO5I
232	XiangLuanChuanXianBaiH	A3Q4TRI8GAB5HU
233	yayaa	A2KMOB7VKQH3JX
234	FORMRS	A40BIXMJXOMGA
235	Skycess	A1GK5V6D4LRET1
236	PLAO	A23CT62UYUD7S
237	Caikeny	ARAGOEJK9K3N9
238	HonDe	A1T50V22FS0958
239	wangxingkj	A31ZHLQBFHK007
240	Shian Ti	A2NB1I7XF9VYBO
241	MineCustomize	A3CVY29W675PIU
242	Leejoan	A123J1NHVWAIUG
243	LanKen	A3RU86RBWBTTTY
244	Beok	A1SQHSO53SSFBU
245	W6Design	AQNK4B02ONWZZ
246	Oicvrct	A2VWNZKNE8CFK6
247	WHOTYH	A1K5GSDBWO45ZD
248	Bay White E	A3A6YL2QWP8HZW
249	Elpwezua	A3T6BGFVHB6VXQ
250	U-wear	A12MABQ6F1RVHK
251	RuiSenSuJiaoZhiPin	AW9F0XXPDC4DZ
252	FunHomie	A1RZJ8P86UO5QK
253	Sugar Life HDecor	A8Q4PSV0IE40A
254	MOYYO	A36UDPHXU8B6VP
255	AFHYZY	AZMMMXP24E6P
256	KOCOART	A3UMQ0Y5RARC0U
257	DIYHOT	ADJFUT83IIDD2
258	Avalokitesvara Direct	A2L6JAYL7ZY31D
259	POUKE	A15Q3CPYL8AXCM
260	Wusikd	A2XA8SYYE76ISX
261	Fstudio	A277IXEHNEN6OX
262	ZZHW	A3FCLQMVIIYM6AQ

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
263	familycozy	A3GZ9PCXWKQ2QU
264	SKYDA	A1KITK4A5218C8
265	gdxxly Shopping	A26GKABYNVJF9Z
266	Tinnlum	A19FKIHRW0SO97
267	MYING	A12IDPDDN10ZL6
268	Lhammer	AY795FDLQ0V3T
269	Yuxiz	A1J60P49UUDIPL
270	Coikll	A1JK6ZHJCFM99V
271	AGYTBG-Store	A2PGMI502H260G
272	ChuanBi-Store	A15SAY4QF95O8N
273	chenga-shop	A1AEWWXCH9FXY H
274	PuYangYouZhuoWangLuoKeJiYouXianGongSi	AWUEDF16VR01T
275	Huryilo	A38P9FDKKIF4OU
276	MoBlinko	A3UQ6VYUXOD799
277	Vozozza	A1JHMW6287ZGO7
278	LINMEIZHEN	A19G9HAHX4FICJ
279	FireEC	A2VFFBXGL3ARQX
280	MXGFT	A2ISC71UXADRZE
281	Plain water trade	101616046
282	CoffeeMat Company	101629837
283	LiangQianHe	101664421
284	zhanweisen	101645461
285	Lumnis Lamps	101349623
286	Yip King Trading Co., Ltd.	101692171
287	FSJXNDZSWYXGS	101555050
288	haibinglanmaoyi	102509211
289	Leyu-US	102518302
290	Yiwu Lixin Trading Co., Ltd.	102518258
291	Yiwu Zhuoling Device Co., Ltd.	102518498
292	Yiwu Ruifan Trading Co., Ltd.	102518457
293	Yiwu Taoshi Trading Co., Ltd.	102518342
294	JinruiMY	102515147
295	Juoritu	101693197
296	DouZhe	101253752
297	TEQUAN	101293866
298	Teen Trend Threads	634418219877728
299	GiftsByDesign	634418218767145
300	HLJP K	634418218430035

<b>Defendant Number</b>	<b>Store/Seller Name</b>	<b>Seller ID</b>
301	JPHH	634418217880894
302	JPPTsunning	634418214810601
303	YOUYIZOOM	634418223603786
304	ZOMSOCAL	634418223858751
305	VerveCup	634418220962611
306	Friendly cup local	634418221409370
307	llzzong Cup	634418221077886
308	Milky Way Worm	634418222378556
309	Petal Parade	634418222154666
310	sssfpp	634418223443570
311	FeiXu Gifts	634418216896691
312	Meetbrand Nine	634418223248111
313	CLannad cup	634418221787563
314	Q Yuan local	634418221451083
315	Fish cup Shop	634418221791530
316	JPPZguizhou	634418221561791
317	Blanketopias	634418223589909
318	FabTailor	634418219318247
319	MadeForU	634418219318186
320	Comfortable and warm home	634418218935664
321	Attire Mirage	634418218241470
322	Kailin Studio local	634418216146621
323	Refining explosive	634418221194131
324	Shiver navigation	634418220929412
325	HNXBYH	634418220306641
326	Dinora local	634418215477066
327	UrbanWea	634418223301256
328	Voyageie	634418223300729
329	KNLNLN	634418218488558
330	Boutique PortersAA	634418223265947
331	GZVGZV	634418218899320
332	Cozy Mat House	634418217955965
333	Artslab	634418217308656
334	DesignDuds	634418219010446
335	Home Furnishings CC	634418211776461
336	CZJCJS	634418221080338
337	Invincible Zhu Yu	634418224029200
338	Shuangshuang fabric shop	634418217872721