

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

FAENKOVA ELENA VALENTINOVNA,

Plaintiff,

v.

YOYOTO, et. al.,

Defendants.

Case No. 25-cv-1854

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	Example of Defendants' Image
VA 2-454-242	Tropical exotic bird, leaves and flowers		
VA 2-454-245	Cute dinosaurs watercolor seamless pattern		
VA 2-454-803	Cats seamless pattern for textile		
VA 2-454-786	Cute dog seamless pattern		
VA 2-454-241	Valentine day. Watercolor illustration for card with a cute penguin and red heart		

Reg. Number	Title of Work	Copyrighted Work	Example of Defendants' Image
VA 2-454-146	Cute bunny seamless pattern. Rabbit watercolor illustration. Wild animal. Herbal background. Decorative botanical flower, plant, herb and leaves ornament		
VA 2-454-799	Cute bunny seamless pattern		
VA 2-454-795	Cow watercolor illustration. Farm animals.		
VA 2-453-679	Canary bird watercolor illustration		
VA 2-454-681	Emperor penguin seamless pattern II		

Reg. Number	Title of Work	Copyrighted Work	Example of Defendants' Image
VA 2-454-680	Emperor penguin seamless pattern		
VA 2-454-747	Fox watercolor illustration. Mothers day card		
VA 2-454-247	Cute cats seamless pattern		
VA 2-454-797	Cute giraffe. Watercolor illustration. African animals. Exotic nature. Wildlife.		
VA 2-454-633	Cute little forest animals seamless pattern. Watercolor wild nature illustration. Animal print. Raccoon. Fox. Bunny. Deer. Hodgehog.		

Reg. Number	Title of Work	Copyrighted Work	Example of Defendants' Image
VA 2-454-778	Cartoon insects seamless pattern		
VA 2-454-236	Christmas seamless pattern with deer. Watercolor winter holidays decorative elements.		
VA 2-454-635	Cute penguin. Watercolor illustration. Arctic animals. Wildlife. Polar nature.		
VA 2-454-754	Funny zebra		
VA 2-454-758	Rainbow Zebra		

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, being willing to accept an order for a product bearing Plaintiff's copyrighted designs from a representative of Plaintiff with a Pennsylvania address, being willing to ship the product to that representative in Pennsylvania, and being willing to collecting Pennsylvania sales tax. In addition, upon information and belief, each Defendant has sold 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, accepting orders from Pennsylvania residents, shipping infringing products into Pennsylvania, and collecting 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, Faenkova Elena Valentinovna, 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 Faenkova Elena Valentinovna, a skilled artist who has been honing her craft since 2001. Her career started by illustrating children's books, a field that remains central to her artistic inspiration. Faenkova Elena Valentinovna 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 2-454-242, VA 2-454-245, VA 2-454-803, VA 2-454-786, VA 2-454-241, VA 2-454-146, VA 2-454-799, VA 2-454-795, VA 2-453-679, VA 2-454-681, VA 2-454-680, VA 2-454-747, VA 2-454-247, VA 2-454-797, VA 2-454-633, VA 2-454-778, VA 2-454-236, VA 2-454-635, VA 2-454-754, and VA 2-454-758 (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, Faenkova Elena Valentinovna, is the owner of the Copyright Registrations that protect the Plaintiff's Works.

23. Faenkova Elena Valentinovna is a skilled artist who has been honing her craft since 2001. She graduated from the Belarusian State Academy of Arts, following a rigorous artistic journey that began at the age of 10. She then continued my studies at the College of Arts for five years before completing her formal education at the Academy. Her career started by illustrating children's books, a field that remains central to her artistic inspiration.

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/g/Dobrynina+Elena?sort=popular>. 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: December 1, 2025

/s/ Stanley D. Ference III

Stanley D. Ference III

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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	yoyoto	A1QWVETOL3E65
2	DNSHENG	A1OYZMPHZYOR95
3	nanyangshiyulianshangmaoyouxiangongsi	A2ARVCVFN0KWLZ
4	BOB Baby	AZM2ANUS2BJD3
5	mimihome	A3SPDIRUXR5G5H
6	henanshengkujianzhuzhuangshi	A11TKPALMVGPRC
7	seulife	A3MZRQ6D2PXR85
8	Bemailbox	A1LZ7HEAJ021QQ
9	TLSMCHENYUZHENGZ	A11YY2GRH0L8FJ
10	FIYY	A2425W3HIX605P
11	Custom Bed USA	A1R4L4X6SMJBLR
12	wanjingying	A2SEWGNNGVLP6G
13	CHENGSHIYI	A2LV29SOAUE5YY
14	shenglixing	A1KEV1ANFALKNF
15	NovoLunmen33	AO33A201AAMB1
16	Kurtect	A2TRAFJ0NF50RU
17	Chocolatemaoutdash	A299WXC8IWGCAB
18	YAODINGHUI	A162CR8K5M1P69
19	HUAYIDIANZI	A3Q38OGCDB7FC4
20	shangshuaijie	A2QHBFB2CQQH1H
21	KANEPE	A2IAP1XHHWEYB0
22	DDCBNS Store	A2GHUNIL3P8XWR
23	LuckyBetty	A27HWYLLVL7VCO
24	Moonlit Path Home Decor	AAKT1Z7AB58RL
25	zhenliemao (Support customized personalized)	A25CGW8WXA0BK
26	ETJOY	A6KE6BD3APCZP
27	MoslionDirect	AZ0H52ROK2RYH
28	Jibaocheng USA	A1CC0PYZE811OZ
29	duanxp1513	APQYT7E3XOA1Z
30	guangzhouzhengchangshenshangmaoyouxiangongsi	AHXWY812B5DCZ
31	EMXION	A2HUV7LM64HU2G
32	YESPOAK	A3TYSIUH0T31HW
33	NingXiStore	A1NV0FCTI3C6HG
34	CIAIDUHOME	AB66TMTV94IDP
35	SHOPPING 4U	A30D821X19QB5M
36	zhoujiahongbaihuodian	A1QAT8G6CFFXT7

Defendant Number	Store/Seller Name	Seller ID
37	Zengzhifengbaihuojingying	A2KW6ENEALJW6X
38	Parachuter	ARWYW9HWYTUGS
39	Jmjhy	A22O01RAM0E7P1
40	Lanyubaihuoshanghang	A1E6M701R20QNZ
41	ZHLJ1992-ING	AE4KEGB8I7NPS
42	Yuihome	A3PPDUPEA28JRC
43	LICHENGYATUOFUSHI	A32PSYZ4YCDR81
44	ALAZA	A8VWBNWPDDEUU
45	AxxitudeUS	APKIO2S1YLK66
46	CENXINL	ALYEQ7PP4PEPR
47	MINGWENGLAN	A2FGKLQYAJXWRF
48	Cikinmi	A2806QVM3PQQ11
49	ningbokuwoshangmaoyouxiangongsi	AKVDNMIJRN4M
50	British Interest	A2148EX0Q721CP
51	Decaistore	A27EYB1650N1C0
52	Fopica Laundry Bag	A3J3LGVT9KL0AU
53	xmf	A2MALLW6F9KN03
54	larkverkar	A2WZBVK2XX3C7Q
55	wanzaixianboxindubaihuodian	A14CVA7YVY93R4
56	wanzaixianlianyabaihuodian	A3QLU6I8UMZJ1W
57	putianshichengxiangquzhazhehaomaoyiyouxiangongsi	AKN4CPLLH0RD5
58	suizhoushizengduqucongjianglongjiajuhang	A3T1ZPIO9II838
59	CHENGXIANGXIZHOUWANGLUO	AHOHUFWNXZ7QC
60	Rainnielove	A3LQ9LJ1UUR1H
61	luohuimukaifushi	A85QYTGH2TEUJ
62	WHOET MOOE	AXKX2WABNXJFJ
63	erosebridal	A1DYWTHAQ0V0XG
64	ELTSKT	A3D84K3J5GW65R
65	jikonghuifu	A2MOE8OWUBQYU9
66	JanJCurt	A2PK3L7329C3J5
67	guizhoujiechan	A2XIPVH0H1XQR4
68	zhoukouluanxinbaihuoyouxiangongsi	APH2HMO69W8DM
69	Xingyaodi auto parts	A26QFH0Y85XGFD
70	guangzhouchangxiang	A18Q64SDLIQYUA
71	JUAMA	A3I91KRLBA4K9U
72	KOCOART	A3UMQ0Y5RARC0U
73	nanyangshilongquanshangmaoyouxiangongsi	A2NPA5MOOU0A7Y

Defendant Number	Store/Seller Name	Seller ID
74	QIANDODUO	A3B8VP96P8ALBZ
75	jiningyoumijiashangmaoyouxiangongsi	AO1IXSTQFWMZK
76	Yongxin Leqi	A38P32HNR2WOOX
77	shenzhenfengyushangmao	A1AYNAJUUY9EE
78	永旭货物进出口	A1ZKNT1MOB6HTT
79	Huede	A2J2ERI108URT5
80	ShanNiKeJi	A3O65I3SWATSYQ
81	JNX store	AUQWFA7G7PQZE
82	ChliEarime Heicatte	A15B8DKLERSY00
83	CVHOUSE Bedding	A2CBY9BXGOA243
84	COSUSKET BLANKET	A3N5KR1VMZKABE
85	Guangzhouyufeishangmaoyouxiangongsi	ARTKB7UFI05M3
86	PALETTE SUPPLY	A1UCJSE9W3S0N6
87	VunKo	A33GSTJ5PEOXZF
88	DDDchenkeqiang	A3L0R2SNN131AV
89	BaiShunNongJi	A2DV6XUEN8001E
90	YETTASBIN	A1PSPKJPK0MAM0
91	putianshibianhongmaoyiyouxiangongsi	A43TNKRJRFELQ
92	zanlin	A2TALNQINX2WBI
93	ngFengGuShan	A2O5EW6HTTISCT
94	nanjingbaolandewenhuachuanmeiyouxiangongsi	A3NA83P1WXZ1QB
95	Nanolii	A1IBEKZIU11PWX
96	ChenJinXiangkhjiohjb	A31BPNQANP4E51
97	Laskairoc	A3Q4O7PHRL3ZWG
98	Ailietra	A397KM8XILD2ML
99	Lurafexi	A243CKTCEU8W4P
100	zuotaihangwww	A1SYKKO6M7O5UD
101	putianjuquanmaoyi	AN4XHVRFF5KJ8
102	Tropicova	A36P6JSNJ6AVFG
103	MSBHH	AW2LIXTOT6OCJ
104	AMCBESS	A2GUJA1TEVF7HT
105	CoolXian	A14TBU3OBLEQ7V
106	NKIYUJK	A2S5CGD5DYUOAT
107	HOIUPLMKIJ	A3NKR0WKKL0C1L
108	WHOTYH	A1K5GSDBWO45ZD
109	U335liyuanrong666	A1WPX96S30VJ0W
110	CLS-GLOBAL	AHBVLOQHSJMD4
111	YANGJIJUN05	A2RQ610Y6GQBK8
112	Hersing	AZRUVX1BWY7R

Defendant Number	Store/Seller Name	Seller ID
113	SSBHLE	A7CAXOLASIG93
114	HappyGold	A2MZCFP0LLG03I
115	Xmyxyy	AKQATOAJV8OKH
116	SANGTEN	A1J1NMFWAD95X6
117	liying1211	AB0WW9OPYI5ER
118	SDAQcaoyuzhou	A2NA43AVPHNJ8F
119	SLHKPNS	A3NJ4GHFCJGE7Q
120	W6Design	AQNK4B02ONWZZ
121	SOUL211	A257T7L4JG6PS2
122	Namoxpa	AW3AWQW7JT0X0
123	meiyazhen	A307MZQS4464AX
124	EASOON	A2V4V561UVF58C
125	SXboxing	A6ARCP083YW8J
126	happywindman	A3O1R1CVVSSZJN
127	BTUA	A2DA7A57O8WNX0
128	PENTEESHOP	A3J2JNAJIQA7MK
129	WonBIG	A1ARYOJV21H6HA
130	Lancerry	A1W248TLDDNC9J
131	ARTMULU	A3Q277NSQ0KEZG
132	Msauto	AKFH36999QIO5
133	Tajemtn	AM7Z98A734NQY
134	HofensDirect	A3J6RAM3I9T2I
135	DaHoCo	A3UOX7UHC2YMYI
136	vvqstore	A2HE5Y34TADRQD
137	ptastorez	A2ZNCTWPQMOUU A
138	DAIFEINI	A3MKEHI41X811T
139	Cenluxy	A30EA4Z6F412R1
140	HeNanMiLuoMenChuang	A3J4TL4W8AOVQN
141	Hua Tuan Minh	A1W005PWNG566Z
142	wulishfashfuasfs	A3IJZTR96B2RK4
143	saunx	AKJ137KWCYT4G
144	gyanlu	AYJBYPLHPI2FX
145	kuiqing	AL75F2DP12GGV
146	Xintay	A3LIQ9ECJ9YD2J
147	Guangzhoufuxiashangmaoyouxiangongsi	AJQ779GA8WTN2
148	CUTEBAGS-US	A3PXJQRPJQUV01
149	dongboxinnengyuan	A2TAT99T6VPAEA
150	Shekkmsa	A304RMLE3VVZM0

Defendant Number	Store/Seller Name	Seller ID
151	zhengzhongfa01	A1T7IOCJCU8QCN
152	xiangyangshiyouyuxiushangmaoyouxiangongsi	A3RMM02LOIVR5X
153	镜子饰华贸易店	A3K7ZXDW4GV7LO
154	jisnerg	A1WBPLJQFU8XRC
155	panlongqusichaobaihuoshanghang	A2ZJTPAP9HYGMJ
156	chongqingjingyuejiancaixiaoshoujingyingbu	A2ZY4V8OF3GOJB
157	海冯边玩具	A1MLA6MCC0672V
158	FYZIUS	AJGQ9I5ORJ8MT
159	GH-GSY	A2P111893206WP
160	XiangLuanChuanXianBaiH	A3Q4TRI8GAB5HU
161	Blueangle	A38UXBYR59P10B
162	LiRenHui31	A3SR578DGRKMZZ
163	putianshilichengqupingyafuzhuangdian	A2XWZT57L7EB2F
164	Vozoz	A1JHMW6287ZGO7
165	Deal-Love	A27CUX4RR4YR7G
166	putianchengxiangquchaiqinfengbaihuoshanghang	A2T8GT3CZ907WK
167	leryfswbd	A3VJTG8BQ73SBF
168	Groundsunset	A34ANTWSI4P1ZK
169	velumair	A1XWE8V773PEPR
170	susiyo	A1KU7HH44RORR6
171	Even's shop	A2ZBJXO2O99APG
172	Dunyuanlan DECOR	A3WR3HVS29YLB
173	Tuole LTD	A3PWBOFIAC2328
174	MaiTuo	A25UR8A6JDUAL
175	GeazoyDirect	A2HLKPMAP07LRW
176	Lida Store	A18Z7HJFJTR3RM
177	BMuANIME	A3BOTAICQRFYFX
178	YETOONE	A1EEQYOOELFKEI
179	wangbaoquan5566	A107IQN1PVN0VG
180	zhangzhoushinuoyumaoyiyouxiangongsi	A1ADACMB4WUX9 D
181	stasup	A2G6CZKTSD9KU0
182	angleoo	A6AQFTU9130ME
183	RunGoo	A1I4V8LH2J3HTB
184	KHGBT STORE	A391670KRM1KV8
185	longxiang0801	A2WMM5Y1KYB69R
186	JYJEYORA	A2YKMIYBV5RRW7
187	ChaHu	A1EPEGWT1ET063
188	WOKITEI	A3VVU56Q9URM81

Defendant Number	Store/Seller Name	Seller ID
189	Pevtufa	AHG9PNPM7WPFI
190	Jinrui-us	AKJ3BTS0DRJ4
191	Cranranshengqi	AYQ49BPZPSOQA
192	YUEYING-US	A2O9BGM4L3GLP4
193	EUSOLP	A2OCHCVJWKQR48
194	CHENLAN	A3NINONFLWV2WI
195	Jiahon	A2GHCM3MITDKUY
196	XiuHu	A31I9BF91VAU8P
197	URKFL	A2XRZL0NLHFDWD
198	XisoVer	A3MDNGJGPF7QAM
199	QPIIN	A31X3KVKHGX7
200	Mosytuky	A1TEST1NMW15WH
201	Hryg	A1GC1WEDVK6FB6
202	Fuchen	A1V1AD6BKDPO8U
203	SA-Toy	A3DLNQTG66U2IT
204	Vosery	A12C06AY1IH91X
205	JHKKU	A2V62AFT5HT86F
206	Sletend	A1YMHNI860JLUC
207	Oplp	A3FHPT0209PWPM
208	JHKKU-M	AX7JX443U9X0E
209	DUNC	A991UTDY93GMB
210	Laprad	A398G1OCB6UPND
211	Gugusary	A3NAG322YD4R8M
212	GuangZhouZhongWuWangLuoKeJi18	AEYGPLW0MKM8
213	Meocouoe SYHC	A2LVBQRI9C4EZ2
214	Meocouoe	A1E9SBEPHXYFU
215	VitVerCosy	A3CR2WIAEFIUZJ
216	caiyougongmei	A3MGI13XRXWO5I
217	Ajusmeau	A3MI0JG0TX9JMT
218	linjunlinjunlinjun	AW23LQDA59LPL
219	tangyinxianboliyezhuangshizhuangxiu	A3F9GYDO22MGAI
220	Bulodou	A384XWNHEOHIFE
221	YZGO	AQBFB56PY342C
222	Zoofoo	A1XPM1L5985AZF
223	GZYMBKJYXGS	AEIU5NYN7LFH8
224	Invinch	A9WFRB8K1Q43
225	SUMERSUNSHIE	AMQ4O4SE8K5Y9
226	helloladies	A3L06A4GKDBJXD
227	HI MISS	A1K20H9PPGEDY4

Defendant Number	Store/Seller Name	Seller ID
228	NOVEBERSNO	A193IAYL8VXER8
229	VIKKO	A10JWCN9KNNMJ3
230	NJNT	A16MF57KCXFFUP
231	MicC	A18MCF5MHJSUSK
232	YXXCM	A3NAFGGOWQR5N8
233	GKM-GLOBAL	A15CD7CH9P4R4I
234	hasnatgulbaz	AES1K8A3VDS5Y
235	juniissl	A2CXY0E7B9TFY3
236	Chusheng	ASF6C29SJ1C6V
237	firstratecozyroom	AH7SHBVX7BNNY
238	NIxux	A2YXC0BAA4TMKE
239	MOFEIYUE	A2GDN85R1OZ64T
240	ANLife	A2W8DV7847479N
241	Jmwyyp	A3O4EBA7DCEZKG
242	TropicalLife	ADK61019F5MSD
243	Yxxwl	AVZRZLO6G83QF
244	LIUPAXC	A2G72Q91T2XXSS
245	GOwnerShop	AO43XOZK69CJ2
246	Jianjian PRINT	A124RERXUHHCRN
247	HONLERLY Decor	A2LHGDQQU0W942
248	xbofbool	A1BNYJNBIVO2PE
249	kingpan	A23EUKZGL7S7LI
250	Axolotl-US	A4SID42SJEK
251	CaLen	AWRA9X2JAUOS2
252	ZhoLing	A1I6MUZ1I658DH
253	Anang Communication	A1N6WO4PNW9CSE
254	FunHomie	A1RZJ8P86UO5QK
255	YUELAE	A1DYSU6KE4V9I3
256	ingbags	A2NEVJFH7Z94OB
257	BenYaSong	A1OY85HJVOIU01
258	ShoPen	A26WY76VQNYVRC
259	LanKen	A3RU86RBWBTTY
260	MeArtisticGift	A3V7WRGXOLLRZ1
261	hlgff	A26P9PCUL81BTC
262	hldfc	A3NVU1MP4HEFZT
263	Holidayoo	AUKUD55OKLHWW
264	USA Essentials Store	A115B0U2DREM2T
265	Home Products-US	A3LKOHHKFBOP6X
266	Jian T. Chen	A1F8E0LZ2MR603

Defendant Number	Store/Seller Name	Seller ID
267	CFLCKJ	A1BPA8KF7EHUAA
268	haorong store	A142RCHKDFVKSD
269	7Dots Art	A12EDA5J7XR5RK
270	HI GIRL	A27099AJ1HKGYT
271	GZBDKJYXGS	A11FTTCNMP2O8V
272	Nuolai	ALDO5810T82IV
273	Just for ur life	A312GPQAH18YN4
274	ZainProy	A1IEBO2UV39Q5B
275	Chrobak US	A27BYYQ757U6YZ
276	xuesongchengzhe	A46ZTWVJIBEV3
277	Douyins	A3AN2756ZBYHQX
278	Laidehusat	A2VHLSKYER2AQX
279	Musesh Shop	A12UYQ3NZC9VO2
280	joyprint	A3JCTFMMOJ1JTU
281	shenzhenyibalingqikejiyouxiangongsi	AULZC1MH7XPC9
282	NOMEDOGYlm	A2RHQ4961FEJUZ
283	HomeTrading-US	A2YEA4OLY4DSBA
284	Yuwouni	A10B8F5MEC9SJK
285	Dyviel	A34SIT173RK8Z3
286	Visual Artwork	AHQ5D47BI990B
287	Hljlj-US	A1E5BNWCU8HDW8
288	Yanchi Li	102893043
289	YongmoStore	101648981
290	MUCHENGGIFT BUSINESS LLC	101653342
291	Karu trade co.ltd	101537193
292	Hyeringe	101669035
293	Eumbyeal	101671647
294	Hwanyo	102482108
295	FXZZ DIY	102617365
296	dasluff	101694152
297	jinanbaoshulinshangmao	101673006
298	Yiwu Zhuoling Device Co., Ltd.	102518498
299	Leyu-US	102518302
300	Yiwu Lixin Trading Co., Ltd.	102518258
301	Yiwu Taoshi Trading Co., Ltd.	102518342
302	JinruiMY	102515147
303	Yiwu Ruifan Trading Co., Ltd.	102518457
304	ChuXiongShiJiaYangXian002	101649969
305	Home Boutique Corner	101276087

Defendant Number	Store/Seller Name	Seller ID
306	Embers Dream	634418219399029
307	EchoTees	634418222391220
308	Punbelievable Tees	634418222391177
309	BlueWave Swim	634418220182930
310	FenNijia	634418211494428
311	Gnomes love	634418220702371
312	Snuglio	634418222361414
313	BLATTT	634418218915869
314	DIYDrapr	634418222145810
315	UniqueBlend	634418219388643
316	YuanFlower	634418221472383
317	JPsunente	634418212277381
318	Parcelly	634418222256866
319	Deer Call decorate	634418223176332
320	Luming Home Textiles	634418219484555
321	Drapey	634418221717954
322	HLJP G	634418217814214
323	HLJP F	634418217433619
324	GOOD HS	634418219280940
325	WovenWhimsy	634418222366640
326	HLJP FF	634418218965165
327	Stampzy	634418222365690
328	DesignFlare	634418218767878
329	HLJPAA	634418218510682
330	PJM LC	634418218414050
331	Pressly	634418222365813
332	Travelstudio	634418217496790
333	StitchBloom	634418222147375
334	Royal Rugs Co	634418220457580
335	Design Essence	634418218242219
336	DesignDuds	634418219010446
337	Tailor Three	634418220309849
338	SewnUp	634418221722482
339	Yueyue processing plant local	634418216823340
340	QIyuansheng	634418224391901
341	LI AO Aries	634418218461122
342	Attire Space	634418218247255
343	CustomStitch	634418219523300
344	AestheticHaven	634418222324182

Defendant Number	Store/Seller Name	Seller ID
345	Home accessor oo	634418222367199
346	YJFXIAODIAN	634418222402922
347	LALAxiaodian	634418222398629
348	FlagVerve	634418222373082
349	Creative Outfit	634418218246691
350	MendMarvel	634418223979182
351	Inkora	634418222362292
352	LYHFW	634418222008155
353	Free Choice Bird	634418216681529
354	Win Home Textile	634418211341303
355	CWNA	634418218818386
356	Trojan	634418220531156
357	Izzy Shirt	634418220027447
358	FabThreads	634418219389258
359	LI AO Cancer sign	634418218461296
360	BJ Household products	5203255150724
361	Dinora local	634418215477066
362	Zhiyuan Ltd	4251422124772
363	be at home	634418211671161
364	Living Home Museum	634418217925247
365	BlissfulNestShop	634418219086953
366	GGPOST	634418219971323
367	DXY Digital canvas painting	634418221924444
368	HXC Digital canvas painting	634418221949185
369	Night trendy	634418223815701
370	feiliangle	634418222517177
371	LinYUxiang	634418221077948
372	IU Art posters	634418222899072
373	SewDream	634418222150081
374	HearthThreads	634418219523435
375	Wovely	634418221718268
376	HNXBWH	634418220527191
377	Tianzong Clothing Factory	4903905461877
378	FreePeelVerse	634418224631306
379	CloudyBlanket	634418223709909
380	WrapStar	634418223710020
381	VelvetHug Home	634418223116493
382	Xiyang Textile	634418214042212
383	Ivy Growth Poster	634418220964270

Defendant Number	Store/Seller Name	Seller ID
384	Guess what poster	634418220963042
385	UrbanCanvass	634418222961187
386	Artistic Canvas	634418223299968
387	Sevenlala Tees	634418222189927
388	LINGGONGCHENG	634418222543586
389	Get fit Get	634418222453708