

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

LEI TANG)	
)	
Plaintiff,)	Case No. 1:23-cv-16489
)	
v.)	Judge Charles P. Kocoras
)	
THE INDIVIDUALS, PARTNERSHIPS,)	Magistrate Jeannice W. Appenteng
AND UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE "A")	
)	
Defendants.)	

[proposed] ORDER ON PLAINTIFF’S MOTION FOR PRELIMINARY INJUNCTION

THIS CAUSE being before the Court on Plaintiff Lei Tang’s Motion for Entry of a Preliminary Injunction [Doc. 23] against the defendants identified in Schedule A to the Amended Complaint and attached hereto (collectively, the “Defendants”), and this Court having heard the evidence before it hereby GRANTS Plaintiff’s Motion in its entirety.

This Court further finds that it has personal jurisdiction over the defendants since the defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants are reaching out to do business with Illinois residents by advertising, marketing, and displaying on Defendants’ commercial, interactive internet stores in violation of Plaintiff’s Copyright Registration Nos. VA0002250612 and VA0002250627. [Declaration of Lei Tang at Doc. 6 at ¶¶ 5-8].

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order (“TRO”) [Doc. 17], should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff’s

previously granted Motion for Entry of a Temporary Restraining Order establishes that Plaintiff has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted.

Specifically, Plaintiff has proved a *prima facie* case of copyright infringement because (1) the Tang Works are registered with the United States Copyright Office, (2) Defendants are not licensed or authorized to use the Tang Works. Furthermore, Defendants' continued and unauthorized use of the Tang Works irreparably harm Plaintiff through diminished goodwill, damage to Plaintiff's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Plaintiff has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions. As such, this Court orders that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily enjoined and restrained from:
 - a. using Plaintiff's Tang Works, particularly in the marketing, advertising, offering for sale, or sale of any product not authorized by Plaintiff;
 - b. passing off, inducing, or enabling others to sell or market using Plaintiff's Tang Works;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
 - d. further infringing Plaintiff's Tang Works and/or damaging Plaintiff's goodwill;
 - e. otherwise competing unfairly with Plaintiff in any manner.

2. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

3. Any Third Party Providers, including Aliexpress, Amazon, DHGate, ebay, JOOM, PayPal, Payoneer, Sears, temu, Walmart, and Wish shall, within two (2) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:

- a. locate all accounts and funds connected to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any financial accounts connected to the information listed in Schedule A of the Amended Complaint hereto, the email address identified in Exhibit Two and Three to the Declaration of Lei Tang, [Doc. 8, 9] and any email addresses provided for Defendants by third parties; and
- b. restrain and enjoin any such accounts or funds from transferring or disposing of money or other of Defendants' assets until further ordered by this Court.

4. Plaintiff may provide notice of these proceedings to Defendants, including notice of the preliminary injunction hearing and service of process pursuant to Fed. R. Civ. P. 4(f)(3), by electronically publishing a link to the Complaint, any Amended Complaint, this Order and other relevant documents on a website and by sending an e-mail to the e-mail addresses identified in Exhibits Two and Three to the Declaration of Lei Tang, [Docs. 8, 9] and any email addresses provided for Defendants by third parties that include a link to said website.

5. The Clerk of the Court is directed to issue a single original summons in the name of "Fashion Store A8 and all other Defendants identified in the Complaint" that shall apply to all

Defendants. The combination of providing notice via electronic publication or e-mail, along with any notice that Defendants receive from any Third Party Providers, including Aliexpress, Amazon, DHGate, ebay, JOOM, PayPal, Payoneer, Sears, temu, Walmart, and Wish shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.

6. Plaintiff may provide notice of these proceedings to third parties by delivery of this Order and other relevant documents to the following Online Marketplace platforms, Financial Institutions and/or Third Party Service Providers at the following addresses:

- a. AliExpress: IPR-USTRO@aliexpress.com
- b. Amazon: tro-notices@amazon.com
- c. DHGate: patrol@dhgate.com
- d. EBay: TROs@ebay.com; rbringhurst@ebay.com
- e. JOOM: d.fadeeva@joom-contractors.com; ipr@joom.com
- f. PayPal: EEOMALegalSpecialist@paypal.com;
- g. Payoneer: VPOperations@Payoneer.com and/or holly.clancy@us.dlapiper.com;
melissa.godwin@us.dlapiper.com; thirdpartyrequests@payoneer.com
- h. PingPong Global Solutions Inc., Legal Department at legal@pingpongx.com
- i. Sears: RSPUHLER@mcandrews-ip.com
- j. Temu: legal@temu.com; steven.sheng@temu.com
- k. Walmart, Inc.: Jennifer.Johnson@walmartlegal.com and/or
Legal@walmartlegal.com; TROLegalComms@walmartlegal.com.
- l. Wish: Doro.Park@btlaw.com; Brittany.Smith@btlaw.com;
Dwight.Lueck@btlaw.com; Rocky.Cislak@btlaw.com

7. Amended Schedule A to the Complaint, [Doc. 5] Exhibits Two and Three to the Declaration of Lei Tang, [Doc. 8, 9] and the sealed Temporary Restraining Order [Doc. 17] are ordered unsealed.

8. A Five Thousand Dollar (\$5,000.00) bond shall be posted by Plaintiff and shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated. Plaintiff or its attorneys may remit the bond with the Clerk of Court in the form of a cashier check, law firm check, cash, or surety.

9. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two days' notice to Plaintiff or on shorter notice as set by this Court.

IT IS SO ORDERED.

Dated: February ___, 2024.

Charles P. Kocoras
United States District Judge

(Amended Schedule A on the Following Page)

AMENDED SCHEDULE A

1	AliExpress	Fashion Store A8
2	AliExpress	Fully furnished living Stores Store
3	AliExpress	GD-Accessories & Parts Store
4	AliExpress	Happiness House Decoration Store
5	AliExpress	Househeld Market Store
6	AliExpress	JJ Daily Tools Boutique Store
7	AliExpress	let us 857 Store
8	AliExpress	Newlife Aliexpress Global Homes Store
9	AliExpress	Shenzhen SuperDeal Store
10	AliExpress	Shop910544290 Store
11	AliExpress	Shop911351006 Store
12	AliExpress	TCKuMi store
13	AliExpress	Wilde Knight 003 Grocery Store
14	AliExpress	XingXing's Store
15	Amazon	A mango
16	Amazon	Adamely
17	Amazon	andiaifu
18	Amazon	Aourea
19	Amazon	bailiangqiche
20	Amazon	BetterLive
21	Amazon	Bibliotega
22	Amazon	Bimkole
23	Amazon	Celiy
24	Amazon	chengduaidisiw
25	Amazon	CHNILOVEU
26	Amazon	Cosylucickle
27	Amazon	crkeen
28	Amazon	Crown imperial
29	Amazon	Debuil
30	Amazon	demaonongyefazhanyouxiangongsi
32	Amazon	dexinsheqiyeguanlifuwu
33	Amazon	DFFSIT
34	Amazon	eisukenove
35	Amazon	FANGZHE
36	Amazon	Fasclot

37	Amazon	GuangZhouZaChengMaoYiYouXianGongSi1
38	Amazon	hangdian store
39	Amazon	jinketechnology
40	Amazon	Kaczmarek
42	Amazon	KINLOON JHX
43	Amazon	Kratos around the home
44	Amazon	Licini
45	Amazon	LILYLAC
46	Amazon	millenimu
47	Amazon	motifa
48	Amazon	ongdingg
49	Amazon	Opla3ofx
50	Amazon	Pengzhi Shop
52	Amazon	quwushangmao
53	Amazon	sasell99
54	Amazon	shaioner
55	Amazon	shuijiao
56	Amazon	Taxhui
57	Amazon	Tivolii
58	Amazon	TTHZM
59	Amazon	USA Good Product
60	Amazon	xixiaohuyuwenhuachuanbo
61	Amazon	YANGSUS
62	Amazon	yiwanli
63	Amazon	yudinghongshangmao
64	Amazon	ZHANBUS
65	Amazon	ZIYUMR
66	Amazon	zxbaers
67	Amazon	☞FIY Daily Shop 7-15 Days Delivery♥
68	Amazon	☞Woman Shoe Summer Deals☞♥
69	dhgate	shoppingcenter789
70	eBay	3cdeal_sfc
71	eBay	aiba3197
72	eBay	alpinetopline
73	eBay	avlargmainily
74	eBay	bigbigshow2012
75	eBay	bodhi1998
76	eBay	broadfashion
77	eBay	burro_natha
78	eBay	buybuyhappy_9

79	eBay	cfulimigs
80	eBay	clikli64
81	eBay	coffebeans00
82	eBay	ddpwq
83	eBay	dtrefdggfd-777
84	eBay	easyyourlifestore
85	eBay	gazechimp_us
86	eBay	gelivable.2u
87	eBay	glol1213ba
88	eBay	gofest
89	eBay	handmademall
90	eBay	hongteach
91	eBay	hutrsate51
92	eBay	kuailea88
93	eBay	leonardo-9770
94	eBay	maxbesty88
95	eBay	motorsdeals_sfc
96	eBay	motorsmarket_sfc
97	eBay	oneworldonedream39
98	eBay	pantagonize
99	eBay	powerpart-us
100	eBay	qb.studio
101	eBay	quality-assured-goods
102	eBay	ravishing18
103	eBay	sammysum09
104	eBay	shibaynu
105	eBay	sportsloving
106	eBay	thatkey
107	eBay	tomsfresh
108	eBay	wegarden2017
109	eBay	wehaveyoucovered
110	eBay	wishmart2014
111	eBay	yonat-37
112	Individual	bestyw
113	Individual	diamondartgifts
114	Individual	mialin

115	Joom	fortunateaaa Store
116	Sears	24hrs_mall
117	Sears	growkart
118	temu	xiangyudianzi
119	Walmart	7*24 Discount Shop
120	Walmart	Beauty Home life
121	Walmart	Biker s Biker Shop Inc
122	Walmart	Booyoo
123	Walmart	Bunny Technology Llc
124	Walmart	CentuneToon Home
125	Walmart	Clockweihongmin
126	Walmart	Commodity Cable Inc
127	walmart	Daupanzees
128	Walmart	JOOAN INTERNATIONAL INC
129	Walmart	just do it Shop
130	Walmart	KIKIO
131	Walmart	Lucky home
132	Walmart	MODERN HOMEZIE
133	Walmart	OCCASIONAL SPIRITS DECOR
134	Walmart	Rinhoo Trade
135	Walmart	Rise Tech Inc
136	Walmart	ROBOT-GXG INC.
137	Walmart	Shenzhenshi Huanjunshi Maoyi Youxiangongsi
138	Walmart	TOP Dream Furniture LLC
139	Walmart	Ukamosan Company Imp. & Exp. Ltd
140	Walmart	VISLAND
141	Walmart	WINDFALL INC
142	Walmart	Wuhan Landaerjia Maoyi Youxiangongsi
143	Walmart	YUNDER TRADE,INC.
144	Walmart	Zxz Trading Limited
145	Wish	7SharonMaggie
146	Wish	BevismImJzO
147	Wish	bfteletronic
148	Wish	bianxiaoyuer
149	Wish	bigcompany
150	Wish	delighted cabin
151	Wish	dingxiaopin
152	Wish	dinrongyan
153	Wish	Evenxiaosipin
154	Wish	fashionxbd

155	Wish	fengyuqing
156	Wish	FGDYANGVDB
157	Wish	FGXGKJCJFXHG
158	Wish	hailanfengqing
159	Wish	huhuazhen
160	Wish	Learn Learn
161	Wish	luyaoqiuna
162	Wish	maijia2022
163	Wish	mambapeach
164	Wish	Market Truts Crosk
165	Wish	mingmingwu
166	Wish	Natural green bedding
167	Wish	pengyueyuestoe
168	Wish	qiu7255
169	Wish	QR Fashion
170	Wish	quncunrendexiwang
171	Wish	shangpinnanzhuangpinpaizhekoudian
172	Wish	shumaxiaocheng
173	Wish	wangxg
174	Wish	Wiopo
175	Wish	xiyoudrink
176	Wish	yonghongxiaopu
177	Wish	yuanyinchi