

CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system on December 19, 2018.

/s/ Nicholas A. Kurtz

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Counsel for Plaintiffs
CREATIVE IMPACT INC., ZURU LLC,
and ZURU INC.

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Counsel for Plaintiffs
CREATIVE IMPACT INC., ZURU LLC,
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**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CREATIVE IMPACT INC.;)	
ZURU LLC;)	
ZURU INC.,)	
)	Case No.: 1:18-cv-07531
Plaintiffs,)	
)	
v.)	
)	
THE INDIVIDUALS, CORPORATIONS, LIMITED)	
LIABILITY COMPANIES, PARTNERSHIPS, AND)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE A HERETO,)	
)	
Defendants.)	

**MEMORANDUM IN SUPPORT OF PLAINTIFFS’
MOTION FOR MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION**

Plaintiffs CREATIVE IMPACT INC., ZURU LLC, and ZURU INC. (collectively “Plaintiffs”) submit this Memorandum in support of their Motion for Entry of a Preliminary Injunction (“Motion”).

MEMORANDUM OF LAW

I. INTRODUCTION AND SUMMARY OF ARGUMENT

Plaintiffs CREATIVE IMPACT INC., ZURU LLC, and ZURU INC. (collectively “Plaintiffs”) bring this action against the Defendants identified on Schedule A to the Complaint (collectively, the “Defendants”) for federal trademark infringement and counterfeiting (Count I), false designation of origin (Count II), and violation of the Illinois Uniform Deceptive Trade Practices Act (Count III). As alleged in the Complaint, Defendants are promoting, advertising, marketing, distributing, offering for sale, and selling counterfeit products in connection with Plaintiffs’ federally registered trademark (collectively, the “Counterfeit BUNCH O BALLOONS Products”), through various fully interactive commercial Internet websites operating under at least the Defendant Domain Names and Online Marketplace Accounts listed in Schedule A to the Complaint (collectively, the “Defendant Internet Stores”). In short, Defendants run a counterfeiting operation with disregard for anything except generating profits.

On November 20, 2018, the Court granted and entered a Temporary Restraining Order (“TRO”) [14]. On November 30, 2018, the Court extended the TRO to December 18, 2018 [19]. On December 17, 2018 [26]), the Court further extended the TRO to January 1, 2019.

The TRO authorized Plaintiffs to provide notice of these proceedings to Defendants by electronically publishing a link to the Complaint, the TRO, and other relevant documents on a website to which the Defendant Domain Names which are transferred to Plaintiffs’ control redirect or by sending an e-mail to any e-mail addresses provided for Defendants by third parties that includes a link to said website. Since and pursuant to entry of the TRO, the accounts associated with the Defendant Internet Stores have been frozen. *See* Declaration of Nicholas A. Kurtz (hereinafter “Kurtz Decl.”) at ¶ 6.

Plaintiffs respectfully requests that this Court convert the TRO to a preliminary injunction against Defendants so that they remain enjoined from the manufacture, importation, distribution, offering for sale, and sale of Counterfeit BUNCH O BALLOONS Products during the pendency of this litigation. As part of the Preliminary Injunction, Plaintiffs request that the Defendant Domain Names remain in Plaintiffs' control and that Defendants' accounts remain frozen until completion of these proceedings.

II. ARGUMENT

A. A Preliminary Injunction Extending Relief Already Granted in the TRO Is Appropriate.

Plaintiffs respectfully request that this Court convert the TRO to a preliminary injunction to prevent further unlawful conduct by Defendants. This Court, in addressing similar allegations of Internet-based counterfeiting, has also issued preliminary injunctions following a temporary restraining order. *See, e.g., Iron Maiden Holdings Ltd. v. Partnerships & Unincorporated Associations Identified on Schedule "A"*, No. 1:18-CV-1098, Document #: 23 (N.D. Ill. Mar. 6, 2018) (Alonso, J.) (granting *ex parte* temporary restraining order) (copy included in Declaration of Nicholas A. Kurtz).

B. This Court Has Already Found that the Requirements for a Preliminary Injunction Have Been Satisfied.

Because the standard for granting a TRO and the standard for granting a preliminary injunction are identical in this Circuit, the requirements for entry of a preliminary injunction extending the TRO have been satisfied. *See, e.g. Charter Nat'l Bank & Trust v. Charter One Fin., Inc.*, No. 1:01-cv-00905, 2001 WL 527404, *1 (N.D. Ill. May 15, 2001) (citations omitted); *see also Bulgari, S.p.A. v. Partnerships & Unincorporated Associations Identified On Schedule "A"*,

No. 14-CV-4819, 2014 WL 3749132, at *3 (N.D. Ill. July 18, 2014), report and recommendation adopted sub nom. *Bulgari, S.p.A. v. Partnerships & Unincorporated Associations Identified on Schedule 'A,'*, No. 14 CV 4819, 2014 WL 3765854 (N.D. Ill. July 29, 2014). A temporary restraining order or preliminary injunction may be issued upon a showing that: “(1) there is a reasonable likelihood that Plaintiff will succeed on the merits; (2) Plaintiff will suffer irreparable injury if the order is not granted because there is no adequate remedy at law; (3) the balance of hardships tips in Plaintiff’s favor; and (4) the public interest will not be disserved by the injunction.” *Columbia Pictures Indus., Inc. v. Jasso*, 927 F. Supp. 1075, 1076 (N.D. Ill. 1996).

Here, by virtue of this Court’s entry of the TRO, it has already found that the above requirements have been satisfied.

C. The Equitable Relief Sought Remains Appropriate.

The Lanham Act authorizes courts to issue injunctive relief “according to principles of equity and upon such terms as the court may deem reasonable, to prevent the violation of any right of the registrant of a mark” 15 U.S.C. § 1116(a).

First, the Domain Name transfer order remains appropriate. Plaintiffs seek a conversion of the TRO entered by this Court, allowing Plaintiffs to retain control of the Defendant Domain Names until the completion of these proceedings. Such equitable relief prevents the Defendants from further manufacture, importation, distribution, offering for sale, and sale of Counterfeit BUNCH O BALLOONS Products and provides notice to Defendants regarding these proceedings. Accordingly, Plaintiff respectfully requests that the injunctive relief already awarded be extended through the pendency of this case.

Second, the asset restraining order remains appropriate. Plaintiffs also request conversion of the TRO to a preliminary injunction so that Defendants’ accounts in U.S.-based financial

institutions remain frozen. Since entry of the TRO, the third parties have provided Plaintiffs with information, including the identification of accounts linked to the Defendant Internet Stores that were offering for sale and/or selling infringing BUNCH O BALLOONS Products. In the absence of a preliminary injunction, Defendants may attempt to move any assets from any accounts in U.S.-based financial institutions, including PayPal accounts, to an offshore account. Therefore, Defendants' assets should remain frozen for the remainder of the proceedings.

Further, the amount of damages to which Plaintiffs are entitled as set forth in the Complaint far exceeds any amount contained in any of the Defendants' frozen accounts. For example, Plaintiffs' prayer for relief requests statutory damages of not less than \$1,000 and not more than \$2,000,000 for each and every use of the BUNCH O BALLOONS trademark from each Defendant. In addition, and as established in Plaintiffs' TRO Memorandum, many federal courts, including the Northern District of Illinois, have granted orders preventing the fraudulent transfer of assets. Accordingly, an order continuing to freeze the Defendants' assets should be granted.

III. CONCLUSION

In view of the foregoing, Plaintiff respectfully requests that this Court enter the preliminary injunction.

Dated: December 19, 2018

Respectfully submitted,
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By: /s/ Nicholas A. Kurtz
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and ZURU INC.

4. On November 30, 2018, the Court extended the TRO to December 18, 2018 [19]. On December 17, 2018 [26]), the Court further extended the TRO to January 1, 2019.

5. Since receiving the TRO, I have been working diligently to ensure compliance with its terms by third parties. Specifically, I have corresponded with representatives of the three third-party payment processors for which the Defendants maintain accounts – AliPay, PayPal, and Wish (ContextLogic). These third-party payment processors have received the TRO and have begun identifying the Defendants' accounts.

6. Since and pursuant to entry of the TRO, the AliPay, PayPal, and Wish (ContextLogic) accounts associated with the Defendant Internet Stores have been frozen.

7. Further, since entry of the TRO, accounts associated with the Defendant Internet Stores have been given notice of this case by AliPay, PayPal, and/or Wish (ContextLogic).

8. Additionally, since the entry of the TRO, relevant documents in this case (namely the Complaint and TRO) have been published on a website (<http://dbllawyers.website/?case=18-07531>) to which the Defendant Domain Names that have been transferred to Plaintiffs control now redirect.

9. Plaintiffs are in the process of requesting transfer of the Defendant Domain Names.

10. I have been in contact with numerous Defendants and/or their counsel in this case regarding this case, including without limitation the settlement of claims against certain Defendants, and have provided those Defendants and/or their counsel copies of the Complaint and TRO in this case.

11. As of the filing of this Declaration, Plaintiffs have voluntarily dismissed the following Defendants:

Doe No.	Seller Name	Defendant Online Marketplace	Date
75	Loong	https://www.wish.com/product/57738be996d1537859e34444	12/14/18
109	simple happiness	https://mama.wish.com/c/57e945e6baae7c163ece5eff	12/19/18
113	Sugar&SpiceBowShop	https://www.wish.com/product/59d9fd446fdc517a3a361abf	12/7/18
114	SUNKI E-business LLC	https://www.wish.com/product/5948eb82e4308f1ddfa03066	12/7/18
121	Threepig	https://www.wish.com/product/594745c4d67cc16f0e89c010	12/19/18

12. Upon filing of Plaintiffs’ Motion for Preliminary Injunction, I will cause Plaintiffs’ papers to be published on the website (<http://dbllawyers.website/?case=18-07531>) to which the Defendant Domain Names that have been transferred to Plaintiffs control now redirect.

13. After entry of the Preliminary Injunction, I will have the Preliminary Injunction Order published on said website.

14. Further, after entry of the Preliminary Injunction, I will send an e-mail to any e-mail addresses provided for Defendants by third parties (and for which I have not previously communicated with) that includes a link to said website.

15. Attached hereto is a true and correct copy of the preliminary injunction order referred to in Plaintiffs’ Memorandum – *Iron Maiden Holdings Ltd. v. Partnerships & Unincorporated Associations Identified on Schedule "A"*, No. 1:18-CV-1098, Document #: 23 (N.D. Ill. Mar. 6, 2018) (Alonso, J.).

I declare under penalty of perjury that the foregoing is true and correct. Executed on December 19, 2018 in Chicago, Illinois.

/s/ Nicholas A. Kurtz
 Nicholas A. Kurtz

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I, the undersigned attorney, certify that I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system on November 14, 2018.

/s/ Nicholas A. Kurtz

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and ZURU INC.

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

IRON MAIDEN HOLDINGS LTD.,)
)
 Plaintiff,)
)
v.)
)
THE PARTNERSHIPS AND)
UNINCORPORATED ASSOCIATIONS)
IDENTIFIED ON SCHEDULE “A”,)
)
 Defendants.)

Case No.: 1:18-cv-1098
Judge Jorge L. Alonso
Magistrate Judge Michael T. Mason

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on IRON MAIDEN HOLDINGS LTD.’s (“IMHL”) motion for a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS Plaintiff’s Motion for Entry of a Preliminary Injunction in its entirety against the defendants identified in the Schedule A (collectively, the “Defendants”).

THIS COURT HEREBY 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. “In the context of cases like this one, that means a plaintiff must show that each defendant is actually operating an interactive website that is accessible in Illinois and that each defendant has aimed such site at Illinois by standing ready, willing and able to ship its counterfeit goods to customers in Illinois in particular (or otherwise has some sufficient voluntary contacts with the state).” *Am. Bridal & Prom Indus. Ass’n v. P’ships & Unincorporated Ass’ns Identified on Schedule A*, 192 F.Supp.3d 924, 934 (N.D. Ill. 2016). In this case, Plaintiff has presented screenshot evidence that each Defendant Internet Store is reaching out to do business with Illinois residents by operating one or more commercial, interactive

Internet Stores through which Illinois residents can and do purchase products using counterfeit versions of Plaintiffs' Trademark. See Docket No. 12 which include screenshot evidence confirming that each Defendant Internet Store does stand ready, willing and able to ship its counterfeit goods to customers in Illinois bearing infringing and/or counterfeit versions of the IRON MAIDEN trademarks, U.S. Trademark Registration Nos. 4,848,431; 3,840,031; 1,307,146; 1,306,972 and 1,308,370.

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("TRO") 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 IMHL's previously granted Motion for a Temporary Restraining Order establishes that IMHL has a likelihood of success on the merits; that no remedy at law exists; and that IMHL will suffer irreparable harm if the injunction is not granted.

Specifically, IMHL has proved a *prima facie* case of trademark infringement because (1) the IRON MAIDEN trademarks are a distinctive mark and registered with the U.S. Patent and Trademark Office on the Principal Register, (2) Defendants are not licensed or authorized to use any of the IRON MAIDEN trademarks, and (3) Defendants' use of the IRON MAIDEN trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with IMHL. Furthermore, Defendants' continued and unauthorized use of the IRON MAIDEN trademarks irreparably harms IMHL through diminished goodwill and brand confidence, damage to IMHL's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, IMHL 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. Accordingly, 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 IMHL's IRON MAIDEN or any reproductions, counterfeit 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 a genuine IRON MAIDEN product or not authorized by IMHL to be sold in connection with IMHL's IRON MAIDEN trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine IRON MAIDEN product or any other product produced by IMHL, that is not IMHL's or not produced under the authorization, control or supervision of IMHL and approved by IMHL for sale under IMHL's IRON MAIDEN trademarks;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of IMHL, or are sponsored by, approved by, or otherwise connected with IMHL;
 - d. further infringing IMHL's IRON MAIDEN trademarks and damaging IMHL's goodwill;
 - e. otherwise competing unfairly with IMHL in any manner;
 - f. shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner,

products or inventory not manufactured by or for IMHL, nor authorized by IMHL to be sold or offered for sale, and which bear any of IMHL's IRON MAIDEN trademarks or any reproductions, counterfeit copies or colorable imitations thereof;

- g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names, or any other domain name or online marketplace account that is being used to sell or is the means by which Defendants could continue to sell Counterfeit IRON MAIDEN Products; and
 - h. operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing IMHL's IRON MAIDEN trademarks or any reproductions, counterfeit copies or colorable imitations thereof that is not a genuine IRON MAIDEN product or not authorized by IMHL to be sold in connection with IMHL's IRON MAIDEN trademarks.
2. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afiliis Limited, CentralNic, Nominet, and the Public Interest Registry, within five (5) business days of receipt of this Order or prior to expiration of this Order, whichever date shall occur first, shall, at IMHL's choosing:
- a. unlock and change the registrar of record for the Defendant Domain Names to a registrar of IMHL's selection until further ordered by this Court, and the domain name registrars shall take any steps necessary to

transfer the Defendant Domain Names to a registrar of IMHL's selection until further ordered by this Court; or

b. disable the Defendant Domain Names and make them inactive and untransferable until further ordered by this Court.

4. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as Amazon, iOffer, and Alibaba Group Holding Ltd. along with any related Alibaba entities (collectively, "Alibaba"), social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendant Domain Names, and domain name registrars, shall within three (3) business days of receipt of this Order:

a. disable and cease providing services for any accounts through which Defendants engage in the sale of counterfeit and infringing goods using the IRON MAIDEN trademarks, including any accounts associated with the Defendants listed on the Schedule A;

b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the IRON MAIDEN trademarks; and

c. take all steps necessary to prevent links to the Defendant Domain Names identified on the Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Domain Names from any search index.

5. Defendants and any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of Defendants' websites at the

Defendant Domain Names or other websites operated by Defendants, including, without limitation, any online marketplace platforms such as iOffer and Alibaba, advertisers, Facebook, Internet Service Providers ("ISP"), web hosts, back-end service providers, web designers, sponsored search engine or ad-word providers, banks, merchant account providers, including PayPal, Alibaba, Western Union, third party processors and other payment processing service providers, shippers, and domain name registrars (collectively, the "Third Party Providers") shall, within five (5) business days after receipt of such notice, provide to IMHL expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

- a. The identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information;
- b. the nature of Defendants' operations and all associated sales and financial information, including, without limitation, identifying information associated with the Online Marketplace Accounts, the Defendant Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplace Accounts and Defendant Domain Names;
- c. Defendants' websites and/or any Online Marketplace Accounts;
- d. The Defendant Domain Names or any domain name registered by Defendants; and
- e. Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons

acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, WISH, Amazon, Alipay, Alibaba, Western Union, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

6. 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.
7. Western Union shall, within two (2) business days of receipt of this Order, block any Western Union money transfers and funds from being received by the Defendants identified in the Schedule A until further ordered by this Court.
8. PayPal, Inc. ("PayPal"), ContextLogic, Inc. ("WISH"), Amazon Payments, Inc. ("Amazon") and Alipay.com Co., Ltd./Alipay US, Inc. ("Alipay") 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 PayPal, WISH, Amazon, Alipay accounts connected to the information listed in the Schedule A hereto or the email addresses identified in Exhibit 2 to the Declaration of Paul Varley; and

- b. Restrain and enjoin any such accounts or funds that are non-U.S. foreign based from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
9. Any banks, savings and loan associations, payment processors, or other financial institutions, for any Defendant or any of Defendants' Online Marketplace Accounts or websites, shall within two (2) business days of receipt of this Order:
 - a. Locate all accounts and funds connected to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any accounts connected to the information listed in the Schedule A hereto or the email addresses identified in Exhibit 2 to the Declaration of Paul Varley; and
 - b. Restrain and enjoin such accounts from receiving, transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
10. IMHL 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, this Order and other relevant documents on a website to which the Defendant Domain Names which are transferred to IMHL's control will redirect, or by sending an e-mail to the e-mail addresses identified in Exhibit 2 to the Declaration of Paul Varley and any e-mail addresses provided for Defendants by third parties that includes a link to said website. The Clerk of Court is directed to issue a single original summons in the name of “[RockShop] rock store and all other Defendants identified in Complaint” the Schedule A 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 domain name registrars and payment processors, 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.

11. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two days' notice to IMHL or on shorter notice as set by this Court.
12. The \$10,000 bond posted by IMHL shall remain with the Court until a Final disposition of this case or until this Preliminary Injunction is terminated.

ENTERED:

3/6/18



Jorge L. Alonso
United States District Judge

SCHEDULE A

No.	DEFENDANTS
1	[RockShop] rock store
2	2015 Dream Jewelry Store
3	Amy's Store
4	Anime Costume Factory Store
5	ANNA JEWELRY Store
6	Anny Boutique Bag Store
7	Antidazzle good design Store
8	Antidazzle Imagine Creation Store
9	AOXUAN CLOTHING CO.,Ltd
10	Autumn wind clothing franchise stores
11	Bag For Everybody
12	BSH Flags Store
13	can't copy fashion store
14	Chongqing ShengXinDa Trade Co., Ltd.
15	crazyee
16	Dancingman
17	DARBY JOAR Store
18	ddartoilpainting
19	Dehua Across Gift Co., Ltd.
20	dg88090431
21	Dreamland of Beauty
22	ESDY Army Store
23	Excellent shoes network
24	fashionhoodies
25	Fresunshine Store
26	Green_love_open
27	haozhonghong
28	Happy Goods Store
29	Heejues Store
30	HEYu jewelry Official Store
31	HSIC Store
32	iDIYSCASES Store
33	jasonjunxin
34	kaiye Store
35	KOKOKO Store
36	LadyShip
37	Meng cat women's clothing
38	Mens World Tshirts Store

39	Minason Silicon Valley Store
40	Mr.17 rock shop
41	Myself6699
42	NLKING 001 Store
43	NOAHCOSY Store
44	North_yang
45	personality good Store
46	PonyHouse Pandamaestro
47	PrettySunshine Jewellery Store
48	RIOT official flagship store
49	S C Factory Outlet Store Store
50	s9 Store
51	Shop2955144 Store
52	Sprig
53	Standing Man Store
54	stylish phone cases Store
55	Summerh
56	Superstore Store
57	SweeTees Store
58	TONGXINGWOLF Store
59	Top Fashion Apparel Co.,Ltd
60	Vanpolee Jewelry
61	Vast Flag
62	Vintage Stuff
63	wangyihan2013
64	Warhammer Quality Store
65	WE CAN FLY Store
66	Week onion tide shop
67	Wishgirl Store
68	xiaoyh
69	Yang Xiuhua
70	Yaya Tshirts Store
71	Ycc3831893
72	Yiwu Jewelry Co., Ltd.
73	Yiwu Mo Chun Jewelry Co., Ltd.
74	yiwuliming Store
75	108goods
76	agoozon
77	Aimeila
78	Arsyadishop

79	Athenayrt
80	AWDIP US
81	beckem_egan
82	Best4Buy
83	BestNineFive
84	BoGuze
85	Bolany
86	BTX Toys
87	Cecil Eleanor Peter
88	clickon Orin
89	cybersavs
90	deshienter
91	Dhe-Vengance
92	dirk1989
93	dreamcustom
94	Filyds
95	Fizh Custom Shop
96	FOGshop
97	gebgidxcwkpoa
98	Gift Personality
99	gogogods
100	GreenLabel
101	HangZhouZhuoBiaoMaoYiYouXianGongSi
102	Happypatch
103	HEI222
104	HELLO SIAM
105	hhgfddoo
106	Hope & Faith Sales
107	IntuchShirts
108	jkjsdfhgis
109	JMPTWY
110	Johnny Learn to Rock
111	kikikikik
112	Kings sewing
113	kleenplus
114	Leygin
115	liyy
116	Mermaid Shop
117	MNC SHOP.
118	Openss

119	PATCHCUBE
120	Platinum Stuff
121	POP Creation
122	Poster Outlet
123	quartett
124	reprowiwi
125	Repuai
126	Rock n' Roll T-SHIRT
127	Romanzy
128	Seeing one shop
129	shengjieruiqiche
130	Skyline Patch Shop
131	songhao
132	Sukohu
133	Thai Vintage
134	The Banyan Tee - TBT
135	Thebuttons
136	Think Patch
137	thinkcreation9
138	THKJI
139	Visor&Caps
140	W Expert
141	wa7ten
142	wanghuaikun
143	YACOPO-US
144	yangwancheng
145	yueqiang