

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

LIFE VAC LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
THE INDIVIDUALS, CORPORATIONS,	)	Case No.: 1:23-cv-16233
LIMITED LIABILITY COMPANIES,	)	
PARTNERSHIPS, AND UNINCORPORATED	)	
ASSOCIATIONS IDENTIFIED ON SCHEDULE	)	
A TO THE COMPLAINT,	)	
	)	
Defendants.	)	

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**PLAINTIFF’S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION  
AND TO EXTEND THE TEMPORARY RESTRAINING ORDER**

Plaintiff LIFE VAC LLC hereby moves the Court for Entry of a Preliminary Injunction against the Defendants listed on Schedule A to the Declaration of Christopher Tom filed concurrently herewith. The scope of the Preliminary Injunction is substantially identical to the Temporary Restraining Order (“TRO”) entered by the Court on December 8, 2023 (Dkt. 19), which is currently in place until January 5, 2023. (Dkt. 24)

Plaintiff also moves this Court to extend the TRO until there is a ruling on this Motion.

A Memorandum of Law and further Declaration of Christopher Tom in Support are filed concurrently with this Motion.

Dated: January 3, 2024

Respectfully submitted,  
BOIES SCHILLER FLEXNER LLP  
By: /s/ Christopher Tom  
Christopher Tom  
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New York, NY 1001  
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Attorney for Plaintiff Life Vac LLC



**MEMORANDUM OF LAW**

Plaintiff Life Vac LLC (“Plaintiff”) submits this Memorandum in support of its Motion for Entry of a Preliminary Injunction (“Motion”) against the Defendants listed on Schedule A to the Declaration of Christopher Tom filed concurrently herewith (“PI Defendants”) and to Extend the Temporary Restraining Order until there is a ruling on this Motion.

**I. INTRODUCTION AND SUMMARY OF ARGUMENT**

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

In its Motion for Temporary Restraining Order and supporting memorandum (Dkt. 10), which are referenced and incorporated herein, Plaintiff outlined its entitlement to emergency injunctive relief under this Circuit’s standards. On December 8, 2023, the Court entered a Temporary Restraining order. (Dkt. 20). On December 28, 2023, the Court extended the Temporary Restraining Order (“TRO”) until January 5, 2024 (Dkt. 24).

The TRO authorized Plaintiff to provide notice of these proceedings to PI Defendants by electronically publishing a link to the Complaint, the TRO, and other relevant documents on a website and by sending an e-mail to any e-mail addresses provided for PI Defendants by third

parties that includes a link to said website. Since and pursuant to entry of the TRO, upon information and belief the accounts identified to date by the marketplace platforms and financial institutions associated with the PI Defendants' Internet Stores have been frozen. *See* Declaration of Christopher Tom (hereinafter "Tom Decl.") ¶ 5.

Plaintiff respectfully requests that at this time this Court convert the TRO to a preliminary injunction against PI Defendants so that they remain enjoined from the manufacture, importation, distribution, offering for sale, and sale of Counterfeit Products during the pendency of this litigation. As part of the Preliminary Injunction, Plaintiff requests that the PI Defendants' Internet Stores remain disabled, that advertising of PI Defendants' Counterfeit Products remain disabled, and that PI Defendants' accounts remain frozen until further order by this Court. Plaintiff also request that the TRO be extended until there is a ruling on this Motion.

## **II. ARGUMENT**

### **A. A Preliminary Injunction Against PI Defendants Extending Relief Already Granted in the TRO Is Appropriate.**

Plaintiff respectfully requests that this Court convert the TRO to a preliminary injunction to prevent further unlawful conduct by PI Defendants. This district, in addressing similar allegations of Internet-based counterfeiting, has also issued preliminary injunctions following a temporary restraining order. *See, e.g., Zuru (Singapore) Pte., Ltd. et al v. The Individuals, Corporations, Limited Liability Companies, and Unincorporated Associations Identified in Schedule A Hereto*, No.: 1:21-cv-02151, Document # 19 (N.D. Ill. May 20, 2021) (granting orders requested herein in a similar case involving plaintiffs' trademarks and copyright works); *Zuru (Singapore) Pte., Ltd. et al v. The Individuals, Corporations, Limited Liability Companies, and Unincorporated Associations Identified in Schedule A Hereto*, No.: 1:21-02180, Document # 39 (N.D. Ill. June 2, 2021) (same); *Zuru (Singapore) Pte., Ltd. et al v. The Individuals, Corporations, Limited Liability*

*Companies, and Unincorporated Associations Identified in Schedule A Hereto*, No.: 1:21-02723, Document #23 (N.D. Ill. June 3, 2021) (granting orders requested herein in a similar case involving plaintiffs' trademarks and copyright works); *Creative Impact Inc. et al v. The 475 Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A Hereto*, No.:1:19-cv-05907, Document #31 (N.D. Ill. Oct. 18, 2019) (granting orders requested herein in a similar case involving plaintiffs' trademark); *Creative Impact Inc. et al v. The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A Hereto*, No. 1:18-cv-07531, Document # 30 (N.D. Ill. Dec. 21, 2018) (granting order requested herein in case involving plaintiffs' trademark).<sup>1</sup>

**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, at \*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

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<sup>1</sup> Upon the Court's request, Plaintiff will provide the Court with any filings in the similar cases No.1:21-cv-02151, No. 1:21-02180; No. 1:21-02723, No.1:19-cv-05907 and No. 1:18-cv-07531.

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 already found that the above requirements have been satisfied based on the initial pleadings. Despite notice having been given, no PI Defendants have appeared or challenged any of the well-pleaded allegations in Plaintiff's Complaint and supporting materials.

**C. The Equitable Relief Sought Remains Appropriate.**

Under the Copyright Act, a court is authorized to issue injunctive "upon such terms as the court may deem reasonable to prevent or restraint infringement of a copyright." 17 U.S.C. § 502(a). Plaintiff requests that the PI Defendants' Internet Stores remain disabled, that advertising of PI Defendants' Counterfeit Products remain disabled, and that PI Defendants' accounts remain frozen until further order by this Court.

First, the order disabling the PI Defendants' Internet Stores remains appropriate. Plaintiff seeks a conversion of the TRO entered by this Court, directing the platforms and domain name registries for the PI Defendants' Internet Stores to disable the PI Defendants' Internet Stores and make them inactive and untransferable until further order by this Court. Such equitable relief prevents PI Defendants from further manufacture, importation, distribution, offering for sale, and sale of Counterfeit Products and provides notice to PI Defendants regarding these proceedings. Accordingly, Plaintiff respectfully requests that the injunctive relief already awarded be extended through the pendency of this case.

Second, the order disabling advertising of PI Defendants' Counterfeit Products remains appropriate. Plaintiff seeks a conversion of the TRO entered by this Court, directing Third Party Providers, as defined in the TRO, to disable and cease displaying any advertisements used by or

associated with PI Defendants in connection with the sale of Counterfeit Products. Such equitable relief prevents the PI Defendants from further offering for sale and selling Counterfeit Products and provides notice to PI Defendants regarding these proceedings. Accordingly, Plaintiff respectfully requests that the injunctive relief already granted against PI Defendants be extended through the pendency of this case.

Third, the asset restraining order remains appropriate. Plaintiff also requests conversion of the TRO to a preliminary injunction so that PI Defendants' accounts in U.S.-based financial institutions remain frozen. Since entry of the TRO, Plaintiff has been working with the third parties to obtain information, including the identification of accounts linked to the PI Defendant Internet Stores that were offering for sale and/or selling infringing Life Vac products. In the absence of a preliminary injunction, PI Defendants may attempt to move any assets from any accounts in U.S.-based financial institutions, including PayPal accounts, to an offshore account. Therefore, particularly to preserve Plaintiff's equitable right to an accounting, PI Defendants' assets should remain frozen for the remainder of the proceedings.

Further, the amount of damages to which Plaintiff is entitled as set forth in the Complaint likely far exceeds any amount contained in any of the PI Defendants' frozen accounts. For example, Plaintiff's prayer for relief requests statutory damages of not less than \$750 and not more than \$150,000 for each and every infringement of Plaintiff's copyright from each Defendant. In addition, and as established in Plaintiff's 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 PI Defendants' assets should be granted.

**D. There is Good Cause to Extend the Temporary Restraining Order Until There is a Ruling on this Motion.**

In the event that the Court does not rule on this Motion before the current TRO expiration date (January 5, 2024), Plaintiff also seeks to extend the TRO to maintain the status quo until there is a ruling on Plaintiff's Motion for Entry of a Preliminary Injunction. Rule 65 dictates that under ordinary circumstances, a temporary restraining order cannot exceed 14 days, although the court may extend it "for a like period" for good cause. Fed. R. Civ. P. 65(b)(2). However, in *H-D Mich., LLC v. Hellenic Duty Free Shops S.A.*, the Seventh Circuit affirmed that allowing a TRO to remain in effect until a decision on a motion for preliminary injunction was proper. 694 F.3d 827, 843-45 (7th Cir. 2012). In affirming the TRO extension, the Seventh Circuit explicitly recognized that there will be cases where the maximum 28-day limit does not give the parties sufficient time to prepare for a preliminary injunction hearing. *Id.* If the extension exceeds the maximum duration for a TRO under Rule 65(b), the extension "becomes in effect a preliminary injunction that is appealable, but the order remains effective." *Id.* at 844. See also *Christian Dior Couture, S.A. v. The P'ships*, No. 21-cv-04861 (N.D. Ill. Nov. 19, 2021) (Dkt. No. 32) (further extending TRO to and including the date on which the Court would adjudicate the motion for preliminary injunction, exceeding the maximum duration for a TRO under Rule 65(b)); *Luxottica Group S.p.A. v. rbzxr.com*, No. 20-cv-02297 (N.D. Ill. May 12, 2020) (Dkt. No. 52) (same).

PI Defendants have notice of this case and this pending Motion and have presented no evidence of hardship that would occur by keeping the TRO in place to date. In addition, Plaintiff respectfully submits that there is good cause to extend the TRO, since there is a high probability that the PI Defendants will continue to harm Plaintiff without the TRO in place, especially since PI Defendants have notice of this case. Specifically, PI Defendants will likely attempt to move any



assets from their financial accounts to offshore bank accounts without the TRO in place while this Motion is pending.

### III. CONCLUSION

In view of the foregoing, Plaintiff respectfully requests that this Court enter the preliminary injunction against the PI Defendants listed on Schedule A to the Declaration of Christopher Tom filed concurrently herewith and to extend the Temporary Restraining Order until there is a ruling on this Motion.

Dated: January 3, 2024

Respectfully submitted,

BOIES SCHILLER FLEXNER LLP

By: /s/Christopher Tom  
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*Attorney for Plaintiff Life Vac LLC*

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

LIFE VAC LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No.: 1:23-cv-16233
	)	
THE INDIVIDUALS, CORPORATIONS,	)	
LIMITED LIABILITY COMPANIES,	)	
PARTNERSHIPS, AND UNINCORPORATED	)	
ASSOCIATIONS IDENTIFIED ON SCHEDULE	)	
A TO THE COMPLAINT,	)	
	)	
Defendants.	)	
	)	
	)	
	)	
	)	

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**DECLARATION OF CHRISTOPHER TOM**

I, Christopher Tom, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.
  
2. I am an attorney at law, duly admitted to practice before the United States District Court for the Northern District of Illinois. I am one of the attorneys for Plaintiff LIFE VAC LLC in this action. This declaration is provided in support of Plaintiff’s Motion for Entry of a Preliminary Injunction (“Motion”) against the Defendants listed on Schedule A to this Declaration that are subject to the Motion (“PI Defendants”) and to Extend the Temporary Restraining Order until there is a ruling on this Motion.
  
3. On December 8, 2023, the Court granted and entered the Temporary Restraining Order in this action. (Dkt. 20).

4. On December 28, 2023, the Court extended the Temporary Restraining Order (“TRO”) to January 5, 2024. (Dkt 24).

5. Since receiving the TRO, attorneys for the Plaintiff have been working diligently to ensure compliance with its terms by parties. Specifically, I, or others working under my direction, have corresponded with representatives of the third-party marketplace platforms, domain registrars, and payment processors for which the defendants maintain accounts, including, but not limited to, AliExpress, Amazon, DHGate, eBay, Enom, and Wish.

6. Upon information and belief, since and pursuant to the terms of the entered TRO, the accounts identified to date by third parties AliExpress, Amazon, DHGate, eBay, Enom, and Wish as associated with the PI Defendants’ Internet Stores have been frozen.

7. Based on the expedited discovery obtained by Plaintiff pursuant to the TRO, Plaintiff has served process by electronically publishing a link to the Summons, Complaint, the TRO, and other relevant documents on the website <http://lifevac-cases.com/case-23-cv-16233.html> and, through counsel, has sent an e-mail with copies of the Complaint, TRO, Summons, and a link to said website to the e-mail addresses provided for PI Defendants by third parties AliExpress, Amazon, DHGate, eBay, Enom, and Wish.

8. I have, or someone under my direction has, been in contact with the PI Defendant Internet Stores and/or their counsel regarding this case, including without limitation the settlement of claims against certain Defendants, and have provided Defendants and/or their counsel copies of the Complaint in this case when requested.

9. Upon filing of Plaintiff’s Motion for Preliminary Injunction, I will cause Plaintiff to publish the preliminary injunction papers on the website <http://lifevac-cases.com/case-23-cv-16233.html>, and I, or others working under my direction, will send an e-mail to the e-mail

addresses provided for the Defendants by third parties that includes a link to said website. For the avoidance of doubt, the Defendants have been expressly made aware of and have been given direct access to that website.

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

11. Further, after entry of the Preliminary Injunction, I will send an e-mail to the e-mail addresses provided for the PI Defendants by third parties) that includes a link to said website.

I declare under penalty of perjury that the foregoing is true and correct. Executed on January 3, 2024, in Cranford, New Jersey.

*/s/Christopher Tom*

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Christopher Tom

**Schedule A to Preliminary Injunction Motion**

<b>No.</b>	<b>Defendants</b>	<b>Defendants Online Marketplace(s)</b>
3.	AliExpress Fishing Tackle Store	<a href="https://www.aliexpress.com/store/1102082167">https://www.aliexpress.com/store/1102082167</a>
4.	Anime Mobile Accessories Store	<a href="https://www.aliexpress.com/store/1102440531">https://www.aliexpress.com/store/1102440531</a>
5.	Bafangsuda 1001 Store	<a href="https://www.aliexpress.com/store/1101862374">https://www.aliexpress.com/store/1101862374</a>
6.	BAMD 3C GU Store	<a href="https://www.aliexpress.com/store/1102876821">https://www.aliexpress.com/store/1102876821</a>
7.	Better Life For You Store	<a href="https://www.aliexpress.com/store/1102202020">https://www.aliexpress.com/store/1102202020</a>
8.	Bingo Outdoor Store	<a href="https://www.aliexpress.com/store/1102602255">https://www.aliexpress.com/store/1102602255</a>
9.	Blade Outdoor Fun Store Store	<a href="https://www.aliexpress.com/store/1102826699">https://www.aliexpress.com/store/1102826699</a>
10.	Bonytain Official Store	<a href="https://www.aliexpress.com/store/1101218941">https://www.aliexpress.com/store/1101218941</a>
11.	Brace Support Store	<a href="https://www.aliexpress.com/store/1103012324">https://www.aliexpress.com/store/1103012324</a>
12.	Buyready Cycling Store	<a href="https://www.aliexpress.com/store/1103037732">https://www.aliexpress.com/store/1103037732</a>
13.	Camping Adventure Store	<a href="https://www.aliexpress.com/store/1102696715">https://www.aliexpress.com/store/1102696715</a>
14.	CE MASK FFP2 Store	<a href="https://www.aliexpress.com/store/1101689793">https://www.aliexpress.com/store/1101689793</a>
15.	Cycling Bicycle Parts Store	<a href="https://www.aliexpress.com/store/1102660295">https://www.aliexpress.com/store/1102660295</a>
16.	Daily fitness Store	<a href="https://www.aliexpress.com/store/1101953359">https://www.aliexpress.com/store/1101953359</a>
17.	Dobelziter Outdoors Store	<a href="https://www.aliexpress.com/store/1102997549">https://www.aliexpress.com/store/1102997549</a>
18.	DoubleCamp Store	<a href="https://www.aliexpress.com/store/1101490473">https://www.aliexpress.com/store/1101490473</a>
19.	Dropshipme Home Store	<a href="https://www.aliexpress.com/store/1102251858">https://www.aliexpress.com/store/1102251858</a>
20.	Factory Promotion Discount Store	<a href="https://www.aliexpress.com/store/1101519259">https://www.aliexpress.com/store/1101519259</a>
21.	FFP2 KN95 Store	<a href="https://www.aliexpress.com/store/1101538496">https://www.aliexpress.com/store/1101538496</a>
22.	Good Healthy Care Store	<a href="https://www.aliexpress.com/store/1101949386">https://www.aliexpress.com/store/1101949386</a>
23.	Healthful Care Store	<a href="https://www.aliexpress.com/store/1101949928">https://www.aliexpress.com/store/1101949928</a>
24.	High-end Outdoor Products Store	<a href="https://www.aliexpress.com/store/1102024767">https://www.aliexpress.com/store/1102024767</a>
25.	hIGHWIF Store	<a href="https://www.aliexpress.com/store/1101341831">https://www.aliexpress.com/store/1101341831</a>
26.	Homeuse Healthy Factory Store	<a href="https://www.aliexpress.com/store/1101815464">https://www.aliexpress.com/store/1101815464</a>
27.	House output Store	<a href="https://www.aliexpress.com/store/1101415547">https://www.aliexpress.com/store/1101415547</a>
28.	Kevin Sports Equipment Store	<a href="https://www.aliexpress.com/store/1103010295">https://www.aliexpress.com/store/1103010295</a>
29.	KUAILE Yongdong Store	<a href="https://www.aliexpress.com/store/1101762090">https://www.aliexpress.com/store/1101762090</a>
30.	Lavkuom Official Store	<a href="https://www.aliexpress.com/store/1101950242">https://www.aliexpress.com/store/1101950242</a>
31.	L-Cycling 55 Store	<a href="https://www.aliexpress.com/store/1101812724">https://www.aliexpress.com/store/1101812724</a>

<b>No.</b>	<b>Defendants</b>	<b>Defendants Online Marketplace(s)</b>
32.	Lifevac Equipment Store	<a href="https://www.aliexpress.com/store/1102790218">https://www.aliexpress.com/store/1102790218</a>
33.	Male World Store	<a href="https://www.aliexpress.com/store/1102100028">https://www.aliexpress.com/store/1102100028</a>
34.	MengNen Store	<a href="https://www.aliexpress.com/store/1101816801">https://www.aliexpress.com/store/1101816801</a>
35.	Missing You VV Store	<a href="https://www.aliexpress.com/store/1102978744">https://www.aliexpress.com/store/1102978744</a>
36.	Monclique Health Care Store	<a href="https://www.aliexpress.com/store/1102418273">https://www.aliexpress.com/store/1102418273</a>
37.	Moving Protect Store	<a href="https://www.aliexpress.com/store/1101762369">https://www.aliexpress.com/store/1101762369</a>
38.	Mozhoupai Household Merchandises Store	<a href="https://www.aliexpress.com/store/1102822381">https://www.aliexpress.com/store/1102822381</a>
39.	Nine Official Store	<a href="https://www.aliexpress.com/store/1102828272">https://www.aliexpress.com/store/1102828272</a>
40.	Outdoor Bag Store	<a href="https://www.aliexpress.com/store/1102493134">https://www.aliexpress.com/store/1102493134</a>
41.	Outdoor cycling bike Store	<a href="https://www.aliexpress.com/store/1101570704">https://www.aliexpress.com/store/1101570704</a>
42.	Outdoor Entertainment Dropshipping Store	<a href="https://www.aliexpress.com/store/1101425020">https://www.aliexpress.com/store/1101425020</a>
43.	Outdoor Everything Experience Store	<a href="https://www.aliexpress.com/store/1101454675">https://www.aliexpress.com/store/1101454675</a>
44.	Outdoor Ventilation Store	<a href="https://www.aliexpress.com/store/1102794646">https://www.aliexpress.com/store/1102794646</a>
45.	OwlSight Tactical Gear Store	<a href="https://www.aliexpress.com/store/1101876401">https://www.aliexpress.com/store/1101876401</a>
46.	RLKR RESCUE Store	<a href="https://www.aliexpress.com/store/1102421883">https://www.aliexpress.com/store/1102421883</a>
47.	Safty Relax Store	<a href="https://www.aliexpress.com/store/1101434371">https://www.aliexpress.com/store/1101434371</a>
48.	Shop1100390803 Store	<a href="https://www.aliexpress.com/store/1100392798">https://www.aliexpress.com/store/1100392798</a>
49.	Shop1102066021 Store	<a href="https://www.aliexpress.com/store/1102063903">https://www.aliexpress.com/store/1102063903</a>
50.	Shop1102153727 Store	<a href="https://www.aliexpress.com/store/1102152783">https://www.aliexpress.com/store/1102152783</a>
51.	Shop1102163224 Store	<a href="https://www.aliexpress.com/store/1102169136">https://www.aliexpress.com/store/1102169136</a>
52.	Shop1102175178 Store	<a href="https://www.aliexpress.com/store/1102178137">https://www.aliexpress.com/store/1102178137</a>
53.	Shop1102378070 Store	<a href="https://www.aliexpress.com/store/1102372115">https://www.aliexpress.com/store/1102372115</a>
54.	Shop1102552144 Store	<a href="https://www.aliexpress.com/store/1102549162">https://www.aliexpress.com/store/1102549162</a>
55.	Shop1102694913 Store	<a href="https://www.aliexpress.com/store/1102699882">https://www.aliexpress.com/store/1102699882</a>
56.	Shop1102703040 Store	<a href="https://www.aliexpress.com/store/1102703041">https://www.aliexpress.com/store/1102703041</a>
57.	Shop1102727455 Store	<a href="https://www.aliexpress.com/store/1102725496">https://www.aliexpress.com/store/1102725496</a>
58.	Shop1102799204 Store	<a href="https://www.aliexpress.com/store/1102799205">https://www.aliexpress.com/store/1102799205</a>
59.	Shop1102823237 Store	<a href="https://www.aliexpress.com/store/1102823238">https://www.aliexpress.com/store/1102823238</a>
60.	Shop1102831129 Store	<a href="https://www.aliexpress.com/store/1102830112">https://www.aliexpress.com/store/1102830112</a>
61.	Shop1102857727 Store	<a href="https://www.aliexpress.com/store/1102858698">https://www.aliexpress.com/store/1102858698</a>
62.	Shop1102857967 Store	<a href="https://www.aliexpress.com/store/1102867029">https://www.aliexpress.com/store/1102867029</a>

<b>No.</b>	<b>Defendants</b>	<b>Defendants Online Marketplace(s)</b>
63.	Shop1102914877 Store	<a href="https://www.aliexpress.com/store/1102907898">https://www.aliexpress.com/store/1102907898</a>
64.	Shop1102938517 Store	<a href="https://www.aliexpress.com/store/1102950026">https://www.aliexpress.com/store/1102950026</a>
65.	Shop1102962786 Store	<a href="https://www.aliexpress.com/store/1102977495">https://www.aliexpress.com/store/1102977495</a>
66.	Shop1102966006 Store	<a href="https://www.aliexpress.com/store/1102966007">https://www.aliexpress.com/store/1102966007</a>
67.	Shop1102994805 Store	<a href="https://www.aliexpress.com/store/1102991831">https://www.aliexpress.com/store/1102991831</a>
68.	Shop1102999580 Store	<a href="https://www.aliexpress.com/store/1102997549">https://www.aliexpress.com/store/1102997549</a>
69.	Shop1103100220 Store	<a href="https://www.aliexpress.com/store/1103100221">https://www.aliexpress.com/store/1103100221</a>
70.	Shop1103129103 Store	<a href="https://www.aliexpress.com/store/1103136084">https://www.aliexpress.com/store/1103136084</a>
71.	Shop1103151298 Store	<a href="https://www.aliexpress.com/store/1103128739">https://www.aliexpress.com/store/1103128739</a>
72.	Shop1103171071 Store	<a href="https://www.aliexpress.com/store/1103171072">https://www.aliexpress.com/store/1103171072</a>
73.	Shop1928100 Store	<a href="https://www.aliexpress.com/store/1101139428">https://www.aliexpress.com/store/1101139428</a>
74.	Shop4415079 Store	<a href="https://www.aliexpress.com/store/1101420305">https://www.aliexpress.com/store/1101420305</a>
75.	Shop4488021 Store	<a href="https://www.aliexpress.com/store/1101299383">https://www.aliexpress.com/store/1101299383</a>
76.	Shop912663023 Store	<a href="https://www.aliexpress.com/store/1101948454">https://www.aliexpress.com/store/1101948454</a>
77.	Sinan Store	<a href="https://www.aliexpress.com/store/1101432881">https://www.aliexpress.com/store/1101432881</a>
78.	Supercaring Store	<a href="https://www.aliexpress.com/store/1101655752">https://www.aliexpress.com/store/1101655752</a>
79.	TK-A Store	<a href="https://www.aliexpress.com/store/1102037474">https://www.aliexpress.com/store/1102037474</a>
80.	Tkihney Store	<a href="https://www.aliexpress.com/store/1101824999">https://www.aliexpress.com/store/1101824999</a>
81.	To Be Stronger Store	<a href="https://www.aliexpress.com/store/1101423890">https://www.aliexpress.com/store/1101423890</a>
82.	Tulkera Sports Store	<a href="https://www.aliexpress.com/store/1102493139">https://www.aliexpress.com/store/1102493139</a>
83.	Very Interesting Store	<a href="https://www.aliexpress.com/store/1102855447">https://www.aliexpress.com/store/1102855447</a>
84.	Wandering The World Outdoors Store	<a href="https://www.aliexpress.com/store/1103020117">https://www.aliexpress.com/store/1103020117</a>
85.	West Cycling Store	<a href="https://www.aliexpress.com/store/1102813418">https://www.aliexpress.com/store/1102813418</a>
86.	WZOM Store	<a href="https://www.aliexpress.com/store/1102486185">https://www.aliexpress.com/store/1102486185</a>
87.	Xiaolaotou Store	<a href="https://www.aliexpress.com/store/1101307780">https://www.aliexpress.com/store/1101307780</a>
88.	XiMei Sports Entertainment Store	<a href="https://www.aliexpress.com/store/1102900475">https://www.aliexpress.com/store/1102900475</a>
89.	XmDropshipping001 Store	<a href="https://www.aliexpress.com/store/1102961887">https://www.aliexpress.com/store/1102961887</a>
90.	YE TIAN Store	<a href="https://www.aliexpress.com/store/1102409242">https://www.aliexpress.com/store/1102409242</a>
91.	yixinyiyi01 Store	<a href="https://www.aliexpress.com/store/1101765275">https://www.aliexpress.com/store/1101765275</a>
92.	Yuze Global SAFETY PROTECTION Supplies Store	<a href="https://www.aliexpress.com/store/1101334429">https://www.aliexpress.com/store/1101334429</a>
93.	Yyayp Sports Store	<a href="https://www.aliexpress.com/store/1102983812">https://www.aliexpress.com/store/1102983812</a>

No.	Defendants	Defendants Online Marketplace(s)
94.	☆☆☆☆☆ Meditur	<a href="https://www.amazon.com/sp?seller=A1FKHJ5FDM12C0">https://www.amazon.com/sp?seller=A1FKHJ5FDM12C0</a>
95.	Acesaq	<a href="https://www.amazon.com/sp?seller=A2EE2LJ0799INE">https://www.amazon.com/sp?seller=A2EE2LJ0799INE</a>
96.	AEGWYNRR	<a href="https://www.amazon.com/sp?seller=A3D69IWIKMU1HX">https://www.amazon.com/sp?seller=A3D69IWIKMU1HX</a>
97.	BAYCENTER	<a href="https://www.amazon.com/sp?seller=A2CVC5BWP9WYTC">https://www.amazon.com/sp?seller=A2CVC5BWP9WYTC</a>
98.	BILAL YAZ	<a href="https://www.amazon.com/sp?seller=A1ZOIBEBI1TTC9">https://www.amazon.com/sp?seller=A1ZOIBEBI1TTC9</a>
99.	carilloa	<a href="https://www.amazon.com/sp?seller=A3QN0IY9GNEFP2">https://www.amazon.com/sp?seller=A3QN0IY9GNEFP2</a>
100.	chun wei mai tong bai huo dian	<a href="https://www.amazon.com/sp?seller=AZ4QU1MRN0BMM">https://www.amazon.com/sp?seller=AZ4QU1MRN0BMM</a>
101.	Cz-US	<a href="https://www.amazon.com/sp?seller=ATCGDQ7KTQCCZ">https://www.amazon.com/sp?seller=ATCGDQ7KTQCCZ</a>
102.	Doamlady	<a href="https://www.amazon.com/sp?seller=A1DTODV54YQPG1">https://www.amazon.com/sp?seller=A1DTODV54YQPG1</a>
103.	fuqingshisanshanzhenzhengbiyin baihuolingshouchaosh	<a href="https://www.amazon.com/sp?seller=AQOHEPQRWTGV3">https://www.amazon.com/sp?seller=AQOHEPQRWTGV3</a>
104.	gangke	<a href="https://www.amazon.com/sp?seller=A2V7QT5RINUHAV">https://www.amazon.com/sp?seller=A2V7QT5RINUHAV</a>
105.	gaoxiangdianpu	<a href="https://www.amazon.com/sp?seller=A342WT2U1JHRR2">https://www.amazon.com/sp?seller=A342WT2U1JHRR2</a>
106.	Georgegarcia	<a href="https://www.amazon.com/sp?seller=A38IKZCVTHK689">https://www.amazon.com/sp?seller=A38IKZCVTHK689</a>
107.	GeYiHan	<a href="https://www.amazon.com/sp?seller=A300JKDCRA6AUH">https://www.amazon.com/sp?seller=A300JKDCRA6AUH</a>
108.	gongpinlongn05	<a href="https://www.amazon.com/sp?seller=A3OLJYE3LWY4K">https://www.amazon.com/sp?seller=A3OLJYE3LWY4K</a>
109.	haikouqiongshanherubaihuodian	<a href="https://www.amazon.com/sp?seller=A3VPPCUYMT82G0">https://www.amazon.com/sp?seller=A3VPPCUYMT82G0</a>
110.	HuauYu Business	<a href="https://www.amazon.com/sp?seller=A1ZA8MTEYO0EHU">https://www.amazon.com/sp?seller=A1ZA8MTEYO0EHU</a>
111.	HUIHANSHP	<a href="https://www.amazon.com/sp?seller=A1AC0VSYI6VJWR">https://www.amazon.com/sp?seller=A1AC0VSYI6VJWR</a>
112.	Iron base trade (铁基贸易)	<a href="https://www.amazon.com/sp?seller=A3IKNDHEU97L2F">https://www.amazon.com/sp?seller=A3IKNDHEU97L2F</a>
113.	JFGDShop	<a href="https://www.amazon.com/sp?seller=ARIFBX3VIAOY4">https://www.amazon.com/sp?seller=ARIFBX3VIAOY4</a>
114.	JinJiSha	<a href="https://www.amazon.com/sp?seller=A38Y4WPUATWI2Y">https://www.amazon.com/sp?seller=A38Y4WPUATWI2Y</a>
115.	KAYANI STORE	<a href="https://www.amazon.com/sp?seller=A3BOUNBDKPGMOB">https://www.amazon.com/sp?seller=A3BOUNBDKPGMOB</a>
116.	LCJQ	<a href="https://www.amazon.com/sp?seller=A1MYH9S3RLC7AY">https://www.amazon.com/sp?seller=A1MYH9S3RLC7AY</a>
117.	lifevac store	<a href="https://www.amazon.com/sp?seller=A3HD15OXDBB5NI">https://www.amazon.com/sp?seller=A3HD15OXDBB5NI</a>
118.	Lily US Shop	<a href="https://www.amazon.com/sp?seller=A1G80GG8Z01IR6">https://www.amazon.com/sp?seller=A1G80GG8Z01IR6</a>
119.	LIYUFENG ool	<a href="https://www.amazon.com/sp?seller=AS0UXL151W34H">https://www.amazon.com/sp?seller=AS0UXL151W34H</a>
120.	M&Birch Inc	<a href="https://www.amazon.com/sp?seller=A1ULY6HDNOL59N">https://www.amazon.com/sp?seller=A1ULY6HDNOL59N</a>
121.	Madra Trd	<a href="https://www.amazon.com/sp?seller=A209HF95PR60AP">https://www.amazon.com/sp?seller=A209HF95PR60AP</a>
122.	mian xian jiao ling yi zhen bai huo dian	<a href="https://www.amazon.com/sp?seller=A3QXMTHQBRKUM3">https://www.amazon.com/sp?seller=A3QXMTHQBRKUM3</a>
123.	Monainc	<a href="https://www.amazon.com/sp?seller=AMB7SSATL5T3H">https://www.amazon.com/sp?seller=AMB7SSATL5T3H</a>
124.	Mranrae	<a href="https://www.amazon.com/sp?seller=A328ICJEHWJD4X">https://www.amazon.com/sp?seller=A328ICJEHWJD4X</a>



No.	Defendants	Defendants Online Marketplace(s)
125.	Papamen	<a href="https://www.amazon.com/sp?seller=A2RA1IC4NJZXZ2">https://www.amazon.com/sp?seller=A2RA1IC4NJZXZ2</a>
126.	Paris Lawrence	<a href="https://www.amazon.com/sp?seller=AX7LRWXW70PAS">https://www.amazon.com/sp?seller=AX7LRWXW70PAS</a>
127.	pie trade (派子贸易)	<a href="https://www.amazon.com/sp?seller=A1HJEWQ471NUTY">https://www.amazon.com/sp?seller=A1HJEWQ471NUTY</a>
128.	Punjwani's Store	<a href="https://www.amazon.com/sp?seller=A3OS5WTQCF586V">https://www.amazon.com/sp?seller=A3OS5WTQCF586V</a>
129.	quanliyifu-k	<a href="https://www.amazon.com/sp?seller=A32FKUUHL0TW0&amp;">https://www.amazon.com/sp?seller=A32FKUUHL0TW0&amp;</a>
130.	ruqunshangmaoyouxiangongsi	<a href="https://www.amazon.com/sp?seller=A26M4LU0FYUARV">https://www.amazon.com/sp?seller=A26M4LU0FYUARV</a>
131.	shanximengjinglanwenwangluoke jiyouxiangongsi	<a href="https://www.amazon.com/sp?seller=ACLPVSJG5APU4">https://www.amazon.com/sp?seller=ACLPVSJG5APU4</a>
132.	tengxiangyunlong	<a href="https://www.amazon.com/sp?seller=A3MFKG9TP9LELQ">https://www.amazon.com/sp?seller=A3MFKG9TP9LELQ</a>
133.	tengyaoshangmao123	<a href="https://www.amazon.com/sp?seller=A1121JTW0IGRJV">https://www.amazon.com/sp?seller=A1121JTW0IGRJV</a>
134.	TingDi E-commerce	<a href="https://www.amazon.com/sp?seller=A132NKVDNDJ3S8">https://www.amazon.com/sp?seller=A132NKVDNDJ3S8</a>
135.	Tu Zhixiang (途志祥)	<a href="https://www.amazon.com/sp?seller=A3QG4GFKU46UH7">https://www.amazon.com/sp?seller=A3QG4GFKU46UH7</a>
136.	USAdealer724H	<a href="https://www.amazon.com/sp?seller=A3QG4GFKU46UH7">https://www.amazon.com/sp?seller=A3QG4GFKU46UH7</a>
137.	WanShiHui	<a href="https://www.amazon.com/sp?seller=A32SYI9VSVXVJ1N">https://www.amazon.com/sp?seller=A32SYI9VSVXVJ1N</a>
138.	whshyqybdzswjyb	<a href="https://www.amazon.com/sp?seller=A3KX284HA8CFEH">https://www.amazon.com/sp?seller=A3KX284HA8CFEH</a>
139.	Wind blowing small feathers	<a href="https://www.amazon.com/sp?seller=AJ3XLKTD86KHJ">https://www.amazon.com/sp?seller=AJ3XLKTD86KHJ</a>
140.	worKKeep	<a href="https://www.amazon.com/sp?seller=A1IMZWGP0UZYPH">https://www.amazon.com/sp?seller=A1IMZWGP0UZYPH</a>
141.	XIANXIAOLANG hhj	<a href="https://www.amazon.com/sp?seller=AFG7U6VA5MXGW">https://www.amazon.com/sp?seller=AFG7U6VA5MXGW</a>
142.	xiuyingyuyinganbaihuodian	<a href="https://www.amazon.com/sp?seller=A3T6V9NAQRYNDQ">https://www.amazon.com/sp?seller=A3T6V9NAQRYNDQ</a>
143.	YiaYang	<a href="https://www.amazon.com/sp?seller=A14SE2TGX8KEFR">https://www.amazon.com/sp?seller=A14SE2TGX8KEFR</a>
144.	yongchunshengtaifeistore	<a href="https://www.amazon.com/sp?seller=A29Z0UAJWORCHI">https://www.amazon.com/sp?seller=A29Z0UAJWORCHI</a>
145.	zhangliyancaps	<a href="https://www.amazon.com/sp?seller=A1LIO6WQ9QS0E0">https://www.amazon.com/sp?seller=A1LIO6WQ9QS0E0</a>
146.	ZHUYAPENG ool	<a href="https://www.amazon.com/sp?seller=A2LPKR2ZTHB468">https://www.amazon.com/sp?seller=A2LPKR2ZTHB468</a>
147.	ZhuYuLianUS	<a href="https://www.amazon.com/sp?seller=A1Y2154R1JQWM6">https://www.amazon.com/sp?seller=A1Y2154R1JQWM6</a>
148.	abscohort	<a href="https://www.ebay.com/usr/abscohort">https://www.ebay.com/usr/abscohort</a>
149.	absnetwork	<a href="https://www.ebay.com/usr/absnetwork">https://www.ebay.com/usr/absnetwork</a>
150.	automotive2015	<a href="https://www.ebay.com/usr/automotive2015">https://www.ebay.com/usr/automotive2015</a>
151.	beadsofheaven	<a href="https://www.ebay.com/usr/beadsofheaven">https://www.ebay.com/usr/beadsofheaven</a>
152.	biaslm72	<a href="https://www.ebay.com/usr/biaslm72">https://www.ebay.com/usr/biaslm72</a>
153.	black*j43vja	<a href="https://www.ebay.com/usr/black*j43vja">https://www.ebay.com/usr/black*j43vja</a>
154.	chicnest	<a href="https://www.ebay.com/usr/chicnest">https://www.ebay.com/usr/chicnest</a>
155.	dear_blessing	<a href="https://www.ebay.com/usr/dear_blessing">https://www.ebay.com/usr/dear_blessing</a>

No.	Defendants	Defendants Online Marketplace(s)
156.	dewadas_store	<a href="https://www.ebay.com/usr/dewadas_store">https://www.ebay.com/usr/dewadas_store</a>
157.	evisio-81	<a href="https://www.ebay.com/usr/evisio-81">https://www.ebay.com/usr/evisio-81</a>
158.	fainad-94	<a href="https://www.ebay.com/usr/fainad-94">https://www.ebay.com/usr/fainad-94</a>
159.	faizmmuhamm_0	<a href="https://www.ebay.com/usr/faizmmuhamm_0">https://www.ebay.com/usr/faizmmuhamm_0</a>
160.	florida_emporium	<a href="https://www.ebay.com/usr/florida_emporium">https://www.ebay.com/usr/florida_emporium</a>
161.	frothees	<a href="https://www.ebay.com/usr/frothees">https://www.ebay.com/usr/frothees</a>
162.	gayanrban0	<a href="https://www.ebay.com/usr/gayanrban0">https://www.ebay.com/usr/gayanrban0</a>
163.	hukamkhan	<a href="https://www.ebay.com/usr/hukamkhan">https://www.ebay.com/usr/hukamkhan</a>
164.	jcc_int84a	<a href="https://www.ebay.com/usr/jcc_int84a">https://www.ebay.com/usr/jcc_int84a</a>
165.	justl75	<a href="https://www.ebay.com/usr/justl75">https://www.ebay.com/usr/justl75</a>
166.	k_mart2	<a href="https://www.ebay.com/usr/k_mart2">https://www.ebay.com/usr/k_mart2</a>
167.	kivi_tech33	<a href="https://www.ebay.com/usr/kivi_tech33">https://www.ebay.com/usr/kivi_tech33</a>
168.	kurta1	<a href="https://www.ebay.com/usr/kurta1">https://www.ebay.com/usr/kurta1</a>
169.	leebask	<a href="https://www.ebay.com/usr/leebask">https://www.ebay.com/usr/leebask</a>
170.	leihd001	<a href="https://www.ebay.com/usr/leihd001">https://www.ebay.com/usr/leihd001</a>
171.	mehrookhalil	<a href="https://www.ebay.com/usr/mehrookhalil">https://www.ebay.com/usr/mehrookhalil</a>
172.	mhoq19765	<a href="https://www.ebay.com/usr/mhoq19765">https://www.ebay.com/usr/mhoq19765</a>
173.	muhammaar45	<a href="https://www.ebay.com/usr/muhammaar45">https://www.ebay.com/usr/muhammaar45</a>
174.	muhammamuhamm0	<a href="https://www.ebay.com/usr/muhammamuhamm0">https://www.ebay.com/usr/muhammamuhamm0</a>
175.	muk.safe	<a href="https://www.ebay.com/usr/muk.safe">https://www.ebay.com/usr/muk.safe</a>
176.	nadah-1929	<a href="https://www.ebay.com/usr/nadah-1929">https://www.ebay.com/usr/nadah-1929</a>
177.	qiratsh30	<a href="https://www.ebay.com/usr/qiratsh30">https://www.ebay.com/usr/qiratsh30</a>
178.	qiuqiumi	<a href="https://www.ebay.com/usr/qiuqiumi">https://www.ebay.com/usr/qiuqiumi</a>
179.	shafa_4402	<a href="https://www.ebay.com/usr/shafa_4402">https://www.ebay.com/usr/shafa_4402</a>
180.	shakil1974	<a href="https://www.ebay.com/usr/shakil1974">https://www.ebay.com/usr/shakil1974</a>
181.	strike_fashion	<a href="https://www.ebay.com/usr/strike_fashion">https://www.ebay.com/usr/strike_fashion</a>
182.	sun*jv03	<a href="https://www.ebay.com/str/sunjv03">https://www.ebay.com/str/sunjv03</a>
183.	sunagbi-0	<a href="https://www.ebay.com/usr/sunagbi-0">https://www.ebay.com/usr/sunagbi-0</a>
184.	ttek_99	<a href="https://www.ebay.com/usr/ttek_99">https://www.ebay.com/usr/ttek_99</a>
185.	udanaan_63	<a href="https://www.ebay.com/usr/udanaan_63">https://www.ebay.com/usr/udanaan_63</a>
186.	us_autoparts_avenue	<a href="https://www.ebay.com/usr/us_autoparts_avenue">https://www.ebay.com/usr/us_autoparts_avenue</a>
187.	us_parts_arena	<a href="https://www.ebay.com/usr/us_parts_arena">https://www.ebay.com/usr/us_parts_arena</a>

<b>No.</b>	<b>Defendants</b>	<b>Defendants Online Marketplace(s)</b>
188.	wesh_real_303	<a href="https://www.ebay.com/usr/wesh_real_303">https://www.ebay.com/usr/wesh_real_303</a>
189.	yameen.birchwood	<a href="https://www.ebay.com/usr/yameen.birchwood">https://www.ebay.com/usr/yameen.birchwood</a>
190.	zohtan_60	<a href="https://www.ebay.com/usr/zohtan_60">https://www.ebay.com/usr/zohtan_60</a>
191.	allenforce0922	<a href="https://www.wish.com/merchant/5dbaebfe5069f82106f9049d">https://www.wish.com/merchant/5dbaebfe5069f82106f9049d</a>
192.	FGCC	<a href="https://www.wish.com/merchant/6421f9c9f17fa23924246c40">https://www.wish.com/merchant/6421f9c9f17fa23924246c40</a>
193.	liulining6822	<a href="https://www.wish.com/merchant/609de2c5941c2c30004633f8">https://www.wish.com/merchant/609de2c5941c2c30004633f8</a>
194.	life changing products	<a href="https://lcpshop.net/">https://lcpshop.net/</a>