

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

ORALDENT LTD.,

Plaintiff,

v.

THE PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON SCHEDULE "A",

Defendants.

Case No.: 1:20-cv-00304

Judge Gary Feinerman

Magistrate Judge Gabriel A. Fuentes

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff ORALDENT LTD.'s ("Plaintiff" or "ORALDENT") Motion for Entry of a Preliminary Injunction, and this Court having considered the evidence before it hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction in its entirety against the Defendants identified in Schedule A attached hereto (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. Specifically, Defendants are reaching out to do business with Illinois residents by operating one or more commercial, interactive Internet Stores through which Illinois residents can purchase products bearing infringing and/or counterfeit versions of Plaintiff's POWER FLOSS Trademark including U.S. Trademark Registration No. 4,747,510.

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 Plaintiff's

previously granted Motion for a Temporary Restraining Order establishes that Plaintiff has 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 trademark infringement because (1) the POWER FLOSS Trademark is 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 the POWER FLOSS Trademark, and (3) Defendants' use of the POWER FLOSS Trademark is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with Plaintiff's. Furthermore, Defendants' continued and unauthorized use of the POWER FLOSS Trademark irreparably harms Plaintiff through diminished goodwill and brand confidence, 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 while respecting the Defendants' right to sell, and customers' right to buy, products that do not infringe Plaintiff's trademark rights.

Accordingly, this Court orders that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, or under them be preliminarily enjoined and restrained from:
 - a. using Plaintiff's POWER FLOSS Trademark or any confusingly similar 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 POWER FLOSS product or not

authorized by Plaintiff to be sold in connection with Plaintiff's POWER FLOSS Trademark;

- b. passing off, inducing, or permitting others to sell or pass off any product as a genuine POWER FLOSS product or any other product produced by Plaintiff, that is not Plaintiff's or not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's POWER FLOSS Trademark;
 - 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 POWER FLOSS Trademark and damaging Plaintiff's goodwill;
 - e. knowingly manufacturing, 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 Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear Plaintiff's POWER FLOSS Trademark or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof;
2. Defendants shall provide to ORALDENT 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, including all know contact information and any and all associated e-mail addresses, of Defendants;

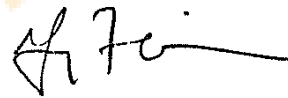
- b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplace Accounts and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplace Accounts;
3. Defendants shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets associated with sales from Product Listings identified on Schedule A until further ordered by this Court.
4. Any Third Party Providers, including eBay, Inc. ("eBay"), PayPal, Inc. ("PayPal"), Amazon Payments, Inc. ("Amazon"), Alipay US, Inc. and its entities ("Alipay"), Alibaba Group Holding Limited ("Alibaba"), Heguang International Limited or Dunhuang Group d/b/a DHGATE, DHGate.com, DHPORT, DHLINK and DHPAY ("DHGate") and Tophatter, Inc. ("Tophatter") shall, within five (5) 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 hereto, the e-mail addresses identified in Exhibit 2 to the Declaration of Richard Thomas, and any e-mail addresses provided for Defendants by third parties; and
 - b. Restrain and enjoin any such accounts or funds that are not U.S.-based from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

5. ContextLogic, Inc. (“WISH”) and its related companies and affiliates is subject only to the terms of this paragraph and all other paragraphs do not apply. Insofar as it has not already done so, WISH shall, within five business days of receipt of this Order, identify and restrain all funds that, as of February 4, 2020 at 9:00 a.m., were in the WISH accounts related to Defendants as identified on Schedule “A” hereto; WISH also shall provide Plaintiff’s counsel with an accounting of the total funds restrained and identify the financial account(s) which the restrained funds are related to. Such restraining of the funds and the disclosure of the related financial institution account information shall be made without notice to the account owners until after those accounts are restrained. No funds restrained by this Order shall be transferred or surrendered by WISH for any purpose (other than pursuant to a chargeback made pursuant to WISH’s security interest in the funds or as may be required by an order of a court or governmental agency) without the express authorization of this Court. The asset restraint will not operate on an ongoing basis, as the asset restraint shall apply only to assets described in this paragraph in WISH accounts up to February 4, 2020 at 9:00 a.m.
6. 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, this Order and other relevant documents on a website or by sending an e-mail to the e-mail addresses identified in Exhibit 2 of the Declaration of Richard Thomas 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 “chineon and all other Defendants identified in 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 Online Marketplace Accounts 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. Notwithstanding this provision, ordinary federal rules governing notice and service in civil cases shall apply to any Intervenor that the Court has permitted to appear.

7. Any Defendants that are subject to this Order, or Intervenor that the Court has permitted to appear, 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.
8. The \$10,000 bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

February 25, 2020



United States District Judge

SCHEDULE A

No.	DEFENDANTS
1	chineon
2	Isfang
3	New Fashion Market
4	Shenzhen HaMeng technology Co., Ltd.
5	365smile-mall
6	FY Trading
7	Top Men
8	Be the winner
9	IKAI BAG
10	jimshop
11	ringsmart
12	ulamore
13	Meizhene Shop
14	Trend Leader
15	guangzhoushizhimingmaoyiyouxiangongsi
16	SSHY
17	bowan Trade co., LTD.
18	tianfawang
19	toysdeal
20	Max's Store
21	dealsgo
22	Alex Wonderland
23	Han's city
24	onfine2015
25	Haida Technology
26	sunshineson
27	w_cute
28	leomall
29	chillscream
30	Odeum Electric Trade Ltd.
31	rongkangguojimaoyishenzhenyouxianzerengongsi
32	pingtengguojiyouxiangongsi
33	weeshop
34	pumio
35	Toppila
36	Chez Peter
37	Alalakh

38	focuskey
39	Golden Stone Flower
40	Be Diamonds
41	Caere
42	BuyInFun
43	asadexiaomaibu
44	KaiKai0901
45	Life_Care
46	supermariochan
47	kikichan
48	wang987321
49	Dingdang show
50	HiTomJerry
51	PanicBuying
52	hello-kull
53	protea
54	Vincent_Store
55	antique-look-supplies
56	Tabora
57	QProduct
58	hopezz
59	luckycharm668
60	E-BEST STORE
61	2017 Fashions
62	freedom boy
63	MIXED
64	booty shop
65	doraemonkiki
66	sugar-apple
67	INSOY
68	pingmamadepuzi
69	WUCHUYUN
70	nice decor
71	Atlantia
72	NewStone
73	Electronic Daily
74	cherishlife11
75	tangbabygirl
76	Science and technology in the hands of the world

77	Emilyping
78	marongze
79	chan_18
80	SHOP QQ
81	Pocket_mall
82	Ambler
83	Keqiong
84	mnpouruheartintot
85	Girl Jewelry
86	booblond
87	Hai_Tian
88	weshamazoon
89	B&J's shop
90	Life-Top 1
91	iueyu
92	Anxinzhijia
93	The wind of fashion
94	lafette-jewelry
95	xuyaqing
96	Caicai Dry goods shop
97	bestbird
98	DRESSUUP
99	Ohma
100	ilovesister
101	Jackie-jia
102	motorfansclub
103	Hongding Creative Life Hall
104	belang9239
105	lianxuxiezizhuanmai
106	notetoo
107	ruiertower
108	duck toy store
109	kk3z
110	zhulin88
111	Difunytch
112	jewelryhere
113	erdd
114	emilyandlily
115	xueshouwei

116	wuyan1314
117	yourswatch
118	IIcebeauty
119	jiandongshangdian
120	fashion_republic
121	Yongqing Store
122	luckytree365
123	littlefaries
124	angeleye
125	megaoffers
126	healthincenseltd
127	nicely
128	allshopnow
129	chengxiaoyi
130	amigazone
131	Shawn shop
132	Lianda
133	goldcambridge
134	cindydress
135	firm
136	accommodate
137	Miraff
138	HE's shop
139	Healthy Living Store
140	gaoxiongnanzhuang
141	chengfen
142	wholeseller
143	Fyling you heart
144	Svivi Store
145	AKLYSTORE
146	xurui trading
147	Jallis
148	weiyongchao
149	Efitty
150	heri
151	Fashion bloggers
152	niuxiaoxia0420
153	three
154	cqy7894

155	hcb1378
156	kuoaijr
157	icfuture
158	lilangda
159	great2buy
160	powercellers
161	ywcompeteyouth33
162	ElitMall
163	yunping
164	XXCXZ
165	MotionSave
166	kissbuyw
167	SHENZHENXIONGBOSHI
168	keeploveall
169	Tiffyline
170	HengTao
171	richie-antscatalogonlinestore.com
172	shengximei27
173	Family lucky store
174	todacusa
175	justepean
176	JCpProducts
177	Hi-techshoppers
178	yunskystore
179	minsdeal
180	December1222
181	WWW.OUTDOORS.LU
182	fujiejia
183	Highventures
184	muchmore2020
185	kolalame
186	thestoriesmy
187	tanxiaojiang
188	Srotean
189	WzzStore
190	yangm89
191	Belloerh
192	TTYTM Store
193	wangchengshop

194	LINLONGSHA25
195	barbara325
196	jituihaochi
197	Arccudda
198	laylayxinba
199	smallterhua
200	leileiliua
201	wendesa
202	quikmodern
203	Bruxeffes
204	xiyangdedian
205	uxuyangang
206	HFWEHXQFI
207	Lingenland
208	didadidaxiaodian
209	lhycc3
210	qiangweiguanweiyisheng
211	IYPL9FVNEI5
212	diandianqwer
213	chengaoqiang
214	happy woodpecker
214	woodpecker
215	liyan520
216	xingniankeshi
217	sirinanasell
218	ilirongrongshoping
219	jiwuxiu
220	yuanmeijia
221	qzuinn
222	wonor
223	caiyunzlau
224	Weiruidz
225	litanjian
226	DimaLai
227	wangwenjie0002
228	PQCFLAXMRW
229	Juicy Lover
230	tellmeyouneed
231	Cold Grassland

232	Better Life_Mall
233	Mily shop123
234	ZSL168store
235	Assesi Mell
236	SWsing
237	zhangcaiunggs
238	pehiut
239	chenqianjun321
240	dudf81g5
241	JunepQzHnLL
242	zhongzhongfang4655
243	Dufang555
244	guoyanli3415
245	asdwtu
246	gongli556
247	Ezcart
248	chenjin5467
249	SUAYEA11
250	YUAEON
251	stechllc
252	shengda168
253	Grlllc
254	Keeper12
255	TTinthehouse
256	Youngforever23
257	flippedDD66
258	crush45
259	wiyidingqingmei
260	reminisce45
261	Aurora67
262	bazinga66
263	serendipity333
264	rightnow888
265	08BUHKID
266	brunch123
267	millinon825
268	huangfeng96
269	neicead730
270	biigeoled580

271	YINGZI8765
272	lingling777
273	PInghua89
274	yuyuhuan928
275	chuanxin9
276	mamunie
277	Empanadas
278	Katherinky
279	Aiwan ELECTRIC TOY
280	Qianzhi Slip
281	Mingtong Ruan
282	fdgkb
283	1beasone
284	2016superstar
285	3dsoscan
286	akishop12
287	andwind
288	angeldoll111
289	areesoo
290	beanhold8
291	bessky_store
292	bifengsi-3
293	big-dady-deals
294	bigbigshop3
295	bulihuu8_2
296	bysell19
297	ciusdasstore2018
298	climbthefall
299	crowe-820
300	d1stop.thriftshop
301	deepbst
302	dentist-gentleman
303	downtownmall
304	enerang
305	enimae1
306	erashop
307	etnortoner
308	faidnoo0
309	farclear8

310	fenl-top
311	fmfalyce-1
312	fredmar_11
313	gadgethutretail
314	goodtops165
315	goodtopshop3
316	greentree199
317	guixianyi_0
318	guoli86
319	happycorner
320	hdjkhjdk1
321	him82serv
322	hobbyshop365
323	honsh_7
324	humengli1-8
325	hyylopo4
326	igeeda
327	it-manmo
328	jiamingli20174
329	jianfeng1698
330	jjj-37
331	julius.rac
332	jupiterbkk
333	kalyanchawla
334	keysma60
335	lcpt-12
336	leell6
337	legacystore
338	letsdiyshop
339	lijia233-0
340	likesneakers
341	lkavi19
342	luckystar520
343	madong119
344	meigoods
345	mohamebouimajjan0
346	moosado
347	ms2825shop
348	myshopping.777

349	newadvisor
350	noahime
351	npeshoppingcomplex
352	ok.style
353	olpaplau-0
354	overhalfsale
355	papaling88-0
356	promart016
357	pros840fan
358	qingyunlive8
359	qinqin891210_6
360	quayfashion
361	rise018
362	seveppap99
363	shareme20163
364	shoptongs
365	significantshop
366	smile_cc
367	smile1399
368	stylishmoment
369	su.xia
370	supertrademarketing
371	supplier019
372	sweetlovercompany
373	tanxingguo885
374	tomaspr
375	tonsee
376	top-plus020
377	toptopshop2
378	trendythings
379	universalstore2018
380	valuebuymall
381	vensixi
382	villagehead
383	white-cedar
384	windkiter
385	wontfindbetter
386	xi76299
387	xiaomengli2-9

388	xiaosi-0
389	xikuiqo4
390	xiuhuavo-4
391	yaloofashion
392	yavf5371
393	youidea
394	yuchengoo1
395	ywgate
396	zeroplus01
397	zhenwuwu_9
398	Huangdai
399	Ladyymm
400	Shanghai2008
401	Shanghai2010
402	Uprise
403	Cest
404	Idea
405	Vivian5168
406	Imgirl
407	Creatvalue
408	Parklondon
409	Sex-Lady
410	Skoqi
411	Niubility
412	Shen8400
413	Xmas4u
414	Kyne
415	Glass_smoke
416	Angelface
417	Zj593014149
418	Prettyrose
419	Guangzhou18
420	Kidtoysworld
421	Spinnertoys
422	Newsilkroad58
423	Fangxh
424	Llrncare
425	Healthfox
426	Mygogo

427	Shinyxiaowu
428	Millerjojo
429	Deese
430	Fan-Ling
431	TIAO TIAO GE
432	URBeauty
433	HGTTech
434	DDIGEjin
435	Gold Long-US
436	NotFoundDowntown
437	🌸MaiKaili🌸 ALL ITEM ON SALE
438	jfgjfgjf
439	LIUXIA2
440	Roy Sailsbury
441	PPSTAMP
442	Hua x
443	Shimigy
444	Foshin
445	Cup coverH
446	LiShiQuYuJinMenShiBu
447	GUTTEAR
448	YESHIN
449	virachinfinity
450	Cokil
451	IEnkidu
452	XIN ERTE
453	Kangsanli
454	Cliramer
455	everydayeasyinsmile
456	D.RoC flagship store
457	Stylish girl 666 Store
458	LORZIFEI Store
459	Ghostbond Store
460	BeautySweet Store
461	Elizabeth's Wonder Store
462	Anne_Shop
463	DaiGou Store
464	JUZIMAKEUP Store
465	pilaten1 Store

466	Artence Factory Store
467	bemz Store
468	HeiLou Store
469	Grasse Fragrances Store
470	Domestic classic Store
471	Trendy World Store
472	Meka Beauty
473	classicDomestic
474	Golddessa club remix Store
475	kai yunly online Store
476	MoonBiffy Store
477	Jane@ Store
478	Love Beautiful Paradise Store
479	FANTASY MAKEUP Store
480	Shop2802162 Store
481	Tonke Digital Store
482	Shiny&Beauty1 Store
483	The 3th world Store
484	Stylish Bueaty Store
485	Sexy Baby Makeup Store
486	Beautifully Store
487	Vicky Dropshipping Store
488	iCosmetic Store
489	Illuminate your beautiful Store
490	Women Beautiful Cottage Store
491	FTF Store
492	PrettyGirl 520 Store
493	Beautiful Factory Store
494	BEAUTEOUSW Store
495	Trendy Glasses Store
496	QUEEON Store
497	Electric shopping center Store
498	Romantic L&Y Store
499	Near Me Makeup Store
500	Handsome Store Store
501	HomeAppliances Dropshipping Store
502	Simstyle House Appliances Store
503	7XSM Store
504	lokainail Store

505	Convenience Appliance Store Store
506	Come to Store
507	Appliance center Store
508	CcOo Appliance Store Store
509	Newer Beautygirl Store
510	LanLou Store
511	USDH beautygirl Store
512	Intelligent Electric Appliance Store
513	Intelligent Life Appliances Store
514	Newday Store
515	THE FIRST GODDESS Store
516	Oral Hygiene Equipment Store
517	Shop3674027 Store
518	Niu Bi Store
519	Shop3684047 Store
520	Cosmetology Healthy Store
521	YELLOWQ1 Store
522	YELLOWQ Store
523	Lifestyle Store
524	Personal Care Appliances Store
525	Enjoy Cosmetic Store
526	DIRIDA Store
527	Fantasy Baby 0818 Store
528	Beautiful Fairy123 Store
529	My Funny Life Store
530	MengQi Appliance Store
531	For The Life Store
532	Improve life Store
533	Friendly Store
534	Shop4434154 Store
535	Oh Goddess Store
536	Shop4498087 Store
537	Shop4499048 Store
538	AI H0me Appliances Store
539	Kayla&Teresa Store
540	Global HomeAppliances Store
541	IF U Store
542	Beautiful Forever123 Store
543	FLYTONN PersonalCare Store

544	unbelievable Store
545	Shop4654115 Store
546	Shop4657006 Store
547	Shop4673059 Store
548	Beautiful Healthy life Store
549	Shop4677023 Store
550	FANRUIMAOYI Store
551	Kris Women Makeup Dropshipping Store
552	Skyy Store
553	your cosmetic Store
554	Xerath Store
555	Eighth Store
556	insbeautys Store
557	E-Zoo Store
558	TTS Makeup Store
559	Guine's make-up Store
560	Kerrylife Store
561	MiMall Store
562	gerrng Store
563	Artence Official Store
564	Good Life First Store
565	Global Outlet Store
566	Shop5075487 Store
567	airlife store Store
568	B16688 Store
569	Shop5151005 Store
570	Beautiful Angels Store
571	Shop5273029 Store
572	Cosinion Store
573	Shop5427287 Store
574	Shop5433236 Store
575	Shenzhen Balinda Technology Co., Ltd.
576	Ningbo E-Fitness Industry & Trade Co., Ltd.
577	Hebei Minkang Biological Technology Co., Ltd.
578	Fuzhou YAYISHENG Oral Technology Co., Ltd.
579	Suzhou Influence Electronic Technology Co., Ltd.
580	Guangzhou Jingshen Cosmetic Co., Ltd.
581	Shenzhen Piemens Technology Co., Ltd.
582	Quanshangbuy (Shenzhen) Technology Co., Ltd.

583	Wenzhou Rotage Import & Export Co., Ltd.
584	Ningbo Yinzhou Rozi Trading Co., Ltd.
585	Ningbo Safebond International Trade Co., Ltd.
586	Zhengzhou Smile Biotech Co., Ltd.
587	Shenzhen SXB Electronic Co., Ltd.
588	Shenzhen Honglida E-Commerce Co., Ltd.
589	Shenzhen Lianshuoda Technology Co., Ltd.
590	Shenzhen Twosuccess Electronic Co., Ltd.
591	Yiwu Yourui Daily Necessities Co., Ltd.
592	Yangzhou E.S. Toothbrush Co., Ltd.

