

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

UNIVERSAL MUSIC GmbH d/b/a BRAVADO,

Plaintiff,

v.

AMESION85 et al.,

Defendants.

Case No. 20-cv-4157

Judge Gary S. Feinerman

**PRELIMINARY INJUNCTION ORDER**

THIS CAUSE being before the Court on UNIVERSAL MUSIC GmbH d/b/a BRAVADO's Motion for 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 Volbeat Trademarks (the "Volbeat Products").

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 made a *prima facie* showing of trademark infringement because (1) the Volbeat Trademark is a distinctive mark and registered with the U.S. Patent and Trademark Office, (2) Defendants are not licensed or authorized to use Volbeat Trademark, and (3) Defendants' use of the Volbeat Trademark is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with UNIVERSAL MUSIC GmbH d/b/a BRAVADO. Furthermore, Defendants' continued and unauthorized use of the Volbeat 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.

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 Plaintiff's Volbeat 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 Volbeat Products or not authorized by Plaintiff to be sold in connection with Plaintiff's Volbeat Trademark;

- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Volbeat Products or 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 Volbeat 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 Volbeat Trademark and damaging Plaintiff's goodwill;
- e. otherwise competing unfairly with Plaintiff 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 Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear Plaintiff's Volbeat Trademark or any confusingly similar 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 (now or in the future) Counterfeit Volbeat 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 Plaintiff's Volbeat Trademark or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof that is not a genuine Volbeat Products or not authorized by Plaintiff to be sold in connection with Plaintiff's Volbeat Trademark.
2. Each Defendant, within fourteen (14) days after receiving notice of this Order, shall serve upon Plaintiff a written report under oath providing: (a) their true name and physical address, (b) all websites and online marketplace accounts on any platform that it owns and/or operate (c) their financial accounts, including all DHgate accounts, and (d) the steps taken by that Defendant to comply with paragraph 1, a through h, above.
3. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afiliat Limited, CentralNic, Nominet, and the Public Interest Registry, within three (3) business days of receipt of this Order or prior to expiration of this Order, whichever date shall occur first, shall, at Plaintiff's choosing:
  - a. unlock and change the registrar of record for the Defendant Domain Names to a registrar of Plaintiff'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 Plaintiff'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 iOffer and DHgate, 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 Volbeat Trademark, including any accounts associated with the Defendants listed in 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 Volbeat Trademark; and
  - c. take all steps necessary to prevent links to the Defendant Domain Names identified in Schedule A from displaying in search results. This includes, but is 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 DHgate, 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 DHgate, 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 Plaintiff 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,

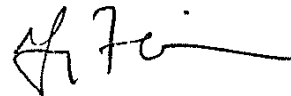
DHgate and Western Union, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

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. DHgate 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 DHgate accounts connected to the information listed in Schedule A hereto; and
  - b. Restrain and enjoin any such accounts or funds that are China or Hong Kong based from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
8. Plaintiff may provide notice of these proceedings to Defendants, including notice of any future hearings and service of process pursuant to Fed.R.Civ.P. 4(f)(3), by electronically publishing a link to the Amended Complaint, this Order and other relevant documents on a website to which the Defendant Domain Names are transferred to Plaintiff's control will redirect, or by sending an e-mail to the e-mail addresses identified in Schedule A hereto; and any e-mail addresses provided for Defendants by third parties accompanied by a link to the website where the above-identified documents are located. The Clerk of Court is directed to issue a single original summons in the name of "AMESION85 and all other Defendants identified in Amended 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 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.

9. Plaintiff's Schedule A to the Amended Complaint, and the TRO are unsealed.
10. 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.
11. Plaintiff shall post a bond with the Court within one week of entry of this order.

Dated: 8/25/20



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U.S. District Court Judge



**SCHEDULE A**

<b>No.</b>	<b>Defendant Name / Alias</b>
1	amesion85
2	yubin11
3	yubin1
4	yuxin0002
5	funnyteesstore
6	lijian58
7	pingguo5
8	jie033
9	lijian066
10	happycup
11	hx2093673809
12	lijian70
13	yubin10
14	gali2
15	jie45
16	futurename
17	shangshenglingshig
18	caisemao1
19	gali1
20	jie038
21	wenlong1
22	jie032
23	lijian034
24	amesion051jl
25	linnan007
26	jie039
27	lijian046
28	fishclub
29	tigerball
30	linnan00002
31	zhangjingxin27
32	blueberry15
33	torymi
34	yoursuger
35	A76538300
36	adidascup
37	adidastshirt
38	ahourstore

39	allin1cases
40	allweshop
41	alturasthreads
42	amazingdown
43	amesion02
44	amesion09ljl
45	amesion2409
46	amesion2508
47	amesion30
48	amesion41
49	amesion46
50	amesion47
51	amesion59
52	amesion60
53	amesion82
54	amesion86
55	amesion92
56	Angeltshirt
57	Armanitshirt
58	baishi1
59	baishi10
60	baishi2
61	baishi5
62	banbostore
63	banwanyue2
64	bincheng1
65	bincheng2
66	bincheng5
67	bincheng6
68	bincheng7
69	bincheng8
70	bincheng9
71	biyue1
72	biyue4
73	biyue7
74	biyue8
75	biyue9
76	brandsupply
77	burberrytshirt
78	caisemao08
79	chaneltshirts

80	Classiclobber
81	clothing_dealss
82	cloudtshirt
83	colourfashion
84	conbostore
85	Dappachappy
86	ddgxx
87	deepseastation
88	demierrr
89	designlife
90	diortshirts
91	dragonballtshirt
92	eatipstore
93	fanyumaoyi02
94	fanyumaoyi03
95	fanyumaoyi06
96	fanyumaoyi07
97	fanyumaoyi09
98	fanyumaoyi10
99	Fayshowstore
100	fgtt119
101	fightershop
102	fittingstore
103	fourcup
104	free_will_shirts
105	funnybonetees
106	funnymentee
107	funnytee
108	funnytshirt
109	futuretshirts
110	gali4
111	gali5
112	gali7
113	gali8
114	gaobei06
115	gaobei07
116	Geshstore
117	gooddonnedmyg
118	goodyuns
119	gucciteeshirt
120	guccitshirts

121	hahaonecup
122	hepsiburada
123	Houmian
124	italynest
125	jie030
126	jie037
127	jie2
128	jie21
129	jie4
130	jie40
131	jie42
132	jie46
133	jie51
134	jie53
135	jie56
136	jie58
137	jie59
138	jie9
139	jingyan002
140	jingyan004
141	jingyan006
142	jingyan008
143	jingyan009
144	ktmsky
145	ktmtshirt
146	lanshiren5
147	leektg
148	lifeiscrap
149	liguo0029
150	liguo0035
151	liguo0036
152	liguo0042
153	liguo0048
154	liguo0054
155	liguo0059
156	lijain91
157	lijian035
158	lijian036
159	lijian04
160	lijian044
161	lijian047

162	lijian062
163	lijian063
164	lijian069
165	lijian17
166	lijian18
167	lijian53
168	lijian56
169	lijian59
170	lijian73
171	lijian74
172	lijian76
173	lijian84
174	lijian85
175	lijian86
176	lijian87
177	linnan00004
178	linnan00009
179	linnan0001
180	linnan0002
181	linnan0007
182	linnan001
183	linnan0010
184	linnan005
185	ll_shop
186	lm31tshirt
187	lm32tshirt
188	Lontimestore
189	luxuryoutfit
190	lvtee
191	lvtshirts
192	margat
193	mayshowstore
194	menstshirts44
195	mhostore
196	micky_tees
197	mochostore
198	Moilystore
199	Mvptshirt
200	nikecup
201	nikktm
202	peng02

203	peng04
204	Pepitaprint
205	pianetaoutlet
206	Pingcup
207	pingguo1
208	pingguo2
209	Pingguo4
210	pingguo6
211	pingguo8
212	pingguo99
213	pradateeshirt
214	pradatshirts
215	Printee
216	printshirts
217	qz106152964
218	Qz1409088365
219	qz1538381382
220	qz2878193779
221	qz3183389644
222	qz710418820
223	restdaystore
224	revolvertees
225	Shirt Club
226	shirtmall
227	shirtquarters
228	shirts164d1
229	shitan10
230	Shitan8
231	Shop4you2018
232	sillyboyshirts
233	societhirty
234	spidermantees
235	spreadsshirt
236	supertoyou
237	tee_spirit
238	teegood
239	tees1988
240	teespringsshirtee
241	topclassaa
242	tshirtkidd
243	twicecup

244	upcup
245	valentinoteeshirt
246	valentinotshirts
247	versacetshirt
248	vistaprinthirt
249	wayslestore
250	wellcup
251	xm23tshirt
252	xsy17tshirt
253	Xsy18tshirt
254	xsy19tshirt
255	yabsera
256	yage_shop
257	yellowcup
258	yg02tshirt
259	yg03tshirt
260	yg05tshirt
261	yg06tshirt
262	yg08tshirt
263	iyunwat
264	yohistore
265	yubin01
266	yubin02
267	yubin03
268	yubin08
269	yubin09
270	yunwa01
271	yunwa02
272	yuxin0001
273	yuxin0003
274	yuxin0006
275	yuxin0008
276	yuxin0010
277	yuxin002
278	yuxin005
279	yuxin007
280	yuxin008
281	yuxin07
282	yuxin10
283	zhangjingxin
284	zhangjingxin01

285	zhangjingxin04
286	zhangjingxin05
287	zhangjingxin08
288	zhangjingxin2
289	zhangjingxin25
290	zhangjingxin35
291	zy88stees
292	arrowhead
293	bmw8090
294	lazsell
295	shinning168

<b>No.</b>	<b>Defendants Online Marketplace</b>
1	<a href="https://www.dhgate.com/wholesale/products/ff80808165c7e5cf0165e6fe12bd6618.html">https://www.dhgate.com/wholesale/products/ff80808165c7e5cf0165e6fe12bd6618.html</a>
2	<a href="https://www.dhgate.com/wholesale/products/ff8080816773e12001677905764f48a6.html">https://www.dhgate.com/wholesale/products/ff8080816773e12001677905764f48a6.html</a>
3	<a href="https://www.dhgate.com/wholesale/products/ff80808166f8e8ea01675559886e1d78.html">https://www.dhgate.com/wholesale/products/ff80808166f8e8ea01675559886e1d78.html</a>
4	<a href="https://www.dhgate.com/wholesale/products/ff80808166c6073e0166d7d238485b92.html">https://www.dhgate.com/wholesale/products/ff80808166c6073e0166d7d238485b92.html</a>
5	<a href="https://www.dhgate.com/store/21117472">https://www.dhgate.com/store/21117472</a>
6	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d15f01667c433c8e1879.html">https://www.dhgate.com/wholesale/products/ff80808165e7d15f01667c433c8e1879.html</a>
7	<a href="https://www.dhgate.com/store/21082899">https://www.dhgate.com/store/21082899</a>
8	<a href="https://www.dhgate.com/store/21182599">https://www.dhgate.com/store/21182599</a>
9	<a href="https://www.dhgate.com/wholesale/products/ff80808166c4b4770166c9a45dfa3e67.html">https://www.dhgate.com/wholesale/products/ff80808166c4b4770166c9a45dfa3e67.html</a>
10	<a href="https://www.dhgate.com/store/21128755">https://www.dhgate.com/store/21128755</a>
11	<a href="https://www.dhgate.com/store/21109235">https://www.dhgate.com/store/21109235</a>
12	<a href="https://www.dhgate.com/wholesale/products/ff80808166f8ea4d0166fbb11a04157a.html">https://www.dhgate.com/wholesale/products/ff80808166f8ea4d0166fbb11a04157a.html</a>
13	<a href="https://www.dhgate.com/wholesale/products/ff8080816773e119016778f7648847f8.html">https://www.dhgate.com/wholesale/products/ff8080816773e119016778f7648847f8.html</a>
14	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d28101667b0a30507704.html">https://www.dhgate.com/wholesale/products/ff80808165e7d28101667b0a30507704.html</a>
15	<a href="https://www.dhgate.com/wholesale/products/ff808081678936440167cc43904b6d3f.html">https://www.dhgate.com/wholesale/products/ff808081678936440167cc43904b6d3f.html</a>
16	<a href="https://www.dhgate.com/wholesale/products/ff8080816779800e01677cd6b7392648.html">https://www.dhgate.com/wholesale/products/ff8080816779800e01677cd6b7392648.html</a>



17	<a href="https://www.dhgate.com/store/20549067">https://www.dhgate.com/store/20549067</a>
18	<a href="https://www.dhgate.com/store/21087922">https://www.dhgate.com/store/21087922</a>
19	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d210016639410d762fde.html">https://www.dhgate.com/wholesale/products/ff80808165e7d210016639410d762fde.html</a>
20	<a href="https://www.dhgate.com/wholesale/products/ff80808167737d65016773d51922038b.html">https://www.dhgate.com/wholesale/products/ff80808167737d65016773d51922038b.html</a>
21	<a href="https://www.dhgate.com/store/20685774">https://www.dhgate.com/store/20685774</a>
22	<a href="https://www.dhgate.com/wholesale/products/ff80808166f8ea540167737a0c7d1443.html">https://www.dhgate.com/wholesale/products/ff80808166f8ea540167737a0c7d1443.html</a>
23	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d281016675a6bd8f2dba.html">https://www.dhgate.com/wholesale/products/ff80808165e7d281016675a6bd8f2dba.html</a>
24	<a href="https://www.dhgate.com/wholesale/products/ff808081657a746b0165a8c3a4d7553f.html">https://www.dhgate.com/wholesale/products/ff808081657a746b0165a8c3a4d7553f.html</a>
25	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d168016687284e0c2ba0.html">https://www.dhgate.com/wholesale/products/ff80808165e7d168016687284e0c2ba0.html</a>
26	<a href="https://www.dhgate.com/wholesale/products/ff8080816779800c01677d3468192f5a.html">https://www.dhgate.com/wholesale/products/ff8080816779800c01677d3468192f5a.html</a>
27	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d167016675b7e7ab3aaa.html">https://www.dhgate.com/wholesale/products/ff80808165e7d167016675b7e7ab3aaa.html</a>
28	<a href="https://www.dhgate.com/store/21185153">https://www.dhgate.com/store/21185153</a>
29	<a href="https://www.dhgate.com/store/21160490">https://www.dhgate.com/store/21160490</a>
30	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d27b0166874e90d7215a.html">https://www.dhgate.com/wholesale/products/ff80808165e7d27b0166874e90d7215a.html</a>
31	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d2100166763fbe55398b.html">https://www.dhgate.com/wholesale/products/ff80808165e7d2100166763fbe55398b.html</a>
32	<a href="https://www.dhgate.com/store/20325430">https://www.dhgate.com/store/20325430</a>
33	<a href="https://www.dhgate.com/store/21379828">https://www.dhgate.com/store/21379828</a>
34	<a href="https://www.dhgate.com/store/20958869">https://www.dhgate.com/store/20958869</a>
35	<a href="https://www.dhgate.com/wholesale/products/ff8080816ad41e5b016b2b6401c644e3.html">https://www.dhgate.com/wholesale/products/ff8080816ad41e5b016b2b6401c644e3.html</a>
36	<a href="https://www.dhgate.com/store/21133976">https://www.dhgate.com/store/21133976</a>
37	<a href="https://www.dhgate.com/store/21126685">https://www.dhgate.com/store/21126685</a>
38	<a href="https://www.dhgate.com/store/21148852">https://www.dhgate.com/store/21148852</a>
39	<a href="https://www.dhgate.com/store/21121441">https://www.dhgate.com/store/21121441</a>
40	<a href="https://www.dhgate.com/store/21299348">https://www.dhgate.com/store/21299348</a>
41	<a href="https://www.dhgate.com/store/21134630">https://www.dhgate.com/store/21134630</a>
42	<a href="https://www.dhgate.com/store/21129511">https://www.dhgate.com/store/21129511</a>
43	<a href="https://www.dhgate.com/wholesale/products/ff80808164eaa31f016521c3b5bb291c.html">https://www.dhgate.com/wholesale/products/ff80808164eaa31f016521c3b5bb291c.html</a>
44	<a href="https://www.dhgate.com/wholesale/products/ff808081657b25300165ae6db629121d.html">https://www.dhgate.com/wholesale/products/ff808081657b25300165ae6db629121d.html</a>
45	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d27b0165eaac0fb11ab8.html">https://www.dhgate.com/wholesale/products/ff80808165e7d27b0165eaac0fb11ab8.html</a>

46	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d1640165eab69dff1c32.html">https://www.dhgate.com/wholesale/products/ff80808165e7d1640165eab69dff1c32.html</a>
47	<a href="https://www.dhgate.com/wholesale/products/ff80808165c7e5d90165db6774297139.html">https://www.dhgate.com/wholesale/products/ff80808165c7e5d90165db6774297139.html</a>
48	<a href="https://www.dhgate.com/wholesale/products/ff80808165c7e4c60165e554235b436a.html">https://www.dhgate.com/wholesale/products/ff80808165c7e4c60165e554235b436a.html</a>
49	<a href="https://www.dhgate.com/wholesale/products/ff80808165c7e5d60165e55bfef24511.html">https://www.dhgate.com/wholesale/products/ff80808165c7e5d60165e55bfef24511.html</a>
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