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

POW! ENTERTAINMENT, LLC,	)
Plaintiff,	) Case No. 20-cv-4464
v.	) Judge: Harry D. Leinenweber
THE INDIVIDUALS, CORPORATIONS,	)
LIMITED LIABILITY COMPANIES,	
PARTNERSHIPS AND UNINCORPORATED	
ASSOCIATIONS IDENTIFIED ON SCHEDULE	)
A, HERETO,	)
	)
Defendants.	)

## PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff POW! ENTERTAINMENT, LLC's ("Plaintiff" or "STAN LEE") 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 STAN LEE Trademarks including U.S. Trademark Registration Nos. 5,875,319; 5,880,988; 5,880,991 and 5,886,378 for word mark "STAN LEE"; No. 5,670,515 for the Design mark of

STAN LEE's signature; No. 3,357,243; 5,674,588 and 5,674,595 for the word mark "STAN LEE PRESENTS; and No. 5,598,858 for the word mark "THE STAN LEE FOUNDATION".

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 STAN LEE Trademarks are distinctive marks and registered with the U.S. Patent and Trademark Office on the Principal Register, (2) Defendants are not licensed or authorized to use the STAN LEE Trademarks, and (3) Defendants' use of the STAN LEE Trademarks 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 STAN LEE Trademarks 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 STAN LEE Trademarks 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 STAN LEE product or not authorized by Plaintiff to be sold in connection with Plaintiff's STAN LEE Trademarks;
  - b. passing off, inducing, or permitting others to sell or pass off any product as a genuine STAN LEE 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 STAN LEE Trademarks;
  - 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 STAN LEE Trademarks 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

- STAN LEE Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof;
- 2. The domain name registries for the Defendant Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias 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, 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, eBay, PayPal, 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
     STAN LEE Trademarks, 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 STAN LEE Trademarks; and

- c. take all steps necessary to prevent links to the Defendant Domain Names identified in 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, eBay, PayPal, 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 eBay, PayPal, DHgate, 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 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, eBay, PayPal, DHgate, 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 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 eBay, PayPal, DHgate, web hosts, sponsored search engine or ad-word providers, credit cards, banks, merchant account providers, third party processors and other payment processing service providers, Internet search engines such as Google, Bing, and Yahoo, and domain name registrars, including but not limited to, GoDaddy, Name.com, PDR, and Namecheap, (collectively, the "Third Party Providers") shall, within ten (10) business days of receipt of such notice, provide to

Plaintiff 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 known contact information and any and all associated e-mail addresses, of Defendants, their agents, servants, employees, confederates, and attorneys;
- 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, 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, and attorneys, 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, eBay, PayPal, DHgate, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
- 7. Third Party Providers with actual notice of this Order shall, within ten (10) business

days of receipt of such notice:

- a. remove Product Listings identified on Schedule A from any website under that
   Third Party Provider's control, to the extent not previously removed;
- b. remove advertisements for Product Listings identified on Schedule A from any website under that Third Party Provider's control; and
- remove links to the Defendant Domain Names from any search index under that
   Third-Party Provider's control.
- 8. Defendants and Third-Party Providers 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.
- 9. eBay shall, within seven (7) 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
     eBay 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.
- 10. PayPal shall, within seven (7) 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
     Amazon 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.
- 11. DHgate shall, within seven (7) 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.
- 12. 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 to which the Defendant Domain Names which are transferred to Plaintiff's control will redirect, or by sending an e-mail to the e-mail addresses identified in Exhibit 2 of the Declaration of Gill Champion 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 "AMESION03 and all other Defendants identified in the Complaint" that shall apply to all Defendants. The combination of providing notice via electronic publication or e-mail, along with any notice that Defendants receive from domain name registrars and payment processors, shall constitute notice

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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 Intervenors that the Court has permitted to appear.

13. Any Defendants that are subject to this Order, or Intervenors 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.

14. 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.

Dated: 9/1/2020

Harry D. Leinenweber

U.S. District Court Judge

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## SCHEDULE A

No.	Defendant Name / Alias
1	Chutoral
2	CQBM
3	Gaozs
4	Heare
5	Qifenghuang
6	Zhaohua
7	.POP. Store
8	A Song of Beautiful Healthy Store
9	aimaimai Store
10	Angel-Paradise
11	Anime Factory Branch Store
12	Anime Model Store
13	avaton Store
14	bestwishes Store
15	Block Toy Wholesales Store
16	California Peach Toy Store
17	Child Loving Store
18	Collect Toy Store
19	Daakoom Store
20	dbzop Store
21	Dongguan Songli Plastics Industry Co., Ltd.
22	DR.TONG 0809 Professional Store
23	DT-minifigures Store
24	Fishbones FigureToy Store
25	Guangzhou Guangchen Trading Co., Ltd.
26	Guangzhou Kairong Industrial Co., Ltd.
27	hao1688 Store
28	Hero Block Store
29	Husp Store
30	JHACG FigureToy Store
31	Kakali Toy Store
32	LK Toy Store
33	LOL Dolls Toy Store
34	MANYINGYUAN Toy Store
35	Megao Block Store
36	Megao Minifigs Blocks Store
37	Megao N1 Bricks Store
38	Minele Bricks Blocks Dropshipping Store

39	Minifigures Blocks Store
40	Minifigures Club Store
41	Minifigures Wholesales Store
42	Moli Minifigures Store
43	MrPea Store
44	Newfound Toy Store
45	Peppa Toy Store
46	Phenomenal baby Store
47	Playful World Store
48	Pop Officially Licensed Store
49	PopLife ENT Store
50	POPPY Store
51	PuWei Toy Store
52	Shenzhen SRX Animation Creation Co., Ltd.
53	Shop123 Store
54	Shop2945133 Store
55	Shop3013016 Store
56	Shop3838002 Store
57	Shop4799021 Store
58	Shop5014016 Store
59	Shop5106130 Store
60	Shop5124024 Store
61	Shop5126040 Store
62	Shop5259135 Store
63	Shop5374049 Store
64	Sivir Store
65	StandStore Store
66	Starwar Store
67	superChoGath Store
68	tmgt Minifigs Store
69	Tongtong Funny Toy Store
70	Toy Hobby Store
71	Toys World Store
72	TTHAOKAI Store
73	Twitch Store
74	Two little naughty elfs Store
75	WARS MARVELS official-Ali Store
76	Win-win toys
77	WM Figures Store
78	World Minifigs Bricks Store
79	World Minifigures Store

80	Yiwu Animestar E-Commerce Firm
81	Encontrar Children's Store
82	Superstyle F ahion Store
83	Abby Happy Store
84	biesukaohaibushidream Store
85	HANSAM Store
86	Tophatker
87	fdighdlfj
88	Heidegger's
89	JGCai
90	Max's Brother
91	RSGEOIJOW
92	xianshigaoxinquhuizhixintushuxiaoshoubu
93	allhat Store
94	ang07 Store
95	angmaoyi05 Store
96	Anring Store
97	Baby Teeshow Store
98	Binggo Store
99	Children Toptees Store
100	Crazytshirts Store
101	Customize for you Store
102	datong09 Store
103	Dear11 Store
104	Dear15 Store
105	gas monkey men shirt Store
106	HX Factory No.2 Store
107	Janormei Store
108	JollyPeach Store
109	Men's Boutique Store
110	MH Anime Store
111	Ming Store
112	Pattern printed clothes Store
113	PTDDYI Store
114	PyHenPH Tshirt Authorized Store
115	SexeMara DeliciousTee Store
116	Shop3242048 Store
117	Shop3243051 Store
118	Shop3984002 Store
119	Shop4591005 Store
120	Shop4599020 Store

122         Shop4682020 Store           123         Shop4827007 Store           124         Shop4994214 Store           125         Shop4994277 Store           127         Shop4997310 Store           128         Shop4997518 Store           129         Shop5000299 Store           130         Shop5004399 Store           131         Shop5019123 Store           132         Shop5026133 Store           133         Shop5030097 Store           134         Shop5046103 Store           135         Shop5372125 Store           136         Stylevike Tees Store           137         teeheart Official Store           138         TeeLee Store           139         wway Store           140         FaiCai           141         fgbdjsfbs           142         LQ art house           143         New Dream Art           144         starrymoon-long           145         2019 Poster Store           146         BLINGIRD Muzu Art Store           147         BOB poster Store           148         brave battle iCanvas Painting Store           150         DXLYMYU Official Store           151		
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172	JinHuaShengChengBeiJingShangMaoYouXianGongSi
173	Juewu
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177	cn1513416123 Store
178	ThiKin Design Dropshipping Store
179	asdsxzdfcxf
180	EVE BLAKE
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192	Unyiqun
193	Bess Phone Store
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195	Cool Art Store
196	MaiYaCase Store
197	Mix Phone Case Technology Co.,Ltd
198	Shop4994197 Store
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209	Give me a Call Store
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217	Custom Decorative Doormats
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15 1	https://www.aliexpress.com/store/4474142
15 2	https://icanvas.aliexpress.com/store/4684034
15 3	https://leadingtenphyprintplus.aliexpress.com/store/3747008
15 4	https://liveustory.aliexpress.com/store/2944226
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19 3	https://www.aliexpress.com/store/5005328
19 4	https://www.aliexpress.com/store/5093110
19 5	https://www.aliexpress.com/store/1804263
19 6	https://www.aliexpress.com/store/2340267
19 7	https://www.aliexpress.com/store/1907325
19	https://www.aliexpress.com/store/4994197
19	https://www.aliexpress.com/store/5380250
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20 6	https://www.aliexpress.com/store/4387087
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21 2	https://www.amazon.com/sp?_encoding=UTF8&asin=B07WSTGVT4&isAmazonFulfilled=0&isCBA=&marketplaceID=ATVPDKIKX0DER&orderID=&seller=A1ESCS5IWPABCP&tab=&vasStoreID=
21 3	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA=&marketplaceID=ATVPDKIKX0DER&orderID=&seller=A8B00ZTGDV53Z&tab=&vasStoreID=
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21 7	https://www.amazon.com/gp/aag/main/ref=olp_merch_name_1/136-2674094-1886134?ie=UTF8&asin=B077ZNJX5J&isAmazonFulfilled=0&seller=A2TB0DNDOM 4N96

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23 0	https://www.aliexpress.com/store/5235034
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23 5	https://www.aliexpress.com/store/4696057

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