

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

VALENTINO ROSSI,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE A HERETO,

Defendants.

Case No.: 20-cv-4746

Judge Virginia M. Kendall

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on VALENTINO ROSSI'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 VALENTINO ROSSI Trademarks (the "VR | 46 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 VR|46 Trademarks are distinctive marks and registered with the U.S. Patent and Trademark Office on the Principal Register as U.S. Trademark Registration No. 3,499,157 for the VR|46 mark, (2) Defendants are not licensed or authorized to use VR|46 Trademark, and (3) Defendants' use of the VR|46 Trademark is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with VALENTINO ROSSI. Furthermore, Defendants' continued and unauthorized use of the VR|46 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 VR|46 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 VR|46 Products or not authorized by Plaintiff to be sold in connection with Plaintiff's VR|46 Trademark;

- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine VR|46 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 VR|46 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 VR|46 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 VR|46 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 VR|46 Products; and

4. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as iOffer, eBay and PayPal, Inc. (“PayPal”), 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 VR|46 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 VR|46 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, eBay, PayPal, 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, 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, or other merchant account providers, payment providers,

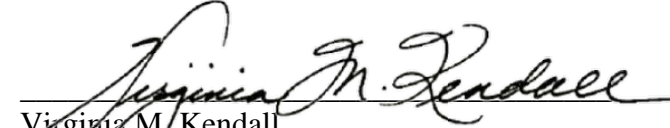
third party processors, and credit card associations (e.g., MasterCard and VISA).

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. eBay 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 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.
8. PayPal shall, within two (2) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:
 - a. Locate all accounts and funds connected to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any PayPal 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.
9. 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 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 "BLUESKYMALL and all other Defendants identified in Complaint" Schedule A that shall apply to all Defendants. The combination of providing notice via electronic publication or e-mail, along with any notice that Defendants receive from domain name registrars and payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.

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

Dated: September 16, 2020


Virginia M. Kendall
U.S. District Court Judge

SCHEDULE A

No.	Defendant Name / Alias
1	blueskymall
2	lamodacraze
3	suzhengmin236_2
4	tdt-53
5	hard2019
6	shirleyamotoys
7	yangyang2019
8	lingxingha
9	xiaoyzen_13
10	potatogold
11	wellcomeyou
12	09desma
13	adv020
14	ale-sega
15	asdefwaqa12
16	atoyx
17	bibobibo80
18	bonumagit
19	brandedhouse
20	chan8932
21	cndreammodel
22	cndreammodel_2
23	crystal2010*03
24	dasani68
25	delx6246
26	diehard_diecast
27	doozygoogol2004
28	drill_boss
29	dzishop
30	e8e.peter.store5
31	easternforest_t
32	ekinyangyiwei
33	ganggangtoy
34	haiz1021
35	jammats-0
36	jjy78478
37	kk-mart
38	luck_day2005

39	lwstore2013
40	ly19_98
41	makeeasy2u
42	makelifebeautiful2018
43	maksport
44	mardiari
45	min-2015
46	miniyellowcat
47	monsterdiecast_2011
48	mostlytoy
49	moxtoys
50	myfamcart
51	namokrab
52	newstar*2019
53	nguye9083
54	niipiistore
55	nuoya2012
56	ny1994chuhanyao1
57	nygc_61
58	nygu70
59	nylik46
60	nymani5
61	nyqih-98
62	nyzhangsa88
63	pandavia-model
64	pannelshop
65	patrkh8
66	qhhappy-store666
67	red_star1689
68	red_star2013
69	roofworldus
70	salefeel
71	saygood2017
72	sc_store999
73	scopedog2009
74	shop-123-shop
75	shop2009mb
76	shopandenjoy0
77	smarttree66
78	springwindblowing
79	starshop*2012

80	submarineivan
81	sunnymayhair
82	supermodeler-903
83	szsuper789654
84	szzhangjun200010
85	taiwan-bear
86	tomsbeststore
87	topmail123
88	tototoys2015
89	toys_store_china
90	toys-island
91	tzechai88
92	valvenus
93	violet0705
94	virventures_us
95	weilai5537
96	wellymodels
97	wx6688
98	xiangwyan_0
99	ypqk8591
100	beautiful789
101	cjzh201988
102	honesty2018789
103	dan_7234
104	hatai86
105	kinhdohue688
106	dcsports99
107	erikayuan
108	princeindo
109	shishang8866
110	wira74
111	1cn7157
112	alewsh0
113	andirawa_3
114	arka-id2015
115	ashelysakidd-5
116	atsulist-0
117	baibaorui
118	capricorn_cloud
119	careplusinstruments
120	cucle78

121	dindmay-0
122	duah-97
123	famous_leather
124	fashionstore_allen
125	fellmanal0
126	fiko-shop
127	force-g
128	golbrews
129	good789-a1
130	gris-4
131	habgoods
132	happysoppingz
133	ion_nicole
134	irfakalai_0
135	ismaies0
136	ismawa932
137	jala_sz58n3cm
138	jia_qs9lulmd
139	johid57
140	kartao0
141	knight823922
142	knightofgod2018
143	kodok1j
144	kopsus_4
145	lixij-15
146	momogear
147	motorcyclestoreindia
148	muhammadusmashahi_0
149	neo_sens33
150	newfashion_412
151	nguli_7248
152	nguyvie0
153	papeblac0
154	pengfei_hk
155	quni_57
156	racefaster_106666
157	revalintema-0
158	rikari-0
159	road2ride
160	rumis-82
161	sal-7028

162	samuel-shop
163	sharchug-0
164	shishang7898
165	shiyaxuan
166	shuidaoqucheng168
167	silu_9281
168	silvequee_0
169	sinst-55
170	so-company-london
171	stalion-road-gear
172	superknight2019
173	suteng_2018
174	syedalitariq
175	tadasleni
176	terba5.16
177	uk-mart-ltd
178	vehicle-shopping99
179	viralurban
180	windy868
181	xenia-store
182	xuwentaojj
183	zahiddar007
184	kageden
185	rurubp3.r41
186	chencuiping3568
187	ezhuhl
188	quanxishe0
189	rangjisv711
190	shi1531
191	tuopi73
192	wangxin986
193	9538_gujipll
194	tonso-0
195	ys941
196	smile-seller
197	zs793-58
198	lingningu
199	tangmou19
200	taoyuanop936
201	dnrchan
202	Suzhou Sincere Gift Co., Ltd.

203	yihanstore
204	abuchor-0
205	aldpamungka-0
206	anon-27
207	blr_11
208	blueskydc
209	changjiang166
210	chnگوی_24
211	color.of.the.wind.68
212	cos-wigs
213	cui083
214	cyxh8956
215	danggf9sc2_5
216	dhijsh956jj
217	diaandala_0
218	future1051
219	goodstuffdor2000
220	hengyie888
221	hlyhxc_5
222	huapeng34724
223	hunguy61
224	ivve.goods
225	jfiengkkoi
226	jojo1971thailand
227	jokowowz
228	jwueck007
229	kitty.ada
230	livec-64
231	longt-98
232	luc-926834
233	luckyshop_thai168
234	pvxt8686
235	rian-dev
236	rybebu
237	sales_moto
238	skybl-5200
239	soleildumatin
240	songliw_2
241	sya_syaw
242	tina9584
243	tulb9rx37

244	us-emarket
245	vandewel-0
246	xhhsudji88
247	xskgh99ushg887
248	yiyojoy
249	zhouchunjin
250	zxcjkuys
251	Bestpins Craft Factory
252	Dongguan Airuilong Gifts Ltd.
253	445zhu3
254	alijoh-4
255	areyoumotor_2
256	fs-motorcycle
257	gamio_motor
258	goodjob*2013
259	hirokopuzzle
260	khunsomsong
261	lovebead1980
262	lychee-craft
263	mygoodgift
264	ptmyi-moto
265	wangrea
266	wesiji0
267	poohtawanstore
268	thanacyberstore
269	awalwatchshop
270	ari.surya
271	bruceisa
272	dedia_5
273	dewsum_0
274	farfarashan
275	firdauazza0
276	kilmi._61
277	mantan66_3
278	na_zrie817
279	nariawer
280	nununsusilaningsi0
281	pundowo
282	edoor_wears
283	ynrsportsfitnesslimited
284	cheers_industries

285	mianmunawachaudhar0
286	steadyinstruments
287	bestuniformsellers
288	bikerplus2019
289	business_growth_hub_fzc
290	dnc-sports
291	doylebailleston0
292	ezishop
293	hasaf-5975
294	myriderhouse-5
295	innovationcustom
296	maztana
297	andrfahrezarustand0
298	dodol_case
299	folkusgalena
300	ricardsta79
301	romi_59
302	ujjo_0
303	akhtarh_44
304	bingoofashions
305	delsil-ent
306	luida_83
307	mansurjamesha_0
308	skarvix
309	dmitrilipato-0
310	hk5-ufolrhmt
311	luxuryprint
312	mukh-andr
313	best-deals1996
314	fan_zone_store
315	misashop86
316	phonatic2017
317	jariyaamala_0
318	lofortwo
319	lydleev
320	rzmoto
321	woo.bestbuy
322	yes2yeah
323	hobby-sky
324	jintora
325	rephael09

326	giftfromcompany
327	patcw_5
328	cyclingvelo
329	fashionshade
330	graceful_lady1
331	jadoug_76
332	kwanpornta_0
333	patch_forever
334	anurawongsathi-0
335	prakasilahanno-0
336	anakinkl

No	Defendants Online Marketplace
1	https://www.ebay.com/usr/blueskymall
2	https://www.ebay.com/usr/lamodacraze
3	https://www.ebay.com/usr/suzhengmin236_2
4	https://www.ebay.com/usr/tdt-53
5	https://www.ebay.com/usr/hard2019
6	https://www.ebay.com/usr/shirleyamotoys
7	https://www.ebay.com/usr/yangyang2019
8	https://www.ebay.com/usr/lingxingha
9	https://www.ebay.com/usr/xiaoyzen_13
10	https://potatogold.ecrater.com
11	https://wellcomeyou.ecrater.com
12	https://www.ebay.com/usr/09desma
13	https://www.ebay.com/usr/adv020
14	https://www.ebay.com/usr/ale-sega
15	https://www.ebay.com/usr/asdefwaqa12
16	https://www.ebay.com/usr/atoyx
17	https://www.ebay.com/usr/bibobibo80
18	https://www.ebay.com/usr/bonumagit
19	https://www.ebay.com/usr/brandedhouse
20	https://www.ebay.com/usr/chan8932
21	https://www.ebay.com/usr/cndreammodel
22	https://www.ebay.com/usr/cndreammodel_2
23	https://www.ebay.com.sg/usr/crystal2010*03
24	https://www.ebay.com/usr/dasani68
25	https://www.ebay.com/usr/delx6246
26	https://www.ebay.co.uk/usr/diehard_diecast
27	https://www.ebay.com/usr/doozygoogol2004

28	https://www.ebay.com/usr/drill_boss
29	https://www.ebay.com/usr/dzyshop
30	https://www.ebay.com/usr/e8e.peter.store5
31	https://www.ebay.com/usr/easternforest_t
32	https://www.ebay.com/usr/ekinyangyiwei
33	https://www.ebay.com/usr/ganggangtoy
34	https://www.ebay.com/usr/haiz1021
35	https://www.ebay.com/usr/jammats-0
36	https://www.ebay.com/usr/jjy78478
37	https://www.ebay.com/usr/kk-mart
38	https://www.ebay.com/usr/luck_day2005
39	https://www.ebay.com/usr/lwstore2013
40	https://www.ebay.com/usr/ly19_98
41	https://www.ebay.com/usr/makeeasy2u
42	https://www.ebay.com/usr/makelifebeautiful2018
43	https://www.ebay.com/usr/maksport
44	https://www.ebay.com/usr/mardiari
45	https://www.ebay.com/str/min2015
46	https://www.ebay.co.uk/usr/miniyellowcat
47	https://www.ebay.com.my/usr/monsterdiecast_2011
48	https://www.ebay.com/usr/mostlytoy
49	https://www.ebay.com/usr/moxtoys
50	https://www.ebay.com/usr/myfamcart
51	https://www.ebay.com/usr/namokrab
52	https://www.ebay.com/usr/newstar*2019
53	https://www.ebay.com/usr/nguye9083
54	https://www.ebay.com/usr/niippiistore
55	www.ebay.com/usr/nuoya2012
56	https://www.ebay.com/usr/ny1994chuhanyao1
57	https://www.ebay.com/usr/nygc_61
58	https://www.ebay.com/usr/nygu70
59	https://www.ebay.com/usr/nylik46
60	https://www.ebay.com/usr/nymani5
61	https://www.ebay.com/usr/nyqih-98
62	https://www.ebay.com/usr/nyzhangsa88
63	https://www.ebay.com/usr/pandavia-model
64	https://www.ebay.com/usr/panelshop
65	https://www.ebay.com/usr/patrhk8
66	https://www.ebay.com/usr/qhhappy-store666
67	https://www.ebay.com/usr/red_star1689
68	https://www.ebay.com/str/redstar201349

69	https://www.ebay.com/usr/roofworldus
70	https://www.ebay.com/usr/salefeel
71	https://www.ebay.com/usr/saygood2017
72	https://www.ebay.com/usr/sc_store999
73	https://www.ebay.com/usr/scopedog2009
74	https://www.ebay.co.uk/usr/shop-123-shop
75	https://www.ebay.com/usr/shop2009mb
76	https://www.ebay.com/usr/shopandenjoy0
77	https://www.ebay.com/usr/smarttree66
78	https://www.ebay.com/usr/springwindblowing
79	https://www.ebay.com/usr/starshop*2012
80	https://www.ebay.co.uk/usr/submarineivan
81	https://www.ebay.com/usr/sunnymayhair
82	https://www.ebay.com/usr/supermodeler-903
83	https://www.ebay.com/usr/szsuper789654
84	https://www.ebay.com/usr/szzhangjun200010
85	https://www.ebay.com/usr/taiwan-bear
86	https://www.ebay.com/usr/tomsbeststore
87	https://www.ebay.com/usr/topmail123
88	https://www.ebay.com/usr/tototoys2015?_trksid=p2047675.12559
89	https://www.ebay.com/usr/toys_store_china
90	https://www.ebay.com/usr/toys-island
91	https://www.ebay.com/usr/tzechai88
92	https://www.ebay.com/usr/valvenus
93	https://www.ebay.com/usr/violet0705
94	https://www.ebay.com/usr/virventures_us
95	https://www.ebay.com/usr/weilai5537
96	https://www.ebay.com/usr/wellymodels
97	https://www.ebay.com/usr/wx6688
98	https://www.ebay.com/usr/xiangwyan_0
99	https://www.ebay.com/usr/ypqk8591
100	https://www.ebay.com/usr/beautiful789
101	https://www.ebay.com/usr/cjzh201988
102	https://www.ebay.com/usr/honesty2018789
103	https://www.ebay.com/usr/dan_7234
104	https://www.ebay.com/usr/hatai86
105	https://www.ebay.com/usr/kinhdohue688
106	https://dcsports99.ecrater.com
107	https://erikayuan.ecrater.com
108	https://princeindo.ecrater.com
109	https://www.dhgate.com/wholesale/products/ff8080815e04b2bf015e8aff6a304bb.html

110	https://wira74.ecrater.com
111	https://www.ebay.com/usr/1cn7157
112	https://www.ebay.com/usr/alewsh0
113	https://www.ebay.com/usr/andirawa_3
114	https://www.ebay.com/usr/arka-id2015
115	https://www.ebay.com/usr/ashelysakidd-5
116	https://www.ebay.com/usr/atsulist-0
117	https://www.ebay.co.uk/usr/baibaorui
118	https://www.ebay.com/usr/capricorn_cloud
119	https://www.ebay.com/usr/careplusinstruments
120	https://www.ebay.co.uk/usr/cucle78
121	https://www.ebay.com/usr/dindmay-0
122	https://www.ebay.com/usr/duah-97
123	https://www.ebay.com/usr/famous_leather
124	https://www.ebay.com/usr/fashionstore_allen
125	https://www.ebay.com/usr/fellmanal0
126	https://www.ebay.com/usr/fiko-shop
127	https://www.ebay.com/usr/force-g
128	https://www.ebay.com/usr/golbrews
129	https://www.ebay.com/usr/good789-a1
130	https://www.ebay.com/usr/gris-4
131	https://www.ebay.com/usr/habgoods
132	https://www.ebay.com/usr/happyshoppingz
133	https://www.ebay.com/usr/ion_nicole
134	https://www.ebay.com/usr/irfakalai_0
135	https://www.ebay.co.uk/usr/ismaies0
136	https://www.ebay.co.uk/usr/ismawa932
137	https://www.ebay.com/usr/jala_sz58n3c?_trksid=p2047675.12559
138	https://www.ebay.co.uk/usr/jia_qs9lulmd
139	https://www.ebay.com/usr/johid57
140	https://www.ebay.com/usr/kartao0
141	https://www.ebay.com/usr/knight823922
142	https://www.ebay.com/usr/knightofgod2018
143	https://www.ebay.com/usr/kodok1j
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