UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

GENERAL TOOLS & INSTRUMENTS, LLC

Plaintiff, Case No.: 1:20-cv-01036

v. Judge Jorge L. Alonso

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

Magistrate Judge Susan E. Cox

Defendants.

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff, GENERAL TOOLS & INSTRUMENTS, LLC ("GENERAL TOOLS" or "Plaintiff"), Motion for a Preliminary Injunction, and this Court having heard 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 (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. "In the context of cases like this one, that means a plaintiff must show that each defendant is actually operating an interactive website that is accessible in Illinois and that each defendant has aimed such site at Illinois by standing ready, willing and able to ship its counterfeit goods to customers in Illinois in particular (or otherwise has some sufficient voluntary contacts with the state)." *Am. Bridal & Prom Indus. Ass'n v. P'ships & Unincorporated Ass'ns Identified on Schedule A*, 192 F.Supp.3d 924, 934 (N.D. Ill. 2016). In this case, Plaintiff has presented screenshot evidence that each Defendant Internet Store is reaching out to do business with Illinois residents by operating one or more commercial, interactive Internet Stores through which Illinois

residents can and do purchase products using counterfeit versions of Plaintiff's Trademarks. *See* Docket No. 14 which includes screenshot evidence confirming that each Defendant Internet Store does stand ready, willing and able to ship its counterfeit goods to customers in Illinois bearing infringing and/or counterfeit versions of the ANGLE-IZER Trademark Nos. 5,345,751; 5,345,752 and Plaintiff's ANGLE-IZER Copyright Nos. VA0002183652; VA0002183717 (collectively, the "ANGLE-IZER Trademarks").

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 GENERAL TOOLS's previously granted Motion for a Temporary Restraining Order establishes that GENERAL TOOLS has a likelihood of success on the merits; that no remedy at law exists; and that GENERAL TOOLS will suffer irreparable harm if the injunction is not granted.

Specifically, GENERAL TOOLS has proved a *prima facie* case of trademark infringement because (1) the ANGLE-IZER trademarks are a distinctive mark and registered with the U.S. Patent and Trademark Office on the Principal Register and the ANGLE-IZER Works are registered with the United States Copyright Office, (2) Defendants are not licensed or authorized to use any of the ANGLE-IZER trademarks and ANGLE-IZER Works, and (3) Defendants' use of the ANGLE-IZER trademarks and ANGLE-IZER Works is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with GENERAL TOOLS. Furthermore, Defendants' continued and unauthorized use of the ANGLE-IZER trademarks and ANGLE-IZER Works irreparably harms GENERAL TOOLS through diminished goodwill and brand confidence, damage to GENERAL TOOLS's reputation, loss of exclusivity, and loss of future

sales. Monetary damages fail to address such damage and, therefore, GENERAL TOOLS 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:

- 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 GENERAL TOOLS' ANGLE-IZER or any 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 ANGLE-IZER product or not authorized by GENERAL TOOLS to be sold in connection with GENERAL TOOLS's ANGLE-IZER trademarks and ANGLE-IZER Works;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine ANGLE-IZER product or any other product produced by GENERAL TOOLS, that is not GENERAL TOOLS's or not produced under the authorization, control or supervision of GENERAL TOOLS and approved by GENERAL TOOLS for sale under GENERAL TOOLS's ANGLE-IZER trademarks and ANGLE-IZER Works;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of GENERAL TOOLS, or are sponsored by, approved by, or otherwise connected with GENERAL TOOLS;

- d. further infringing GENERAL TOOLS's ANGLE-IZER trademarks and ANGLE-IZER Works and damaging GENERAL TOOLS 's goodwill;
- e. 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 GENERAL TOOLS, nor authorized by GENERAL TOOLS to be sold or offered for sale, and which bear any of GENERAL TOOLS 's ANGLE-IZER trademarks and ANGLE-IZER Works or any reproductions, counterfeit copies or colorable imitations thereof;
- f. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, or any other online marketplace account that is being used to sell Counterfeit/Infringing ANGLE-IZER Products; and
- g. operating and/or hosting at the Online Marketplace Accounts and any other online marketplace names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing GENERAL TOOLS's ANGLE-IZER trademarks and ANGLE-IZER Works or any reproductions, counterfeit copies or colorable imitations thereof that is not a genuine ANGLE-IZER product or not authorized by GENERAL TOOLS to be sold in connection with GENERAL TOOLS's ANGLE-IZER trademarks and ANGLE-IZER Works.
- 4. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as Alibaba Group Holding Ltd. along with any related Alibaba entities (collectively, "Alibaba"), social media platforms, Facebook, YouTube, LinkedIn, Twitter,

Internet search engines such as Google, Bing and Yahoo, 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 ANGLE-IZER trademarks and ANGLE-IZER Works, 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 ANGLE-IZER trademarks and ANGLE-IZER Works; and
- c. take all steps necessary to prevent links to the Defendant Online Marketplace Accounts identified in Schedule A from displaying in search results, including, but not limited to, removing links to the Online Marketplace Accounts from any search index.
- 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. Western Union shall, within two (2) business days of receipt of this Order, block any Western Union money transfers and funds from being received by the Defendants identified in Schedule A until further ordered by this Court.
- 8. eBay, Inc. ("eBay"), PayPal, Inc. ("PayPal"), ContextLogic, Inc. ("WISH"), Amazon Payments, Inc. ("Amazon"), Alipay US, Inc. and its entities ("Alipay"), Alibaba Group Holding Limited ("Alibaba"), Tophatter, Inc. ("Tophatter") and Walmart, Inc.

("Walmart"), 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, PayPal, WISH, Amazon, Alibaba, Tophatter and Walmart accounts connected to the information listed in Schedule A hereto or the email addresses identified in Exhibit 3 to the Declaration of Ralph Mallozzi; and
- b. Restrain and enjoin any such accounts or funds that are non-U.S. foreign based from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 9. Any banks, savings and loan associations, payment processors, or other financial institutions, for any Defendant or any of Defendants' Online Marketplace Accounts or websites, shall within two (2) business days of receipt of this Order:
 - a. Locate all accounts and funds connected to Defendants, or Defendants'
 Online Marketplace Accounts, including, but not limited to, any accounts
 connected to the information listed in Schedule A hereto or the email addresses
 identified in Exhibit 3 to the Declaration of Ralph Mallozzi; and
 - Restrain and enjoin such accounts from receiving, transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 10. GENERAL TOOLS 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 3 to

the Declaration of Ralph Mallozzi 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 "van and all other Defendants identified in Complaint" that shall apply

to all Defendants. The combination of providing notice via electronic publication and 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.

11. Any Defendants that are subject to this Order may appear and move to dissolve or modify

the Order on two days' notice to GENERAL TOOLS or on shorter notice as set by this

Court.

12. The \$10,000 bond posted by GENERAL TOOLS shall remain with the Court until a Final

disposition of this case or until this Preliminary Injunction is terminated.

SO ORDERED.

ENTERED: July 22, 2020

JORGE L. ALONSO

United States District Judge

SCHEDULE A

NO.	DEFENDANTS
1	van
2	wioper
3	threedragon mart
4	HK shanhai group limited
5	
6	Lifetree intl
7	EYDeed
8	
9	Coolgos
10	Shenzhen Duoduoshop e-Commerce Ltd
11	Easy_deal
12	hong qi baby
13	
14	hongwanling
15	CHINESE STORE
16	
17	
18	Tom In Box
19	Clock220
20	Wenzhou fashion jewelry
21	
22	DIY-crazy
23	walkpros
24	Life or death
25	еро
26	tyn
27	giftformybestfriend
28	hho
29	HINTEANI
30	HYFAN
31	ycjhenry
32	magyian
33	maoxian
34	haaviiiaiu
35	haoyijiaju
36	LOVE-xinwei CIVITATIS
37	CIVITATIS

38	
39	wangweiwang
40	blueshabbychic
41	Tongmao parts store
42	taogis stone
43	Madmiss Alice
44	singtrip
45	Go.girl
46	
47	TechKen
48	Sharing Fashion
49	fancyqube
50	
51	iWantZone.com
52	bolin2019
53	
54	MEI11
55	
56	mikefu
57	Doublebean
58	PHYF
59	little elephant
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61	claritalley
62	ggjfbm123
63	YHurd Yu Juntong Store
64	zhenxindaini
65	limeibulou
66	Wu Yanyan's shop
67	you jian huo zhan
68	a_coming
69	wanhaoxiaodian
70	Everything possible Clothes
71	lililimanlisha
72	wuxueping159
73	Jean Purchase
74	Nine-star Guide
75	ABDshop4u
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77	
78	
79	berry
80	YBay
81	chens
82	**yosifov_global**
83	*best_daily_deals*
84	*lovely_valentin*
85	2008outdoorsell
86	2013blingmall
87	2015updayday
88	2fit_fitness_shop
89	7starstore
90	88uniquesshop
91	a2z-discounts
92	
93	abshop.shop
94	activelifestore2018
95	ag-just-for-you
96	ahnafonline
97	aiqy2913
98	alzhamm1_1
99	andfeti-43
100	andgre-91
101	apdp11
102	ayelal96
103	bananawinterstore
104	bargain_world_888
105	bel_3985
106	berlin201692
107	besric
108	best_deals_service
109	best-sharing
110	best-supplies-2-u
111	
112	bettercheer
113	
114	bg-babygroove
115	bluestoremarto

116	boatpropeller
117	bobamarinesstore
118	bollybelly
119	buyouritem
120	by_to_shine
121	carol_yeah
122	cases-store99
123	clickisyesterday
124	clinkz-bone
125	cobala_989
126	coodia_200
127	
128	cuhoan_13
129	cwinpaper01
130	dacasback
131	dailynecessities0.99
132	dailytrips
133	danbuj-10
134	danielleshoppe
135	davidsgroup
136	deadsea_product
137	dealstore
138	dhestore
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140	directbuy-es
141	downtownmall
142	dragonwang876_3
143	
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145	dvdbarato-es
146	e-seller2040
147	e-shippyshop
148	easy_trader_74
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151	epicesolutions
152	ete-mall
153	extra-one
154	factorykiss-oz

155	fastitemshop
156	fastnewsales
157	fjhllmy
158	fjxmcx2006
159	IJAINCA2000
160	gadgetzoneuk
161	galaxyshop19
162	genevievephil
163	ggc-ltd
164	gintaryno-02
165	glieb-0
166	gooddeals-123
167	goods-direct-goods
168	greatkingdom11
169	green_park99
170	greentree199
171	hammo123ye
172	happy_shop_2019
173	hittory-tool
174	hooyon
175	hotdeals666
176	igadgitz_usa
177	imbargains24-7
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179	irlowcost
180	jafsalonline
181	jamie_leiffers
182	jonalo-30
183	koko-global
184	kotl_guan
185	ktstoregroup
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187	lalashop9x
188	lestyam-50
189	liufelian_0
190	liuxiaoxiao163
191	loftydeals2018
192	longshineau
193	mackipaki-shop

194	mafdetstore
195	magicfashion_uk
196	magicgift
197	makife
198	makire
199	mathkum0
200	maxsuperstoreservice
201	manusaportstoreser vice
202	mirana-prince
203	mohelz-99
204	moonandstar_inthesky
205	mubk2784
206	myshop-online24
207	nacuc_66
208	nadash-62
209	newyearstore
210	ngta-37
211	nguye3536
212	niikae
213	nikecome
214	ninja.deals
215	niyachacha
216	no2parts
217	northpolelabs
218	obdtoolshop
219	one_belt_one_road
220	pengarregproduct
221	perfectdeal20199
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224	profitable.deal
225	protools2019
226	puridian_ttr89
227	purplefary
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233	room down
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234	rotrahobbies2013
235	salewish
236	saqlain1214
237	sarunhardware
238	sea-people-marine
239	shop_easy555
240	shoppingmadeeasy2
241	small-shop-4u
242	smart_shopping_3
243	
244	solutions_4you
245	som_sye
246	star_wars_world
247	starlifelighting
248	startup-27
249	stray_uk
250	supanut2006
251	
252	supersale0011
253	supper_sell
254	sydney-opera-house
255	tapestryindia
256	tenper365
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258	themisstore
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260	tool-edge
261	toshikatsuhamana
262	trackbase2016
263	trybest5
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265	ubiversalstore
266	uk_dealsguru
267	universal-world
268	vitrin_39
269	waelayad
270	wanggaofeng163
271	warehousediscountsales

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274	wecostlessstore
275	wittymotor
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277	worldnow
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279	yellow-star11
280	yes-ship-2days
281	yesgarden
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284	your-shop-999
285	zaushop
286	zephstock
287	
288	zkh2011
289	zoutianyaa
290	Going Merry Store
291	OK General Store
292	TONIKMM
293	KZ Development
294	Pandamen NLH
295	Talent Products
296	lvliangshilishiquxiaoguangbianlidian
297	
298	HS Store Shop
299	ASD Accessories
300	Cosmoware
301	Asien Direct
302	GuaGua
303	Wanpako
304	MABEST
305	ANTIK shop
306	SEMKO
307	LANGINGUS
308	Colorlight
309	Kottle
310	ZivaTech

311	Mingpinhuius
312	Minielectro
313	tenyears
314	tonyours
315	liyunshop
316	AEmber BK
317	MTSK-NA
318	Eternal Cover
319	Lin-Tong.
320	JJEcommUS
321	JTs
322	★Bestchoice★
323	Veles Shop
324	LAPHs
325	Rabinyod_Bulan
326	
327	Gwill
328	TTOBS
329	HomeAccessory
330	
331	Amenitee Brand LLC
332	ggfdsgsdag
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335	"Almark" LLC
336	Topsame Store
337	STAR RICH
338	NEWLIFEE
339	OLE STAR
340	theoneshop66
341	Xiaolanwelc
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343	Single Mom Shop
344	
345	Liberty Tribe
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347	DaKuHo
348	guanyunxiu7-US
349	Aoymimii Store

350	ZENDY USA
351	MIRACLE9
352	MINITEDES
353	RIMDOMN
354	On-time store
355	TopVendor
356	Future on
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358	CongUS
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360	S5E5X
361	SHI RAN
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363	Weiye Pro
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366	Best Gess
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368	BE-TOOLUS
369	Dong Ran
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372	WTFM
373	fsdualwin-us
374	chenwenweius
375	WKFSDAG
376	globalbestshop
377	kutrer
379	PASTEL
380	BITOO
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382	Amazing Tools
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384	Moneil Tech
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386	Portos Max
387	Fashion US01
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391	Zajo Products
392	VHRz
393	Waterp
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417	The Luxe Products Company
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420	Spark mid-US
421	RotekDirect
422	WCE Marketplace
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424	BERNIE ANSEL
425	Cool Club
426	TQP-CK-US
427	baree shop
428	Super Party Boy

429	Amenytool
430	Sellers trustworthy tree
431	LL Bridal
432	HUAZHAO-US
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441	CUORE BANGKOK
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443	Lexiesxue CSF Store
444	Jormar Essentials
445	Jwn
446	YUKONIX
447	Sayfunny
448	Exe Tool
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450	Wild Donkey
451	CJR
452	veteran innovations
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454	Leo-4Beauty
455	PiggiesC
456	SANSUM
457	palapolshop
458	XUYF
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460	Gano Zen
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465	fu lian
466	Unique Value Inc
467	Allenhope

469 ZANAN 470 Max Happy Shopping 471 S-BETTER 472 S-Sport-Life 473 Mulslect 474 zotoyashop 475 G & H E-MARKETING 476 Lameeeei 477 Orange Tools 478 Mr.Scotch 479 GIIH 480 481 KKING 482 483 Dpowro Direct 484 EnCoCo District 485 Hanzhong E-commerce 486 MONICO SHOP 487 HOHXEN 488 UMINI 489 490 DGXIAKE 491 KeepTpeeK 492 LONGTINGSIHAI 493 M.A.A.P 494 aohang 495 U GOT A DEAL 496 ruichi7-US 497 Nazala 498 Cosymart 499 Plakza 500 tanya shop 501 kunkung05 502 BELONG STORE	468	
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508	FUQIANG
509	Brilliant Smart
510	Difficult Silicit
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513	KYRASA
514	RIKAS SHOP
515	WCHAOEN
516	KINWAT STORE
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518	TEPLO
519	AllInOneShop
520	peppermint07
521	JIALIUJ Store
522	Holeco Outlet
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527	Ur Unique U
528	PANDAMarket
529	LinXianQingLiangSiErLongRiZaShangDian
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531	ZiZang
532	YI NUO Business purchase
533	Annibus
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535	TUYOU
536	Sforza.
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538	Yourfriend Store
539	Shanghang
540	Basonx-US
541	Resistance ha
542	Derek One
543	ttnight
544	Fishing Accessories
545	Very Happy Shop

546	Reminder Me
547	Umiller
548	Global Retail Merchandise Store
549	FN-Tool Store
550	NightStar Store
551	Tugustal Store
552	MEASURING TOOLS-KACYTOOLS
553	Toplander Outdoor Store
554	FLY BABY
555	Sisiters Tools&Lighting Store
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559	LemonBest Housesupply Store
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562	Tool&Tools Store
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564	LemonBest Franchised Store
565	WZB Global Store
566	Beautiful Exquisite Life Dropshipping Store
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572	MainPoint Tools Store
573	MIRUI
574	DBird Tool Store
575	DOWILL Store
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577	Learning education Store
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579	Numerous Creation Store
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582	Halojaju Department Store
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505	Vina Dat Markat Store
585	KingPet Market Store
586	The world's leading precision cutting tool Store
587	01 2045114 0
588	Shop2945114 Store
589	WINDOOD AND A G
590	WINOCEAN Tools Store
591	GI 2070077 G
592	Shop2960077 Store
593	BZNVN Store
594	Shop2998064 Store
595	ABEDOE Franchised Store
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597	Houkiper Eiile's Daylife Store
598	jiguoor Direct Store
599	Shop3199063 Store
600	ABEDOE Online Store
601	Mastool Distribution Store
602	ABEDOE Creativelife Store
603	Youool Livelihood Drop shopping Store
604	JOYJOY Learning Store
605	lamplight Store
606	Houkiper Specialy Store
607	Houkiper Households life Store
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609	Happiness Light Store
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611	Trendy Luckyy Store
612	Zeego Store
613	Zenpan Store
614	ShenZhen Instrument Tool Drop Shipping Store
615	Tools&Instruments Professional Store
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618	Marvellous Life Store
619	adorn your house Store
620	ABEDOE Magical diet Store
621	ABEDOE Energetic Store
622	Houkiper Daily Department Store
623	Oh La La Store
624	Kitchen Accessories Factory Direct Store

625	Joey'S Small Store
626	Youool Dreamfamily Store
627	Houkiper Drop shoping Store
628	ABEDOE WarmDreams Store
629	Youool Homestead Drop Shopping Store
630	ABEDOE DropShipping Store
631	3C Electron Dropshipping Store
632	Buy for Your Lifestyle Store
633	Pangpang Life Store
634	Ai Shenghuo Store
635	Houkiper Abbe Store
636	LemonBest Intelligent Store
637	LemonBest Upward Store
638	Yangmin Camping Store
639	Houkiper Terry Store
640	ABEDOE Twenty Two Store
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642	Instrument&Tools Ali Store
643	BearLink Store
644	Youool Hometown Drop shopping Store
645	Youool Tool Light drop ship Store
646	Youool Tool Store
647	Yi Xinglong Store
648	Konesky Store
649	YL LOVEHOME Life Store
650	Youool House Dropshipping Store
651	2019 Drop Shipping Store
652	Shop4997163 Store
653	Houkiper Klay A Store
654	
655	Life Assistant Store
656	TopDsf Global Store
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658	rozzisoue Yan Jie Teaching Stationery Store
659	Yiwu Small Commodity Market Store
660	Nicer Life Store
661	Ai Dou Tools Store
662	Lovelife2019 Store
663	Shanmammy dropship Store

664	Sunlight0123 Store
665	Tool Expert Store
666	SPIFFLYER RainbowSun Store
667	Joliemaison Franchised Store
668	Joliemaison Tool Store
669	Solria Store
670	A Warm Cottage Store
671	A comfortable house Store
672	Room Professional Simplifi-er Store
673	Shop5244171 Store
674	Tooline Store
675	金华万丰工具源头厂家
676	Shenzhen DJX Electronic & Technology Co., Ltd.
677	Ningbo Dream Union Home Products Co., Ltd.
678	Wenling Wenqiao Kung Chan Tools Firm
670	
679	Changhan Thausandahansa Tashualasu Ca. Lad
680	Shenzhen Thousandshores Technology Co., Ltd.
681	Jinhua Kacy Tools Co., Ltd.
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683	Shanxi Lisca Materials Co., Ltd.
684	LONG JER PRECISE INDUSTRY CO., LTD.
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686	JUI SHIH YA ENTERPRISE CO., LTD.
687	Shenzhen Qiansheng Technology Co., Ltd.
688	Suzhou Zhixinhang Hardware & Electrical Co., Ltd.