

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

ART ASK AGENCY,	)	
	)	Case No.: 20-cv-04580
Plaintiff,	)	
	)	Judge: Jorge L. Alonso
v.	)	
	)	
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 ART ASK AGENCY’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 infringing products (the “Counterfeit ANNE STOKES Products”).

THIS COURT FURTHER FINDS 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 ANNE STOKES Trademark is a distinctive mark, (2) Defendants are not licensed or authorized to use the ANNE STOKES Trademark or make derivative works using ANNE STOKES' Copyrights, and (3) Defendants' use of the ANNE STOKES Trademark is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with ASK ART AGENCY.

Defendants' continued and unauthorized use of ANNE STOKES Trademark and Copyrights 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 enjoined and restrained from:
  - a. using Plaintiff's ANNE STOKES Trademark and Copyrights in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine ANNE STOKES Products or not authorized by Plaintiff to be sold in connection with Plaintiff's ANNE STOKES Trademark and Copyrights;
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 they own

and/or operate (c) their financial accounts, including all Contextlogic, Inc. ("Wish") accounts, and (d) the steps taken by each Defendant to comply with paragraph 1(a) above.

3. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as iOffer, Wish, 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 seven (7) 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 ANNE STOKES Trademark and Copyrights, including any accounts associated with the Defendants listed in Schedule A; and

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 ANNE STOKES Trademark and Copyrights.

4. 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, Wish, 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 Wish, third party processors and other payment processing service providers, shippers, and domain name registrars (collectively, the "Third Party Providers") shall, within seven (7) 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, Alibaba or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

5. 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.
6. Wish 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 Wish 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.
7. 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 seven (7) business days of receipt of this Order:
  - a. Locate all accounts and funds connected to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any accounts connected to the information listed in Schedule A hereto; and
  - b. Restrain and enjoin such accounts from receiving, 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 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 Schedule A hereto; 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 "Han GuiH and all other Defendants identified in Schedule A to 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 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 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. 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: November 3, 2020

A handwritten signature in black ink, appearing to read "JL Alonso", is written over a horizontal line. The signature is enclosed within a large, hand-drawn oval.

Jorge L. Alonso  
U.S. District Court Judge

**SCHEDULE A**

<b>No.</b>	<b>Defendant Name / Alias</b>
1	Han GuiH
2	HUCHIDIANFU
3	xsystore
4	zhangxiaomidepu
5	huatiancuo
6	Sherry Lim
7	gnn
8	weve
9	Bridge new department
10	wanguangquan
11	xiaoliangge
12	xiaoxiaodejia
13	Julietroom
14	SUSUZHEN
15	zhizhizhi668
16	gaojihui
17	hemudan
18	haiwang shop
19	lifan
20	ChuHong store
21	Cursory fashion
22	fashion handicraft shop
23	sunye shop
24	Bellagirl
25	ExciteSports
26	LuckyQueen
27	MoonSun
28	OnlyLive
29	Rose&Jack
30	SnowyRain
31	Voguetopia
32	WearFashion
33	cvunhk online store
34	wyrwyr
35	csjnry supper-market
36	teetyv plaza
37	biandaren
38	toworld

39	Xiaojun579
40	xuliming
41	YM1989
42	13461046918@163.com
43	Anemone
44	autohunter
45	axdada
46	baiyanfuzhuangdian
47	bce
48	Bear's-paw
49	berization
50	biyingxiao
51	cengxpcn
52	chen1hao
53	chen2hao
54	chendiya
55	chnggujukj shopping
56	chunyu shop
57	cloud house
58	COLOR FOR YOUR HOME
59	Dalang ET
60	daleatt
61	dhyyouth0102
62	Diamond Painting DIY
63	die40946
64	Dilemma
65	Discount shopping malls
66	Dong Chen men's sexy underwear
67	engineer
68	Fast Colourful New Goods
69	fillup
70	FSyjiaren
71	Future society should be sexy
72	gailIranZkIo
73	GHKLDO
74	guangsheng008
75	Guo11zhi22Jiang33
76	hezongmaoyi
77	honghongshop
78	huihuixiaodian588
79	ice banana



80	Jahoo home decor
81	jiangzhaoxia2574
82	kai Ping Mei Park Diamond drawing
83	lijuan258
84	LongDa168 store
85	louyan fashion
86	Quincy
87	Roseng
88	rourouhaopiaoliang111
89	Selfies_Cool
90	Snow leopard
91	sujingmeishuiping
92	Super star international Ltd
93	Sweet Life Trading Co.,Ltd
94	tang wenyan
95	tangranran
96	taohuanxiang
97	The word
98	three cat
99	Three Korokke
100	TIAN GUO FU
101	TianYi DG
102	Trumpsale
103	tygb
104	vevru
105	Volvey Sanitary Ware Co., Ltd.
106	Wall Art Crafts Decor
107	wangjuan666
108	wangqianqiandedainpu
109	WangZha
110	WANGZHENGDIANFUDIANM
111	wenyinhuanfashionshop
112	wj170521
113	wodedidai
114	WorldInHands
115	wsn
116	wulizhen6788
117	xianmin
118	xiaolidianpu
119	xiaoxudiannao
120	xiaxiahuihong

121	xushuting180
122	yangguangqingqingxiaopu
123	YaoMing store
124	yebin
125	yincongcong552211
126	youshan21
127	ywcompeteyouth34
128	zhangyufangf
129	zhaojie12345
130	zhenglichun
131	zhenshikeji
132	zou123456
133	BLUELOVER
134	guangzhou ableway co.,ltd
135	Comer co.ltd.
136	guohu fashion
137	See Y Again
138	spy89ping@163.com
139	zhengqiaona
140	Chens store
141	fenqubeifan
142	imaginemfg
143	kuiaiwu
144	miracle shen
145	WuQunQun
146	zhangxiaowen030
147	canmun
148	dascez
149	fashiondesignstore
150	invariability store
151	Kawa e-Store
152	mklyuh wholeshop
153	Yuanyuan886
154	RhonTon
155	Shenzhen Rhondaton Trade Co. Ltd.
156	daxiaotuosu
157	The curtain
158	ZHENGJIANKAI

<b>No</b>	<b>Defendants Online Marketplace</b>
1	<a href="https://www.wish.com/merchant/5d5767f833f0b42642be94f6">https://www.wish.com/merchant/5d5767f833f0b42642be94f6</a>
2	<a href="https://www.wish.com/merchant/5d4d49833db43e240ebb46d6">https://www.wish.com/merchant/5d4d49833db43e240ebb46d6</a>
3	<a href="https://www.wish.com/merchant/5d3c28fce4b65d46ff1e7271">https://www.wish.com/merchant/5d3c28fce4b65d46ff1e7271</a>
4	<a href="https://www.wish.com/merchant/5af4572c7824ca7440395825">https://www.wish.com/merchant/5af4572c7824ca7440395825</a>
5	<a href="https://www.wish.com/merchant/57ceec76e9926f3e8986d78a">https://www.wish.com/merchant/57ceec76e9926f3e8986d78a</a>
6	<a href="https://www.wish.com/merchant/575827713a698c7a0867a353">https://www.wish.com/merchant/575827713a698c7a0867a353</a>
7	<a href="https://www.wish.com/merchant/5881917bbf61226bbf5ca016">https://www.wish.com/merchant/5881917bbf61226bbf5ca016</a>
8	<a href="https://www.wish.com/merchant/59dc9600dbd2827fc4a08120">https://www.wish.com/merchant/59dc9600dbd2827fc4a08120</a>
9	<a href="https://www.wish.com/merchant/58fa4991b25fc62ec8761a1e">https://www.wish.com/merchant/58fa4991b25fc62ec8761a1e</a>
10	<a href="https://www.wish.com/merchant/58cf809478bdec5202279dfc">https://www.wish.com/merchant/58cf809478bdec5202279dfc</a>
11	<a href="https://www.wish.com/merchant/58f4ed940da9f9119ec1b9fe">https://www.wish.com/merchant/58f4ed940da9f9119ec1b9fe</a>
12	<a href="https://www.wish.com/merchant/57b0002282843e18d85d0b06">https://www.wish.com/merchant/57b0002282843e18d85d0b06</a>
13	<a href="https://www.wish.com/merchant/59a3c0cd35e73b5b40f9d9fb">https://www.wish.com/merchant/59a3c0cd35e73b5b40f9d9fb</a>
14	<a href="https://www.wish.com/merchant/5d65e5ec36af5429801ea291">https://www.wish.com/merchant/5d65e5ec36af5429801ea291</a>
15	<a href="https://www.wish.com/merchant/580e07175250a21954205fc5">https://www.wish.com/merchant/580e07175250a21954205fc5</a>
16	<a href="https://www.wish.com/merchant/5807848d9a2dd742460f89ca">https://www.wish.com/merchant/5807848d9a2dd742460f89ca</a>
17	<a href="https://www.wish.com/merchant/575d0b52a96b345edd0bd8d8">https://www.wish.com/merchant/575d0b52a96b345edd0bd8d8</a>
18	<a href="https://www.wish.com/merchant/5aefd26ac96bb87c32ec9326">https://www.wish.com/merchant/5aefd26ac96bb87c32ec9326</a>
19	<a href="https://www.wish.com/merchant/5960ef89dba4dc60be5c23e7">https://www.wish.com/merchant/5960ef89dba4dc60be5c23e7</a>
20	<a href="https://www.wish.com/merchant/5d4e2902cabeec5e6f5c0828">https://www.wish.com/merchant/5d4e2902cabeec5e6f5c0828</a>
21	<a href="https://www.wish.com/merchant/57c00d17e8b60774e9569c30">https://www.wish.com/merchant/57c00d17e8b60774e9569c30</a>
22	<a href="https://www.wish.com/merchant/5ac1e082417cee7f5e009c02">https://www.wish.com/merchant/5ac1e082417cee7f5e009c02</a>
23	<a href="https://www.wish.com/merchant/5aebffd960cdb32de8c6a7c7">https://www.wish.com/merchant/5aebffd960cdb32de8c6a7c7</a>
24	<a href="https://www.wish.com/merchant/592fdbad1e6c1f506c601649">https://www.wish.com/merchant/592fdbad1e6c1f506c601649</a>
25	<a href="https://www.wish.com/merchant/573d6dd2c13dbe5949a59cb6">https://www.wish.com/merchant/573d6dd2c13dbe5949a59cb6</a>
26	<a href="https://www.wish.com/merchant/58357037b63b3b249b0add84">https://www.wish.com/merchant/58357037b63b3b249b0add84</a>
27	<a href="https://www.wish.com/merchant/57e9e80cfc63524c262a53e2">https://www.wish.com/merchant/57e9e80cfc63524c262a53e2</a>
28	<a href="https://www.wish.com/merchant/5849010ad23c144d2e3b8ebd">https://www.wish.com/merchant/5849010ad23c144d2e3b8ebd</a>
29	<a href="https://www.wish.com/merchant/573ec455ef196159400a939d">https://www.wish.com/merchant/573ec455ef196159400a939d</a>
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31	<a href="https://www.wish.com/merchant/573d7e3a6b2b45591df10c7e">https://www.wish.com/merchant/573d7e3a6b2b45591df10c7e</a>
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63	<a href="https://www.wish.com/merchant/5b90bf35ad786629fbd2322">https://www.wish.com/merchant/5b90bf35ad786629fbd2322</a>
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65	<a href="https://www.wish.com/merchant/58bfbe5878f875577ecbe953">https://www.wish.com/merchant/58bfbe5878f875577ecbe953</a>
66	<a href="https://www.wish.com/merchant/57d689d0cafd22103f3a6986">https://www.wish.com/merchant/57d689d0cafd22103f3a6986</a>
67	<a href="https://www.wish.com/merchant/53734013b9ee8451b2ebd157">https://www.wish.com/merchant/53734013b9ee8451b2ebd157</a>
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69	<a href="https://www.wish.com/merchant/53734105b9ee8451b5ebd02b">https://www.wish.com/merchant/53734105b9ee8451b5ebd02b</a>
70	<a href="https://www.wish.com/merchant/5a38f6cc8cf0ed0a18aeac33">https://www.wish.com/merchant/5a38f6cc8cf0ed0a18aeac33</a>
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