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

VALENTINO ROSSI,	
	Case No. 20-cv-4773
Plaintiff,)	Judge John Robert Blakey
v.)	Judge John Robert Diakey
· · ·)	
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 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, offering to sell and ship products into this Judicial District. "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, 932 (N.D. Ill. 2016). Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars, and, on information and belief, have sold products using infringing and counterfeit versions of Plaintiff's federally registered trademarks (the "VR | 46 Products"). See [9-1] at ¶ 12. In addition, Plaintiff's screenshot evidence, attached as "Exhibit 2" to [9-1], confirms that each Defendant's e-commerce store does stand ready, willing and able to ship its counterfeit goods to customers in Illinois. Id.; See also [10]–[15].

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 Product 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 Product 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
- 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 $VR \mid 46$ Trademark or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof that is not a genuine $VR \mid 46$ Product or not authorized by Plaintiff to be sold in connection with Plaintiff's $VR \mid 46$ 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., 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, 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, 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 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, 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, 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 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 "DQINTIAN 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 is 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: September 30, 2020

Entered:

John Robert Blakey

United States District Judge

Valentino Rossi v. The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A Hereto Case No. 20-cv-4773

SCHEDULE A

No.	Defendant Name / Alias
1	bqintian
2	zhangjian788029
3	easme
4	Mangcao
5	Taiyangstar
6	Bstdhgate07
7	liguo0054
8	lijian08
9	linnan0003
10	ladylbdcloth
11	trousseau
12	customteeplaza
13	lijian062
14	es11
15	es111
16	es22
17	es333
18	Es55
19	es66
20	wear3
21	wear5
22	gentlecasual
23	Just4urwear
24	prettyamazing
25	yiyeluochen
26	Bosshui666
27	Carandmoto
28	Motoshopping
29	newlife888
30	Topmoto
31	Bdauto
32	Sanjiaomeiflo
33	garters
34	nanmenstar
35	red2015

36	jack_shop1
37	ll_shop
38	diytee02
39	eyesonu
40	heijom
41	mong01
42	teetop02
43	Bstdhgate
44	shirtstar
45	teesshop
46	amesion65
47	amesion72
48	shop4ever
49	adidastee
50	alturasthreads
51	Apericots
52	auto_moto
53	ayintian
54	Beaucup
55	beidhgate07
56	Biangye
57	Burtom
58	cechen
59	chichengshanghai
60	clmoto998
61	Cluboutfit
62	cocomomo
63	customteepark
64	ddgxx
65	designbyhumans
66	dhivanka
67	Dingtrista
68	Diyteeplaza
69	diyteestore
70	dredcup
71	edward03
72	fastshipdirect
73	Feng668
74	firstchoicemedia
75	Foxracing
76	Fuyastore

77	Goods_queen
78	goodshirt
79	goodshirts201802
80	goodyuns
81	itsasurnamething
82	Jerseys_linda
83	jie14
84	jyb8888
85	lanfystore
86	locy
87	locy88
88	loungersofa
89	Louyu
90	Lougu Lovecar1
91	luxiaogangkaka
92	luxuryoutfit
93	lxr8888
94	micky_tees
95	mildeast
96	mumianflo
97	niumou
98	Nqingfeng
99	Paping
100	Pubao
101	qz2878193779
102	shirtcup
103	softwarekey
104	sukicare
105	supertshirts201801
106	supertshirts201806
107	supertshirts201810
108	teestyles
109	teesubway
110	teetreedesigns
111	temperamenttee
112	thorzhou
113	Tigerktm
114	tolina
115	tonethiny
116	Tshirthutzone
117	vanilla03
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118	Wangxiao587
119	workwell
120	xiaochupeiqi
121	Yamaha_store
122	Yaritsi
123	yg04tshirt
124	yifan_zhao
125	zch9988
126	shawn919
127	Yes1688
128	kuaigoubian
129	Shinyday
130	ikepeibaonecktie
131	zhougb
132	bcd3333
133	Yiri888
134	ztwz002
135	beachsandy
136	Brakeangela
137	comen
138	cutport
139	Cyhelmet
140	Dd005
141	dx_motorparts
142	elegant_dressstore
143	Fatumai518518
144	hermane
145	hotsuglasses2
146	Kaiyue608
147	kiko4
148	knite07
149	leviis
150	Lizardd
151	moveupstore
152	naixing
153	portnice
154	pretty05
155	quanquan2726
156	sd005
157	seven7moto
158	Shen8409

159	smoke_factory
160	sportbooth
161	superwe
162	Sweetdream1
163	Tbg0828
164	tophat6
165	xuelianguo
166	yejianfeng5
167	ylingnei
168	Zhaoning1004
169	acefairingskits
170	bikefairings
171	chris_moto_parts
172	mymotorfairings
173	sgmgmeng1
174	shopping2cheap
175	sportfairings02
176	weed2012
177	wynmoto
178	wynmoto_store
179	johnson6352
180	worldsale123
181	seandd
182	funny6631
183	Oak1ey168
184	Morales
185	Xymy797
186	beilejia20170707
187	Hanlley
188	baidu8
189	jtgmall

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57	https://www.dhgate.com/store/20293197
58	https://www.dhgate.com/store/20331360
59	https://www.dhgate.com/store/14497721
60	https://www.dhgate.com/wholesale/products/ff80808163eebc9d016444103acf7069.html
61	https://www.dhgate.com/store/21223724
62	https://www.dhgate.com/store/21082746
63	https://www.dhgate.com/store/21121397
64	https://www.dhgate.com/wholesale/products/ff80808165330753016560c323702e38.htm
65	https://www.dhgate.com/store/21133986
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67	https://www.dhgate.com/store/20495093
68	https://www.dhgate.com/store/21165247
69	https://www.dhgate.com/store/21113970
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73	https://www.dhgate.com/store/14497915
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76	https://www.dhgate.com/store/20299878
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84	https://www.dhgate.com/wholesale/products/ff8080815faf295f015fe2baf5af7a43.html
85	https://www.dhgate.com/store/21119401
86	https://www.dhgate.com/store/20438969
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88	https://www.dhgate.com/store/20336474
89	https://www.dhgate.com/store/20983668
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94	https://www.dhgate.com/store/21130012
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13 8	https://www.dhgate.com/store/21157120
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