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

EMOJI COMPANY GmbH,

Plaintiff,

Case No.: 20-cv-5377

Judge Marvin E. Aspen

v.

DIAOWANYINGYI1 et al.,

Defendants.

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on EMOJI COMPANY GmbH'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 EMOJI Trademarks (the "EMOJI 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

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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 EMOJI Trademarks are distinctive marks and registered with the U.S. Patent and Trademark Office on the Principal Register as U.S. Trademark Registration Nos. 4,868,832; 5,202,078 and 5,415,510 for the EMOJI marks, (2) Defendants are not licensed or authorized to use EMOJI Trademarks, and (3) Defendants' use of the EMOJI Trademarks are causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with EMOJI COMPANY GmbH. Furthermore, Defendants' continued and unauthorized use of the EMOJI 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.

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 preliminarily enjoined and restrained from:
 - a. using Plaintiff's EMOJI 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

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product that is not a genuine EMOJI Product or is not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks;

- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine EMOJI Product or other product produced by Plaintiff, that is not Plaintiff's or is not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's EMOJI 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 EMOJI Trademarks 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 EMOJI Trademarks 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 EMOJI 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 EMOJI Trademarks or any confusingly similar reproductions, counterfeit copies or colorable imitations thereof that is not a genuine EMOJI Product or is not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks.
- 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

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- 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 and 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 EMOJI 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 EMOJI Trademarks; 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 and DHgate, advertisers, Facebook, Internet Service Providers ("ISP"), web hosts, back-end service providers, web

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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,

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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 "DIAOWANYINGYI1 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: November 23, 2020

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Marvin E. Aspen U.S. District Court Judge

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SCHEDULE A

No.	Defendant Name / Alias
1	diaowanyingyi1
2	exquisite559
3	designer5555
4	Designer5556
5	Designer5777
6	excellentsupplier1
7	Factory_top
8	clio01
9	Dy_store
10	chang2018
11	changjing5
12	chenguihua
13	Chrisl
14	Chushu11
15	ck10
16	cleowallace
17	clothing_01
18	cool_jewelry
19	coulhunt
20	crazyducks
21	crownjewelry
22	Curlyfa
23	Cxk3
24	Cxk5
25	daliangzhou
26	danieltai
27	Designer7888
28	destination_3
29	dfm_jewelry
30	dhbong
31	dhcomcn
32	dhgatebeautyfactory
33	Diaowanyingyi3
34	dingjiayi
35	diy89
36	donet
37	Dream1124
38	Dyevey

39	east_mei
40	economic8
40	edasonmall
41 42	elena12
42	
43	Etsybuy
44	ez_e_baysz
43	factorysale8
40	fairypalace Falml
47	fashion6699
	Fashion995
49	
50	fashiongirls88
51	fashionladies2007
52	fazl
53	fengzh
54	ffkjhuer
55	fgjljewelry
56	fidget_spinners
57	charmsvalley
58	cheap_fine
59	chenxuandhgate02
60	childrenparadise
61	Chinaatoybfactory
62	cigmax
63	coolwheel
64	crazygirls88
65	crazyrockpunkhiphop
66	creativebar
67	cring002
68	david_leeds
69	desertrose
70	designer889
71	diannecklace
72	Dianz
73	Donglingshi
74	dream_one
75	duole
76	ecty
77	enenbao
78	etojewelry
79	Faone19

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90	fashion show 2019
80	fashion_show2018
81	fashionaa
82	fashionacces101
83	fashionpendant2017
84	fashionwithbeauty
85	feiyu004
86	fincek007
87	Dabrig01
88	egm318318
89	chenjin1451
90	China_smoke
91	Cicishopdh
92	cuefun
93	cujuflo
94	darling_home
95	derlu01
96	dhgate_8
97	Dhoneystore
98	Diaolan
99	dtysunny
100	durian0725
101	echootime
102	electron_dv
103	eonar88
104	Eshop2018
105	ewin24
106	eyeswellsummer
107	fan_store
108	Faone24
109	fashion89toy
110	fashiondress520
111	fashionwonderland
112	ferdan
113	Fightinglily
114	chanelbags
115	Dqhome
116	Chitobae
117	classycolor
118	club_life
119	Conglan
120	Cx325

121deniaiwo1314122dhgate_store2015123diyplant124dobest_factorys125doublexiaoling1994126dqbaby127drdre128dryaet129Emaker130Everyonemore131fashion_ishoes132fashion1218133fashion9leatherware134fashionstore08135fashionstore08136Feiteng004137fenxin138etamkend139faone20140eraymart141erayshop142enjoyhometime143factory3cstore144Chinamama	
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142enjoyhometime143factory3cstore	
143 factory3cstore	
144 Chinamama	
145 chinese_sun	
146 chineseboy8	
147 Daisy433	
148 dandankang	
149 dhgatetoysfactory	
150 dongliangmei	
151 dqqueen	
152 dream_high	
153 easy_deal_tech	
154 ebless130606	
155 eeant	
156 Electronisupermarket	
157 Exsports	
158 Fangfang889919	
159 Fashicone	
160 fashion_brand1688	
161 Do_bussiness_with	

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162	Fashion_with_you
163	Cindyyyyy
164	cl2019017
165	cn_home
166	daiqinghua007
167	dhgate_shops
168	dqtoys
169	dyf363636
170	edig
171	fbahelper
172	cheer0808
173	Chorsh
174	cinda01
175	Clothinght
176	dhwiner
177	dzuprighte
178	fashion_tops
179	Fenfang2020
180	dhgate_garden
181	dhgate_loves
182	dhgate_xiaoqiang
183	dhgatejiaju
184	dihai
185	dimao
186	dreamsky88
187	elenamin
188	douledd
189	emaid16
190	chinahiroko
191	djatqqq
192	e_emal
193	erin000
194	fashion_seller
195	chengdaphone07
196	chicfansn
197	cm2016
198	Coolshops
199	douglass
200	easefit
201	china_mugs
202	cndream
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203	cngreenwing
203	cngreenwing
204	diyinpao effeisthome
203	excellent life12
208	
	charm_style
208	cherylz chinawholesale998
209	
210	dh15879401986
211	fashion-angel
212	danni071926
213	enjoytheworld
214	dhgatepipe
215	Dunkin
216	designersweatpants
217	Fendingboy
218	chen0513
219	chengdaphone06
220	chrils
221	chun0318
222	cocoart2016
223	color1234567
224	Compressionshirt
225	copy02
226	cupwater
227	cutemerry
228	dakang
229	Davidbongs420
230	Daydaylife
231	dejavu_yan
232	dh370468917
233	Dhbabyh
234	dhhome001
235	Diaowanyingyi4
236	diaowanyingyi5
237	dimis
238	dl_industrial
239	dracaena
240	dytowel
241	e_popshop
242	e_store2015
243	eaof

244	Efanprinting
245	egocig
246	electrishop
247	electronicshop1
248	Emaccessories
249	emaly
250	Emmayu
251	enjoyweekend
252	esw_house
253	Etoceramics
254	evip
255	excellenceonline
256	faone22
257	Fashion_001
258	fashion_god
259	fashionshowgoods
260	fashluck
261	fcma6006
262	fenglin_joy

No	Defendants Online Marketplace
1	https://www.dhgate.com/store/21479302
2	https://www.dhgate.com/store/21529315
3	https://www.dhgate.com/wholesale/products/ff808081717bc8c70171be9a00d13eb8.ht ml
4	https://www.dhgate.com/wholesale/products/ff808081713aeab40171be9c684d30c3.ht ml
5	https://www.dhgate.com/wholesale/products/ff808081713aeaba0171be7b876912fa.ht ml
6	https://www.dhgate.com/store/21534297
7	https://www.dhgate.com/store/19887228
8	https://www.dhgate.com/store/21525206
9	https://www.dhgate.com/store/21455280
10	https://www.dhgate.com/store/20986777
11	https://www.dhgate.com/store/21195810
12	https://www.dhgate.com/store/21056793
13	https://www.dhgate.com/store/20270858
14	https://www.dhgate.com/store/21043921
15	https://www.dhgate.com/store/20451472

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56	https://www.dhgate.com/store/20683661
57	https://www.dhgate.com/store/21040145
58	https://www.dhgate.com/store/20397207
59	https://www.dhgate.com/store/21152583
60	https://www.dhgate.com/store/20742316
61	https://www.dhgate.com/store/21435446
62	https://www.dhgate.com/store/21125416
63	https://www.dhgate.com/store/20120445
64	https://www.dhgate.com/store/19747449
65	https://www.dhgate.com/store/21283224
66	https://www.dhgate.com/store/14152651
67	https://www.dhgate.com/store/21064205
68	https://www.dhgate.com/store/20196374
69	https://www.dhgate.com/store/20713426
70	https://www.dhgate.com/store/21054433
71	https://www.dhgate.com/store/21208142
72	https://www.dhgate.com/store/14775929
73	https://www.dhgate.com/store/21095779
74	https://www.dhgate.com/store/20777761
75	https://www.dhgate.com/store/16648454
76	https://www.dhgate.com/store/20377954
77	https://www.dhgate.com/store/21072003
78	https://www.dhgate.com/store/21298098
79	https://www.dhgate.com/wholesale/products/ff80808171e8de24017202d71c525430.ht
80	https://www.dhgate.com/store/21051640
81	https://www.dhgate.com/store/20909037
82	https://www.dhgate.com/store/21020318
83	https://www.dhgate.com/store/20569282
84	https://www.dhgate.com/store/19728674
85	https://www.dhgate.com/store/20733476
86	https://www.dhgate.com/store/20204179
87	https://www.dhgate.com/store/21479295
88	https://www.dhgate.com/wholesale/products/ff808081713ae81c01715e1e086c14e6.ht ml
89	https://www.dhgate.com/store/20611039
90	https://www.dhgate.com/store/20023446
91	https://www.dhgate.com/store/20719167
92	https://www.dhgate.com/store/21203592
93	https://www.dhgate.com/store/21078975
94	https://www.dhgate.com/store/21201496
95	https://www.dugate.com/store/21201490 https://www.dugate.com/store/21032563
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96 https://www.dhgate.com/store/20760170 97 https://www.dhgate.com/store/20277592 98 https://www.dhgate.com/store/19987907 99 https://www.dhgate.com/store/20801127 100 https://www.dhgate.com/store/20919116 101 https://www.dhgate.com/store/20919116 102 https://www.dhgate.com/store/20912069 103 https://www.dhgate.com/store/20912069 104 https://www.dhgate.com/store/19816918 105 https://www.dhgate.com/store/14772852 106 https://www.dhgate.com/store/14277828 107 https://www.dhgate.com/store/20152314	
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