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

EMOJI COMPANY GmbH,

Plaintiff,

v.

ORVIESCHINA et al.,

Defendants.

Case No.: 20-cv-5699

Judge Matthew F. Kennelly

## 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

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:

- 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

- 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

- 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

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 five (5) 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 "ORVIESCHINA 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,

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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: October 27, 2020

U.S. District Court Judge

## SCHEDULE A

No.	Defendant Name / Alias
1	Orvieschina
2	orvieschina005
3	Monday_1
4	monday_5
5	nbabuyer
6	north_stone12
7	palm_07
8	off_store1
9	orvies1
10	orvies3
11	orvies4
12	orvieschina008
13	Orvieschina009
14	palm_03
15	palm_04
16	Palm_store01
17	Palm006
18	mandarin18
19	melome
20	moan2017
21	nbone1
22	Necklacebracelet
23	Nectarine99
24	newhappystore
25	nicegoods
26	nincheng
27	ninjaturtles
28	nyk3
29	nyk6
30	Oem_store
31	ogfashion
32	omellyfashion
33	onlove
34	oriental123
35	outlet10
36	overseaswholesale
37	panshengjewelry
38	perfect_deal

39	perfect_trade
40	pickled
41	Pingwang1
42	Pinksee6
43	Pulchritudinous
44	Qiansuning1
45	Qiansuning2
46	qiansuning8
47	qiugaoliang
48	redjune
49	ried
50	rita2019
51	Maleclothinggd
52	mandystore2009
53	Maternalcare
54	mayflower1
55	memory_love
56	meow_sports
57	mingshoe001
58	multibag_factory
59	Neideng
60	nice_02
61	niceshopp
62	palexxx
63	pankeey
64	paradise03
65	paradise11
66	Patience_168
67	pinkfrog
68	pinknice
69	pinkvvv
70	potala_superkids
71	potatoo
72	protechs
73	qiansuning88
74	Qiansuning888
75	rising_star
76	roseyy
77	rrfs006
78	mamazemg
79	marki

80	mavinna
	mayjune
81	mehome
82	mhz87
83	miao_new
84	mixsmoking
85	moigo
86	molotok
87	mtwholesale
88	Naigou
89	nicel_co_ltd
90	oopp
91	Oppodo
92	orangebeddings
93	pantine01
94	papazeng
95	prettystore11
96	prime_06
97	prodecoration
98	prowrudder
99	pzp630198827
100	Qigrif
101	qiqihaercc
102	qiyuan10
103	Quenya03_home
104	qwonly_shop
105	michael8688
106	New_trends
107	monogrammed
108	qjs66325415
109	mamashengxin6
110	milulu
111	minggame001
112	monday_2
113	Monlovebaby
114	Navyjewelry
115	novafashion
116	olife
117	Olympia
118	perfect20170505
119	pop_toys
120	pu10

121	myddinastation
	puddingstation
122	Qiansuning666
123	qiansuning8888
124	Qwer1991
125	relove
126	ruilijewelry888
127	qianancompanys
128	qianandhgate
129	qiananshopping
130	qiananstore
131	manshy
132	min123
133	mitoy
134	mominusa
135	monimart
136	nakiki
137	newmanhome
138	newtoy999
139	niceshopping18
140	Okbrand
141	peopleworld
142	phone_tele
143	pretty05
144	qz4362
145	rose_liu
146	off_6
147	Palm_09
148	Palm_11
149	north_14
150	off_7
151	milkbread
152	Mm008
153	Matilian
154	mimang02
155	mixed
156	moussy
157	nagogo
158	Off_white666
159	off007
160	palm_01
161	qw002

1.00	District
162	Richina
163	melodyqueen6
164	meow_householdes
165	miaifamily
166	mituhome
167	mr_auto
168	nature_angel
169	Noosa2017
170	onefashion3
171	pillowcases
172	pillowcover
173	rainbowman88
174	Mariowin
175	mingjing02
176	Narciss
177	nestorlong
178	oasisfestival
179	orange326
180	Potala_partysupply
181	Qiansuning3
182	qiansuning66
183	reasonable11
184	Meledy
185	Nancy007lhy
186	Okbaby
187	party2000
188	perfect369
189	pleasure188
190	roohua
191	mamatoy
192	megatron
193	Motaiok
194	mygogo
195	ok767
196	onward_industrial
197	rudelf
198	nice_01
199	nuoying
200	pingwang4
201	pvflymk1
202	qingtang2

203	noav
203	noey oem_factory_cn
205	· · · · · · · · · · · · · · · · · · ·
203	opal Partnership
207	phoneacc_shop
207	Mask01
	melee
209	
210	ouyang002
211	phcqkmh redstar080
213	Mbappe1108
214	Mx2019jerseys
215	Mamba2020
216	melody2041
217	Mensdesignerclothing
218	meow_jay
219	metalpaintingart
220	miaotang
221	micacai
222	michalle
223	mini_world
224	miniatur
225	Mj_covenant
226	Motorcyclescar
227	nasturtium
228	nevada
229	newstore2018
230	newwholesalestores
231	Nice_03
232	nick205x
233	Offmop
234	offworld
235	Ohyes
236	opec
237	Ordermix
238	Paladin886
239	Patagoniamen
240	peter0
241	pinkaboo_items
242	pitt2016
243	popular_dhgate

244	prettypersuasion
245	prettyrose
246	Ptdiy
247	ptdiy1
248	ptdiy2
249	pure_fashion
250	qinglong998
251	qq_dh
252	Qq8598088
253	Qq894954385
254	qualitypins
255	qweeonlin
256	rainbowlily2014
257	ramondcao
258	Remembermestore
259	Rh_baby
260	rhinestonetransfer
261	roadsun
262	rosebox
263	royalmart
264	ruby_one

No	Defendants Online Marketplace
1	https://www.dhgate.com/store/21449565
2	https://www.dhgate.com/store/21469766
3	https://www.dhgate.com/store/21427341
4	https://www.dhgate.com/store/21504733
5	https://www.dhgate.com/store/21187841
6	https://www.dhgate.com/store/21431556
7	https://www.dhgate.com/store/21523092
8	https://www.dhgate.com/store/21471184
9	https://www.dhgate.com/store/21500738
10	https://www.dhgate.com/store/21502089
11	https://www.dhgate.com/store/21502094
12	https://www.dhgate.com/store/21477886
13	https://www.dhgate.com/store/21478218
14	https://www.dhgate.com/store/21522879
15	https://www.dhgate.com/store/21522882
16	https://www.dhgate.com/store/21501743

17	https://www.dhgate.com/store/21518438
18	https://www.dhgate.com/store/21071611
19	https://www.dhgate.com/store/21136368
20	https://www.dhgate.com/store/20769365
21	https://www.dhgate.com/store/21137833
22	https://www.dhgate.com/store/20948694
23	https://www.dhgate.com/store/21071621
24	https://www.dhgate.com/store/20336553
25	https://www.dhgate.com/store/21330845
26	https://www.dhgate.com/store/20331028
27	https://www.dhgate.com/store/19903081
28	https://www.dhgate.com/store/20444295
29	https://www.dhgate.com/store/20450316
30	https://www.dhgate.com/store/20949853
31	https://www.dhgate.com/store/21100271
32	https://www.dhgate.com/store/20706412
33	https://www.dhgate.com/store/21019186
34	https://www.dhgate.com/store/21045436
35	https://www.dhgate.com/store/20451474
36	https://www.dhgate.com/store/20503178
37	https://www.dhgate.com/store/21265259
38	https://www.dhgate.com/store/21332285
39	https://www.dhgate.com/store/21332569
40	https://www.dhgate.com/store/20625692
41	https://www.dhgate.com/store/21130861
42	https://www.dhgate.com/store/21211225
43	https://www.dhgate.com/store/19967881
44	https://www.dhgate.com/store/21479258
45	https://www.dhgate.com/store/21478990
46	https://www.dhgate.com/store/21479001
47	https://www.dhgate.com/store/21107281
48	https://www.dhgate.com/store/20625982
49	https://www.dhgate.com/store/20753628
50	https://www.dhgate.com/store/21204868
51	https://www.dhgate.com/store/21088153
52	https://www.dhgate.com/store/20215441
53	https://www.dhgate.com/store/20983935
54	https://www.dhgate.com/store/20755046
55	https://www.dhgate.com/store/20338815
56	https://www.dhgate.com/store/20990295
57	https://www.dhgate.com/store/21067919

58         https://www.dhgate.com/store/21079565           59         https://www.dhgate.com/store/20325852           60         https://www.dhgate.com/store/21504492           61         https://www.dhgate.com/store/21073676           62         https://www.dhgate.com/store/2032975           63         https://www.dhgate.com/store/2032975           64         https://www.dhgate.com/store/2032975           65         https://www.dhgate.com/store/20330179           66         https://www.dhgate.com/store/21204899           67         https://www.dhgate.com/store/21204989           68         https://www.dhgate.com/store/2104989           69         https://www.dhgate.com/store/2109324490           70         https://www.dhgate.com/store/21093692           71         https://www.dhgate.com/store/210950           72         https://www.dhgate.com/store/21479002           73         https://www.dhgate.com/store/21479004           74         https://www.dhgate.com/store/2180666           75         https://www.dhgate.com/store/218482           78         https://www.dhgate.com/store/2185482           79         https://www.dhgate.com/store/2185482           80         https://www.dhgate.com/store/218559           81         https://www.dhgate.com/store/21852158 <th>50</th> <th>https://www.db.cote.com/stons/21070565</th>	50	https://www.db.cote.com/stons/21070565
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258 https://www.dhgate.com/store/20683120	256	
1 2	257	https://www.dhgate.com/store/20413556
259 https://www.dhgate.com/store/19958013	258	https://www.dhgate.com/store/20683120
	259	https://www.dhgate.com/store/19958013

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260	https://www.dhgate.com/store/20073451
261	https://www.dhgate.com/store/21156990
262	https://www.dhgate.com/store/21346327
263	https://www.dhgate.com/store/21438292
264	https://www.dhgate.com/store/20141318