

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

GRUMPY CAT LIMITED,	)	
	)	Case No. 21-cv-238
Plaintiff,	)	
	)	Judge John Robert Blakey
v.	)	
	)	
THE INDIVIDUALS, CORPORATIONS,	)	
LIMITED LIABILITY COMPANIES,	)	
PARTNERSHIPS AND	)	
UNINCORPORATED ASSOCIATIONS	)	
IDENTIFIED ON SCHEDULE A HERETO,	)	
	)	
Defendants.	)	

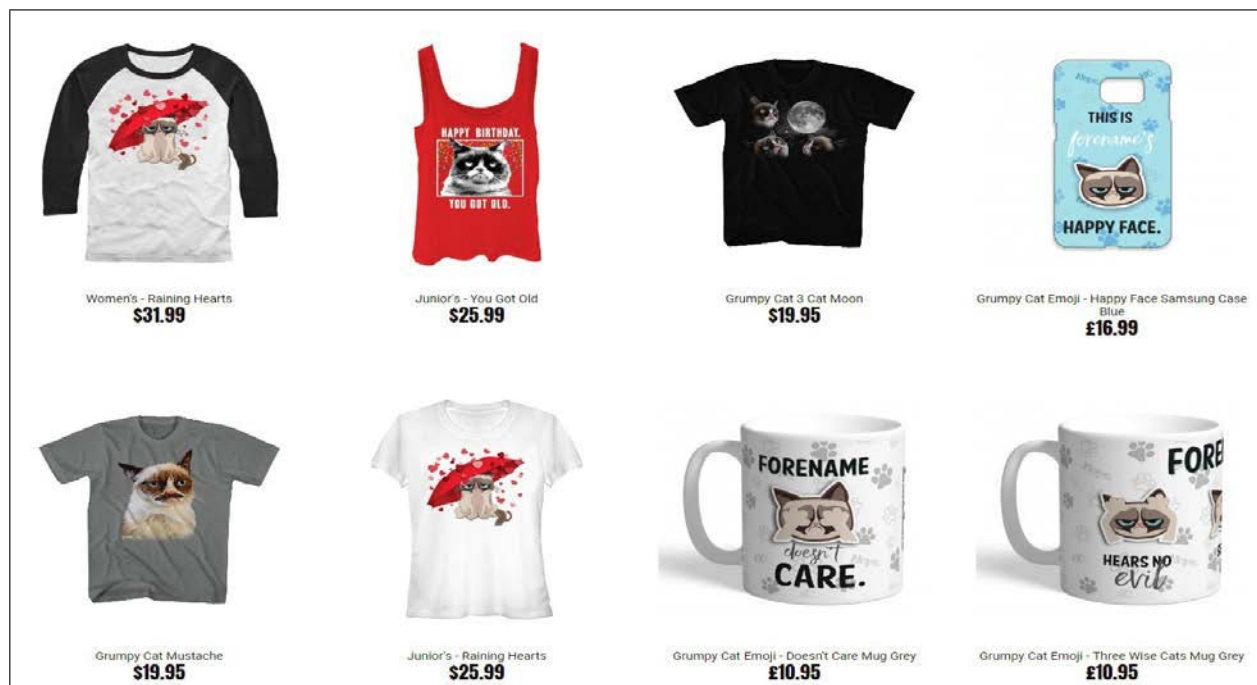
**SEALED TEMPORARY RESTRAINING ORDER**

THIS CAUSE coming before the Court on Plaintiff's *Ex Parte* Motion for Entry of a Temporary Restraining Order, including a Temporary Injunction, a Temporary Transfer of the Defendant Domain Names, a Temporary Asset Restraint, Expedited Discovery, and Service of Process by Email and/or Electronic Publication (the "Ex Parte Motion") against the defendants identified in Schedule A to the Complaint and attached hereto (collectively, the "Defendants") and using at least the domain names identified in Schedule A (the "Defendant Domain Names") and the online marketplace accounts identified in Schedule A (the "Online Marketplace Accounts"), and this Court having considered the evidence before it hereby GRANTS Plaintiff's *Ex Parte* Motion [8] in its entirety.

This Court further finds that it has personal jurisdiction over the Defendants because 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. 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 and do purchase products bearing counterfeit versions of U.S. Trademark Registration Nos. 4,907,212, 5,516,378, 4,820,434, 4,417,549, 4,672,289, 5,073,528, 4,527,097, 4,930,286 and 4,907,213 for the GRUMPY CAT Trademarks and Plaintiff's registered copyrights VA 1-911-607, VA 1-882-406, VA 1-963-544, VA 1-996-074, VA 2-023-702, VA 2-111-353, VA 2-134-675, VA 1-886-880, VA 1-966-135, VA 1-941-449, VA 2-008-316, VA 1-962-679, TX 8-617-793, VA 1-939-990, VA 1-899-887, VA 1-901-628, VA 1-859-983, VA 1-849-042, VA 1-849-044 and VA 1-849-043 for the GRUMPY CAT Copyrights. See below.

<https://www.grumpycats.com/shop>



This Court also finds that issuing this Order without notice pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure is appropriate because Plaintiff has presented specific facts in the Declaration of Bryan B. Bundesen and the Declaration of Michael A. Hierl and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before

the adverse party can be heard in opposition. Specifically, in the absence of an *ex parte* Order, Defendants could and likely would modify registration data and content, change hosts, redirect traffic to other websites in their control, and move any assets from accounts in U.S.-based financial institutions, including eBay and DHgate accounts, to offshore accounts. As other courts have recognized, proceedings against those who deliberately traffic in counterfeit merchandise are often useless if notice is given to the adverse party.

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 GRUMPY CAT Trademarks and Copyrights in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any products that are not genuine GRUMPY CAT products or are not authorized by Plaintiff to be sold in connection with Plaintiff's GRUMPY CAT Trademarks and Copyrights;
  - b. passing off, inducing, or enabling others to sell or pass off any products as genuine GRUMPY CAT products or any other products produced by Plaintiff, that are not Plaintiff's or are not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's GRUMPY CAT Trademarks and Copyrights;

- 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 GRUMPY CAT Trademarks and Copyrights and damaging Plaintiff'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 Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear any of Plaintiff's GRUMPY CAT Trademarks and Copyrights;
- f. 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 or is the means by which Defendants could continue to sell Counterfeit GRUMPY CAT products; and
- g. 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 GRUMPY CAT Trademarks and Copyrights that are not genuine GRUMPY CAT products or are not authorized by Plaintiff to be sold in connection with Plaintiff's GRUMPY CAT Trademarks and Copyrights.

2. 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 five (5) 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.
3. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as iOffer, eBay 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 five (5) 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 GRUMPY CAT Trademarks and Copyrights, 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 GRUMPY CAT Trademarks and Copyrights; and
  - c. take all steps necessary to prevent links to the Defendant Domain Names identified in Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Domain Names from any search index.
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, eBay 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 eBay and 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, eBay and DHgate 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. eBay 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 and related to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any eBay accounts connected to and related to the information listed in Schedule A to the Complaint; and
  - b. Restrain and enjoin any such accounts or funds 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 and related to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any DHgate accounts connected to and related to the information listed in Schedule A to the Complaint; and
  - b. Restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
8. 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 five (5) 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 to the Complaint; 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.
9. 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 to the Complaint 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 "dafengcp-0 and all other Defendants identified in 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.

10. Plaintiff's Complaint, Schedule A to the Complaint, and this Order shall remain sealed until Defendants' financial accounts are restrained. Plaintiff shall file unsealed versions of the Complaint, Schedule A to the Complaint, and this Order using the CM/ECF system prior to the expiration of this Order. Plaintiff shall deposit with the Court Ten Thousand Dollars (\$10,000.00), either cash, cashier's check or surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of a wrongful restraint hereunder.
11. 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.

This Temporary Restraining Order without notice is entered on January 28, 2021 at 10:00 A.M., and shall remain in effect for fourteen (14) days.

Dated: January 28, 2021

Entered:

A handwritten signature in black ink, appearing to read "John Blakey", written over a horizontal line.

John Robert Blakey  
United States District Judge

**SCHEDULE A**

<b>No.</b>	<b>Defendant Name / Alias</b>
1	dafengcp-0
2	finesp2
3	hesxi0
4	linajian0
5	liuyah77
6	rentg7
7	sapany-57
8	thiratho_0
9	Anzhuhua
10	auto_motorcycle_01
11	banwanyue7
12	Bincheng1
13	Cat11cat
14	Catlam1113
15	cngreenwing
16	Dhbabyh
17	Esw_home
18	eyesonu
19	fashionalleader
20	gaobei07
21	Highqualit04
22	Highqualit06
23	Highqualit07
24	Highqualit09
25	Highqualit10
26	Highqualityok2
27	Home_bar
28	Home_goods
29	Hoya_automobile
30	IIIIIIIIIIIIIIIIIIII
31	Joymi
32	Kongyuan4
33	Megatron
34	mercedes1
35	Qian002
36	Raoying8888
37	Raymonu
38	santi

39	sarah_dhgate_07
40	Tshirtsshop
41	Verynicegirl
42	Wanghongmei8888
43	Wangxiaofeng806
44	Xiaomei886809
45	Yuanjiu168
46	yubin11
47	yubin8
48	ayhiavbl182604
49	bestlove999
50	blasbluz
51	braverfishermen
52	ch5jk6
53	chinadongstore_7886
54	colorful*case
55	cool8ring
56	dailywarecenter
57	design_planet
58	dhhui7
59	digital2018
60	digitalfromchina
61	ebuytrade
62	elegant1111
63	falas.khula
64	fengp8
65	firpras0
66	gophly
67	greennjungle
68	hdkjk9
69	hdvn2794
70	hi-world
71	hobbyforsure
72	hot-sell7
73	hpe_86
74	hugee6
75	hulushop2010
76	jewelry-201287
77	jiech2
78	jutange_7
79	lovesoutstore
80	magetave2018
81	mayblcha-0

82	mirza.t_90
83	mole-45
84	mycyk2
85	okmart88
86	pangluobo
87	puyef5
88	qingfengtop5
89	rainbowhong2012
90	randegreendesign
91	relaxtree
92	rueanmaha0
93	salvador.norsar2018
94	shevalues
95	shuangyan1989
96	smart2019
97	sunnytechcity
98	sunxhu76
99	tannainai887
100	tanyuanjiao20
101	tattoofromchina
102	tolulu99
103	topbeauty-2008
104	topbuy-777
105	totoperate
106	ur_topshop
107	vibesprints
108	wyunlon0
109	xiaotan2017-7
110	xiqiyangyang0605
111	yanfeshe
112	yankey87
113	yea2ch
114	ymjzwe
115	amesion30
116	amesion85
117	amesion95
118	ansmile
119	aone123
120	Aonepatch
121	Aozhouqie
122	Applebbyy
123	Aringstore
124	artmuz88

125	banwanyue2
126	besttshirts201809
127	besttshirts201810
128	biecup
129	Bigbangcx
130	Bling_world
131	Blinkblink
132	Caisemao07
133	Caley
134	calvinkleinteeshirt
135	chanelteeshirt
136	Cindyyyyyy
137	Cls6688521
138	cocoart2016
139	Colorful12345
140	Copy02
141	Cosmose
142	creativearts
143	Croftte
144	customtshirt201802
145	customtshirt201805
146	cyon2017
147	designbyhumans
148	designlife
149	Dfm_jewelry
150	Dh_express
151	Dh_plaza
152	Dhga01
153	diytshirt27
154	Douglass
155	Eforcar
156	Esw_home2
157	excellent82
158	Factory_discount
159	Family_mall
160	Fanyumaoyi03
161	Father_price
162	fmshirt
163	fullcolor
164	Garden01
165	geckotees
166	Gkdgarden
167	Greenwing168

168	Hai07
169	Healthy_living
170	Highqualit05
171	homegarden
172	Honestar_ltd
173	Honorsmoke
174	hopestar168
175	Household_shop4
176	Hungrydhgate
177	Igo_world
178	insightlook
179	Iped2016
180	japan_store
181	Jcwatches
182	jerry01
183	jerry111
184	Jessie66
185	Jingyan006
186	Kaiyue608
187	Ken12cx
188	kfcmantees
189	Lazymax
190	Lightcx
191	liguo0032
192	lijian062
193	lijian13
194	lijian85
195	liuyanggarden
196	lovedreamstore
197	lucycloth
198	luscup
199	Magic_living
200	meicloth
201	micky_tees
202	microplush
203	microplushtoy
204	Mrsugarstore
205	Mvptshirt
206	nanlystore
207	Olgar
208	peaceg
209	Perfumeliang
210	Pretty070

211	Redline
212	samclothing
213	Sell_globally
214	shitan10
215	Shoptshirt
216	simida265
217	Sophine11
218	Store2014
219	Stylemixxuk
220	supermantees
221	sweety520house
222	teecenter
223	teele31
224	temperamenttee
225	textualteeshirt
226	Tina320
227	Topteam
228	Toyguiyang
229	Ture_beauty
230	twicecup
231	Vanscup
232	Venus2013
233	vineger
234	walltshirt02
235	wattystore
236	wayslestore
237	Wetophat
238	whitecup
239	Wholesale_bags2017
240	Willwangtrade888
241	Wish_shopping
242	wrapfairy
243	X56343363
244	Xm_home_garden
245	yubin08
246	yzlwatchfine
247	zhihongli123
248	Zhuojongguang
249	Zw_network

<b>No</b>	<b>Defendants Online Marketplace</b>
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1	<a href="https://www.ebay.com/usr/dafengcp-0">https://www.ebay.com/usr/dafengcp-0</a>
2	<a href="https://www.ebay.com/usr/finesp2">https://www.ebay.com/usr/finesp2</a>
3	<a href="https://www.ebay.com/usr/hesxi0">https://www.ebay.com/usr/hesxi0</a>
4	<a href="https://www.ebay.com/usr/linajian0">https://www.ebay.com/usr/linajian0</a>
5	<a href="https://www.ebay.com/usr/liuyah77">https://www.ebay.com/usr/liuyah77</a>
6	<a href="https://www.ebay.com/usr/rentg7">https://www.ebay.com/usr/rentg7</a>
7	<a href="https://www.ebay.com/usr/sapany-57">https://www.ebay.com/usr/sapany-57</a>
8	<a href="https://www.ebay.com/usr/thiratho_0">https://www.ebay.com/usr/thiratho_0</a>
9	<a href="https://www.dhgate.com/store/20061376">https://www.dhgate.com/store/20061376</a>
10	<a href="https://www.dhgate.com/store/21474337">https://www.dhgate.com/store/21474337</a>
11	<a href="https://www.dhgate.com/wholesale/products/ff808081657b252601658d9d608d37bd.html">https://www.dhgate.com/wholesale/products/ff808081657b252601658d9d608d37bd.html</a>
12	<a href="https://www.dhgate.com/wholesale/products/ff80808165e7d16701664d6d39b56447.html">https://www.dhgate.com/wholesale/products/ff80808165e7d16701664d6d39b56447.html</a>
13	<a href="https://www.dhgate.com/store/20104380">https://www.dhgate.com/store/20104380</a>
14	<a href="https://www.dhgate.com/store/19726975">https://www.dhgate.com/store/19726975</a>
15	<a href="https://www.dhgate.com/store/19987308">https://www.dhgate.com/store/19987308</a>
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28	<a href="https://www.dhgate.com/store/21065573">https://www.dhgate.com/store/21065573</a>
29	<a href="https://www.dhgate.com/store/21292320">https://www.dhgate.com/store/21292320</a>
30	<a href="https://www.dhgate.com/store/20689964">https://www.dhgate.com/store/20689964</a>
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35	<a href="https://www.dhgate.com/store/21554770">https://www.dhgate.com/store/21554770</a>
36	<a href="https://www.dhgate.com/store/21259559">https://www.dhgate.com/store/21259559</a>
37	<a href="https://www.dhgate.com/store/20291429">https://www.dhgate.com/store/20291429</a>
38	<a href="https://www.dhgate.com/store/14770997">https://www.dhgate.com/store/14770997</a>
39	<a href="https://www.dhgate.com/wholesale/products/ff8080817106f3b401711787f6e256b6.html">https://www.dhgate.com/wholesale/products/ff8080817106f3b401711787f6e256b6.html</a>
40	<a href="https://www.dhgate.com/store/20768565">https://www.dhgate.com/store/20768565</a>
41	<a href="https://www.dhgate.com/store/21164496">https://www.dhgate.com/store/21164496</a>
42	<a href="https://www.dhgate.com/store/21259675">https://www.dhgate.com/store/21259675</a>
43	<a href="https://www.dhgate.com/store/21259671">https://www.dhgate.com/store/21259671</a>

44	<a href="https://www.dhgate.com/store/21259555">https://www.dhgate.com/store/21259555</a>
45	<a href="https://www.dhgate.com/store/14401283">https://www.dhgate.com/store/14401283</a>
46	<a href="https://www.dhgate.com/wholesale/products/ff8080816773e12001677905764f48a6.html">https://www.dhgate.com/wholesale/products/ff8080816773e12001677905764f48a6.html</a>
47	<a href="https://www.dhgate.com/wholesale/products/ff8080816773e12501677902ac46494f.html">https://www.dhgate.com/wholesale/products/ff8080816773e12501677902ac46494f.html</a>
48	<a href="https://www.ebay.com/usr/ayhiavbl182604">https://www.ebay.com/usr/ayhiavbl182604</a>
49	<a href="https://www.ebay.com/usr/bestlove999">https://www.ebay.com/usr/bestlove999</a>
50	<a href="https://www.ebay.com/usr/blasbluz">https://www.ebay.com/usr/blasbluz</a>
51	<a href="https://www.ebay.com/usr/braverfishermen">https://www.ebay.com/usr/braverfishermen</a>
52	<a href="https://www.ebay.com/usr/ch5jk6">https://www.ebay.com/usr/ch5jk6</a>
53	<a href="https://www.ebay.com/usr/chinadongstore_7886">https://www.ebay.com/usr/chinadongstore_7886</a>
54	<a href="https://www.ebay.com/usr/colorful*case">https://www.ebay.com/usr/colorful*case</a>
55	<a href="https://www.ebay.com/usr/cool8ring">https://www.ebay.com/usr/cool8ring</a>
56	<a href="https://www.ebay.com/usr/dailywarecenter">https://www.ebay.com/usr/dailywarecenter</a>
57	<a href="https://www.ebay.com/usr/design_planet">https://www.ebay.com/usr/design_planet</a>
58	<a href="https://www.ebay.com/usr/dhhui7">https://www.ebay.com/usr/dhhui7</a>
59	<a href="https://www.ebay.com/usr/digital2018">https://www.ebay.com/usr/digital2018</a>
60	<a href="https://www.ebay.com/usr/digitalfromchina">https://www.ebay.com/usr/digitalfromchina</a>
61	<a href="https://www.ebay.com/usr/ebuytrade">https://www.ebay.com/usr/ebuytrade</a>
62	<a href="https://www.ebay.com/usr/elegant1111">https://www.ebay.com/usr/elegant1111</a>
63	<a href="https://www.ebay.com/usr/falas.khula">https://www.ebay.com/usr/falas.khula</a>
64	<a href="https://www.ebay.com/usr/fengp8">https://www.ebay.com/usr/fengp8</a>
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247	<a href="https://www.dhgate.com/store/21005923">https://www.dhgate.com/store/21005923</a>
248	<a href="https://www.dhgate.com/store/20990332">https://www.dhgate.com/store/20990332</a>
249	<a href="https://www.dhgate.com/store/20288074">https://www.dhgate.com/store/20288074</a>