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21 CV 04312

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

MOONBUG ENTERTAINMENT LIMITED,

Plaintiff

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138 STORE, 4EVER KEEP REAL STORE, ANHUI PRIME TECHNOLOGY CO., LTD, RON.VE.XIN ANHUL INTERNATIONAL TRADE CO., LTD., ANIME ZONE STORE, ANIMECOLLECTION STORE, AVEZANO BACKDROP STORE, BABY K PARTY STORE, BABY PINK STORE, BABY TOY WORLD STORE. **BABYSUNHINE0305** STORE. BACKGROUND STORE, BE FUNNY PARTY STORE, BEETOY TOY STORE, BELLY TOY STORE, BENGBU SWAN GIFTS CO., LTD., **BEST-MOTHER** & **BABY** STORE, **BRATSWEETIS** STORE. **BRAVE** NEWWORLD STORE, **BRILLIANT** CHEERFUL LIFE STORE, BRILLIANT FUN PARTY STORE, BRILLIANT PARTY LIFE **BRILLIANT** STORE, **PARTY** STORE, CHILDREN SWEET HOME, CHRISTINEBEST STORE, CITY OF STARS STORE, COLA PARTY STORE, COOL-KIDS STORE. COSFANS COSTUMES STORE, COZY PARTY STORE, COZYDOG STORE. **CRYSTAL** TECHNOLOGY, CYML PARTY STORE, DAVID PARTY STORE, DAYOFSUGAR STORE, DECORATIVE BALLOONS STORE, Civil Case No.:

- PROPOSED |

1) TEMPORARY RESTRAINING
ORDER; 2) ORDER
RESTRAINING MERCHANT
STOREFRONTS AND
DEFENDANTS' ASSETS WITH
THE FINANCIAL INSTITUTIONS;
3) ORDER TO SHOW CAUSE
WHY A PRELIMINARY
INJUNCTION SHOULD NOT
ISSUE; 4) ORDER AUTHORIZING
BIFURCATED AND
ALTERNATIVE SERVICE; AND 5)
ORDER AUTHORIZING
EXPEDITED DISCOVERY

FILED UNDER SEAL

DHSM TOY STORE, DONGGUAN CHASHAN JIYE TOYS & GIFTS FACTORY, DONGGUAN HUAOUN TECHNOLOGY CO., LTD.. **ELECTRONIC** DONGGUAN NUOSHENG TECHNOLOGY, DONGGUAN NUOYI TOYS CO., LTD., DONGGUAN RUI TENG GIFT CO., DONGGUAN **SHUANGYUAN** CO., LTD., DREAMS GARMENTS POSSIBLE STORE, DULABABY STORE, ENJOYPARTY STORE, ESTRELLA STORE, F102 STORE, FAIRY TALE WORLD FRIST, FEMAILY STORE, FENGCAI TRADING (SHENZHEN) CO., LTD., FOURTRY STORE, FREE MARKET CO., LTD, FUTURE STARS PLUSH STORE, FUZHOU NICROLANDEE ARTS & CRAFT CO., LTD., FUZHOU PARTYCOOL TRADING CO., LTD., FUZHOU PARTYPLACE TRADING CO., LTD., GTT11 STORE, GUANGZHOU GONGYUCHENG TRADING CO., LTD., HAEE TOY STORE, HAI XIN STORE, HANGZHOU EASTERNHOPE ARTS & CRAFTS CO., LTD., HELLO BALLOONS, HENAN DIRIVER TRADING LTD., INLAND PARTY STORE. INMEMORY OFFICIAL STORE, INTRIGUING STORE, JIANGSU DINGHONG IMPORT AND EXPORT CO., LTD., JIANGXI YUNZHOU CLOTHING CO., LTD., JINHUA DARREN TRADING CO., LTD., JJ DROP SHOPPIG STORE, JOYTIMES STORE, JUJUBETREE STORE, KIDS FUNNY STORE, KOKOER PARTY STORE, LAMIANWANZI STORE, LET'S PARTY STORE, LIANYUNGANG HONGWEN TOYS CO., LTD., LOVE PARTY STORE, LOVEMYLIFE STORE, MAGIC CHILDREN WORLD STORE, MOLUTIAN OFFICIAL STORE, MY BALLOONS STORE, DAY TOY STORE, NANCHANG DONGTIAN ELECTRONIC COMMERCE CO., LTD.. NANTONG GELAS IMPORT & EXPORT CO., LTD., NEW LIFE PARTY STORE, PARTY BALLOONS STORE, PARTY CELEBRATION **GROCERY** STORE, STORE. **PARTY** PARTYGUYS STORE, PHOTURT BACKDROP DESIGN STORE, PONYOCABIN STORE, POP ELEMENTS LUGGAGE STORE, PURSUIT OF HAPPYNESS STORE, QINGDAO BUZZY LTD., CULTURAL CO., OUANZHOU GUANGHE MINGLIANG TRADING CO., LTD., QUANZHOU WANTWELL INFORMATION & TECHNOLOGY CO., LTD.,

OUANZHOU YAER ELECTRONIC COMMERCE CO., LTD., QUANZHOU YOHO YOHO TRADING CO., LTD., RC BUILDING BLOCKS STORE, RIBOW TOY WHOSALE AND RETAIL STORE STORE, RIMU TOY STORE, S181 STORE, SENSFUN OFFICIAL STORE, SHENZHEN BEIAN TOP TRADING CO., LTD., **SHENZHEN** DIHAO TECHNOLOGY CO., LTD., SHENZHEN JOYTOY STORE, SHENZHEN NEWSTAR ELECTRONIC TECHNOLOGY CO., LTD., TUOYI **ELECTRONIC SHENZHEN** SHOP1113240 COMMERCE CO., LTD., STORE, SHOP3215086 STORE, SHOP3929008 STORE, SHOP4417158 STORE, SHOP4873033 STORE, SHOP5004496 STORE, SHOP5422160 STORE, SHOP5429173 STORE, SHOP5633027 STORE, SHOP5728157 STORE, SHOP5874077 STORE, SHOP5883889 STORE, SHOP5886488 STORE, SHOP719161 STORE, SHOP726174 STORE. SHOP910438252 STORE. SHOP910559417 STORE, SHOP911137281 SHOP911405027 STORE, STORE, STORE. SHOP911419007 SHOP911412452 STORE, SHOP934283 STORE, SKYLESSHINE STORE, SMILEPARTY STORE, SPECIALLY PARTY STORE, ST005 STORE, STARRIVER STORE, SUPERY PARTY STORE, SUTAIBAI BACKDROP BACKGROUND **FACTORY** STORE, SZFOSITE BACKDROP STORE, THE DROPSHIPPING RC TOY AND GIFT STORE, THEHAPPYDAY STORE, TIANJIN SUXINYI TECHNOLOGY CO., LTD., TOLER STORE, TOY WORLD CITY STORE, TTY PARTY STORE, UBALLOONS STORE, UFAMILY STORE, UGLY MONKEY PARTY STORE, WE PARTY STORE, WJP PARTY STORE, XIAMEN DI220 ELECTRONIC COMMERCE CO., LTD., XIAMEN HEMAOXIN INDUSTRY & TRADE CO., LTD., XIONGYI, XOXOX STORE, XT03 STORE, YANGZHOU AIXINI INTERNATIONAL TRADE IMPORT AND EXPORT CO., LTD., YANGZHOU CHAOMAN CULTURAL MEDIA CO., LTD., YANGZHOU DULALA CRAFTS LTD., YANGZHOU LSD ELECTRONIC CO., LTD., YHZNXH STORE, YIWU CHUYUN TRADE CO., LTD., YIWU CITY XINYANG IMPORT AND EXPORT CO., LTD., YIWU CORA TRADE CO., LTD., YIWU DAMAI CRAFT CO., LTD., YIWU DINGXIN E-COMMERCE CO., LTD., YIWU GUESS

CRAFTS CO., LTD., YIWU KATE IMP & EXP CO., LTD., YIWU KE HUAN TRADING CO., LTD., YIWU LUANLI GARMENT CO., LTD., YIWU M&D IMPORT AND EXPORT CO., LTD., YIWU QIANG RUN GARMENT FACTORY, YIWU QIAOMAO GARMENT CO., YIWU **QIBAO** NETWORK LTD., TECHNOLOGY CO., LTD., YIWU QINGCHEN TRADE CO., LTD., YIWU SUE LUCKY GARMENTS FACTORY, YIWU WEITUO ARTS & CRAFTS CO., LTD., YIWU XINENG FIRM, YIWU E-COMMERCE XIQING IMPORT AND EXPORT CO., LTD., YIWU YINGHAN GARMENT FACTORY, YIZHENG LIUJI TOWN XINCHEN TOY FACTORY, YXX13 STORE and ZHONGSHAN SHUNXIN **PACKAGING MATERIAL** CO., LTD.,

Defendants

GLOSSARY

<u>Term</u>	Definition
Plaintiff or Moonbug	Moonbug Entertainment Limited
	Moonbug Entertainment Limited 138 Store, 4ever Keep Real Store, Anhui Prime Technology Co., Ltd., Anhui RON.VE.XIN International Trade Co., Ltd., anime zone Store, animecollection Store, Avezano Backdrop Store, Baby k Party Store, Baby Pink Store, Baby Toy World Store, Babysunhine0305 Store, background Store, Be funny party Store, BEETOY Toy Store, Belly Toy Store, Bengbu Swan Gifts Co., Ltd., Best-Mother & Baby Store, Bratsweetis Store, Brave Newworld Store, Brilliant Cheerful Life Store, Brilliant Fun Party Store, Brilliant Party Life Store, Brilliant Party Store, Children Sweet Home, ChristineBest Store, City of Stars Store, Cola Party Store, cool-kids Store, cosfans costumes Store, Cozy Party Store, CozyDog Store, Crystal Technology, Cyml party Store, David Party Store, Dayofsugar Store, Decorative balloons Store, DHSM Toy Store, Dongguan Chashan Jiye Toys & Gifts Factory, Dongguan Huaqun Technology Co., Ltd., Dongguan Nuosheng Electronic Technology, Dongguan Nuo Yi Toys Co., Ltd., Dongguan Rui Teng Gift Co., Ltd., Dongguan Shuangyuan Garments Co., Ltd., Dreams It Possible Store, dulababy Store, Enjoyparty Store, Estrella Store, F102 Store, Fairy tale world frist, FEMAILY Store, Fengcai Trading (Shenzhen) Co., Ltd., Fourtry Store, Free Market Co., Ltd., Futhure Stars Plush Store, Fuzhou Nicrolandee Arts & Craft Co., Ltd., Fuzhou Partycool Trading Co., Ltd., Fuzhou PartyPlace Trading Co., Ltd., GTT11 Store, Guangzhou Gongyucheng Trading Co., Ltd., haee toy Store, hai xin Store, Hangzhou Easternhope Arts & Crafts Co., Ltd., Hello Balloons, Henan Diriver Trading Co., Ltd., Inland Party Store, InMemory Official Store, Intriguing Store, Jiangsu Dinghong Import And Export Co., Ltd., Jiangxi Yunzhou
	Ltd., Dreams It Possible Store, dulababy Store, Enjoyparty Store, Estrella Store, F102 Store, Fairy tale world frist, FEMAILY Store, Fengcai Trading (Shenzhen) Co., Ltd., Fourtry Store, Free Market Co., Ltd., Future Stars Plush Store, Fuzhou Nicrolandee Arts & Craft Co., Ltd., Fuzhou Partycool Trading Co., Ltd., Fuzhou PartyPlace Trading Co., Ltd., GTT11 Store, Guangzhou Gongyucheng Trading Co., Ltd., haee toy Store, hai xin Store, Hangzhou Easternhope Arts &
	Trading Co., Ltd., Inland Party Store, InMemory Official Store, Intriguing Store, Jiangsu Dinghong
	& Export Co., Ltd., New Life Party Store, Party balloons Store, Party Celebration Store, Party Grocery

Store, PARTYGUYS Store, PHOTURT Backdrop Design Store, PonyoCabin Store, Pop Elements Luggage Store, Pursuit of Happyness Store, Qingdao Cultural Co., Ltd., Quanzhou Guanghe Mingliang Trading Co., Ltd., Quanzhou Wantwell Information & Technology Co., Ltd., Quanzhou Yaer Electronic Commerce Co., Ltd., Quanzhou Yoho Yoho Trading Co., Ltd., RC Building Blocks Store, RIBOW Toy Whosale and Retail Store Store, RIMU Toy Store, S181 Store, Sensfun Official Store, Shenzhen Beian Top Trading Co., Ltd., Shenzhen Dihao Technology Co., Ltd., ShenZhen JoyToy Store, Shenzhen Newstar Electronic Technology Co., Ltd., Shenzhen Tuoyi Electronic Commerce Co., Ltd., Shop1113240 Store, Store, Shop3215086 Shop3929008 Store, Shop4417158 Store, Shop4873033 Store, Shop5004496 Store, Shop5422160 Store, Shop5429173 Store, Shop5633027 Store, Shop5728157 Store. Shop5874077 Store. Shop5883889 Store, Shop5886488 Store, Shop719161 Store, Shop726174 Store, Shop910438252 Store, Shop910559417 Store, Shop911137281 Store, Shop911405027 Store, Shop911412452 Store, Shop911419007 Store, Shop934283 Store, Skylesshine Store, Smileparty Store, Specially party Store, ST005 Store, Starriver Store, Supery Party Store, SUTAIBAI backdrop background Factory Store, SZFOSITE Backdrop Store, The Dropshipping RC TOY and Gift theHappyDay Store, Tianjin Suxinvi Store, Technology Co., Ltd., TOLER Store, Toy World City Store, TTY Party Store, UBalloons Store, UFamily Store, Ugly Monkey Party Store, WE PARTY Store, WJP Party Store, Xiamen DI220 Electronic Commerce Co., Ltd., Xiamen Hemaoxin Industry & Trade Co., Ltd., xiongyi, XOXOX Store, XT03 Store, Yangzhou Aixini International Trade Import And Export Co., Ltd., Yangzhou Chaoman Cultural Media Co., Ltd., Yangzhou Dulala Crafts Ltd., Yangzhou Lsd Electronic Co., Ltd., YHZNXH Store, Yiwu Chuyun Trade Co., Ltd., Yiwu City Xinyang Import And Export Co., Ltd., Yiwu Cora Trade Co., Ltd., Yiwu Damai Craft Co., Ltd., Yiwu Dingxin E-Commerce Co., Ltd., Yiwu Guess Crafts Co., Ltd., Yiwu Kate Imp & Exp Co., Ltd., Yiwu Ke Huan Trading Co., Ltd., Yiwu Luanli Garment Co., Ltd., Yiwu M&d Import And Export Co., Ltd., Yiwu Qiang Run Garment Factory, Yiwu Qiaomao Garment Co., Ltd., Yiwu Qibao Network Technology Co., Ltd., Yiwu Qingchen Trade Co., Ltd., Yiwu Sue Lucky Garments Factory, Yiwu Weituo Arts

	& Crafts Co., Ltd., Yiwu Xineng E-Commerce Firm, Yiwu Xiqing import and Export Co., Ltd., Yiwu Yinghan Garment Factory, Yizheng Liuji Town Xinchen Toy Factory, yxx13 Store and Zhongshan
	Shunxin Packaging Material Co., Ltd.
Alibaba	Alibaba.com, an online marketplace platform that allows manufacturers, wholesalers and other third-party merchants, like Defendants, to advertise, offer for sale, sell, distribute and ship their wholesale and retail products originating from China directly to consumers across the world and specifically to consumers residing in the U.S., including New York
AliExpress	Aliexpress.com, an online marketplace platform that allows manufacturers, wholesalers and other third-party merchants, like Defendants, to advertise, offer for sale, sell, distribute and ship their wholesale and retail products originating from China directly to consumers across the world and specifically to consumers residing in the U.S., including New York
Epstein Drangel	Epstein Drangel LLP, counsel for Plaintiff
New York Address	244 Madison Ave, Suite 411, New York, New York 10016
Complaint	Plaintiff's Complaint
Application	Plaintiff's Ex Parte Application for: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts (as defined infra) and Defendants' Assets (as defined infra) with the Financial Institutions (as defined infra); 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service and 5) an order authorizing expedited discovery
Ahton Dec.	Declaration of Karine Ahton in Support of Plaintiff's Application
Drangel Dec.	Declaration of Jason M. Drangel in Support of Plaintiff's Application
Blippi	A fun, energetic entertainer known for his goofy mannerisms, signature blue and orange outfit and educational videos
Blippi Content	Interactive videos exploring the world through the eyes of a child while teaching them valuable skills such as counting, learning colors and much more
Blippi Registrations	U.S. Trademark Registration Nos.: 5,333,930 for "BLIPPI" for a variety of goods in Class 28 and 5,335,209 for "BLIPPI" for a variety of goods in Class 25
Blippi Application	U.S. Trademark Serial Application No. 79/297,577 for
Disphi Whhuganon	O.S. Frauchiank Schai Application 190, 131231,377 101

	, for goods in Classes 9, 16, 25, 28 and
	41
Blippi Marks	The marks covered by the Blippi Registrations and the
Diani Dandrata	Blippi Application A variety of consumer products, such as t-shirts,
Blippi Products	backpacks and other gear
Counterfeit Products	Products bearing or used in connection with the Blippi
	Marks, and/or products in packaging and/or containing
	labels bearing the Blippi Marks, and/or bearing or used
	in connection with marks that are confusingly similar
	to the Blippi Marks and/or products that are identical or
	confusingly similar to the Blippi Marks
Infringing Listings	Defendants' listings for Counterfeit Products
User Accounts	Any and all websites and any and all accounts with online marketplace platforms such as Alibaba and
	AliExpress, as well as any and all as yet undiscovered
	accounts with additional online marketplace platforms
	held by or associated with Defendants, their respective
	officers, employees, agents, servants and all persons in
	active concert or participation with any of them
Merchant Storefronts	Any and all User Accounts through which Defendants,
	their respective officers, employees, agents, servants
	and all persons in active concert or participation with
	any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display,
	offer for sale, sell and/or otherwise deal in Counterfeit
	Products, which are held by or associated with
	Defendants, their respective officers, employees,
	agents, servants and all persons in active concert or
	participation with any of them
Defendants' Assets	Any and all money, securities or other property or
	assets of Defendants (whether said assets are located in
Defendants' Financial	the U.S. or abroad)
Defendants' Financial Accounts	Any and all financial accounts associated with or utilized by any Defendants or any Defendants' User
ACCOUNTS	Accounts or Merchant Storefront(s) (whether said
	account is located in the U.S. or abroad)
Financial Institutions	Any banks, financial institutions, credit card companies
	and payment processing agencies, such as PayPal Inc.
Table 1	("PayPal"), Payoneer Inc. ("Payoneer"), the Alibaba
	Group d/b/a Alibaba.com payment services (e.g.,
***	Alipay.com Co., Ltd., Ant Financial Services Group),
***************************************	PingPong Global Solutions, Inc. ("PingPong") and other companies or agencies that engage in the
The state of the s	processing or transfer of money and/or real or personal
	processing or transier of money and/or rear or personar

	property of Defendants
Third Party Service Providers	Online marketplace platforms, including, without limitation, those owned and operated, directly or indirectly by Alibaba and/or AliExpress, as well as any and all as yet undiscovered online marketplace platforms and/or entities through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them manufacture, import, export, advertise, market, promote, distribute, offer for sale, sell and/or otherwise deal in Counterfeit Products which are hereinafter identified as a result of any order entered in this action, or otherwise

On this day, the Court considered Plaintiff's ex parte application for the following: 1) a temporary restraining order; 2) an order restraining Merchant Storefronts and Defendants' Assets with the Financial Institutions; 3) an order to show cause why a preliminary injunction should not issue; 4) an order authorizing bifurcated and alternative service and 5) an order authorizing expedited discovery against Defendants, Third Party Service Providers and Financial Institutions in light of Defendants' intentional and willful offerings for sale and/or sales of Counterfeit Products. A complete list of Defendants is attached hereto as **Schedule A**, which also includes links to Defendants' Merchant Storefronts and Infringing Listings. Having reviewed the Application, Declarations of Karine Ahton and Jason M. Drangel, along with exhibits attached thereto and other evidence submitted in support thereof, the Court makes the following findings of fact and conclusions of law:

FACTUAL FINDINGS & CONCLUSIONS OF LAW

- 1. Moonbug is a global entertainment company that creates and distributes inspiring and engaging stories to expand kids' worlds and minds under their own popular brands, such as Cocomelon, Little Baby Bum, Arpo and The Sharksons, as well as in partnership with prominent children's entertainment brands including Mattel Inc., Nickelodeon, Procter & Gamble and LEGO.
- 2. Moonbug recently acquired the intellectual property assets for the popular Blippi children's program featuring the main character Blippi a fun, energetic entertainer known for his goofy mannerisms, signature blue and orange outfit and educational videos. Blippi's popularity stems from interactive videos exploring the world through the eyes of a child while teaching them valuable skills such as counting, learning colors and much more.
 - 3. Established in 2014, the Blippi YouTube Channel now has 12.4 million subscribers

¹ Where a defined term is referenced herein and not defined herein, the defined term should be understood as it is defined in the Glossary.

and has surpassed 9 billion views. The Blippi Content can also be found on other streaming platforms such as Hulu, Roku and Amazon Prime Video.

- 4. In addition to streaming content, Blippi has also developed a variety of consumer products, such as t-shirts, backpacks and other gear, which is sold through the official Blippi store at https://shop.moonbug.com/collections/blippi.
 - 5. The Blippi Products typically retail for between \$1.99-39.99.
- 6. Moonbug recently acquired all right, title and interest to U.S. Trademark Registration Nos. 5,333,930 and 5,335,209 through assignments from Kideo, Inc.
- 7. Through this recent acquisition, Moonbug has gained significant common law trademark and other rights in its Blippi Marks and Blippi Products through its predecessors' use, advertising and promotion.
- 8. For example, Moonbug now owns the following U.S. Trademark Registration Nos.: 5,333,930 for "BLIPPI" for a variety of goods in Class 28 and 5,335,209 for "BLIPPI" for a variety

of goods in Class 25. Moonbug also applied for the registration of " ", which is covered by U.S. Trademark Serial Application No. 79/297,577 for goods in Classes 9, 16, 25, 28 and 41.

- 9. Defendants are manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale or Counterfeit Product through Defendants' User Accounts and Merchant Storefronts with Alibaba and AliExpress (see Schedule A for links to Defendants' Merchant Storefronts and Infringing Listings);
- 10. Alibaba and AliExpress are an online marketplaces and e-commerce platforms, which allows manufacturers and other third-party merchants, like Defendants, to advertise, distribute, offer for sale, sell and ship their retail products, which, upon information and belief,

primarily originate from China, directly to consumers worldwide and specifically to consumers residing in the U.S., including New York.

- 11. Defendants are not, nor have they ever been, authorized distributors or licensees of the Blippi Products. Neither Plaintiff, nor any of Plaintiff's authorized agents, have consented to Defendants' use of the Blippi Marks, nor has Plaintiff consented to Defendants' use of marks that are confusingly similar to, identical to and constitute a counterfeiting or infringement of the Blippi Marks;
- 12. Plaintiff is likely to prevail on its Lanham Act and related common law claims at trial;
- 13. As a result of Defendants' infringements, Plaintiff, as well as consumers, are likely to suffer immediate and irreparable losses, damages and injuries before Defendants can be heard in opposition, unless Plaintiff's Application for *ex parte* relief is granted:
 - a. Defendants have offered for sale and sold substandard Counterfeit Products that infringe the Blippi Marks;
 - b. Plaintiff has well-founded fears that more Counterfeit Products will appear in the marketplace; that consumers may be misled, confused and disappointed by the quality of these Counterfeit Products, resulting in injury to Plaintiff's reputation and goodwill; and that Plaintiff may suffer loss of sales for the Blippi Products; and
 - c. Plaintiff has well-founded fears that if they proceed on notice to Defendants on this Application, Defendants will: (i) secret, conceal, destroy, alter, sell-off, transfer or otherwise dispose of or deal with Counterfeit Products or other goods that infringe the Blippi Marks, the means of obtaining or manufacturing such Counterfeit Products, and records relating thereto that are in their possession or under their control, (ii) inform their suppliers and others of Plaintiff's claims with the result being that those suppliers and others may also secret, conceal, sell-off or otherwise dispose of

Counterfeit Products or other goods infringing the Blippi Marks, the means of obtaining or manufacturing such Counterfeit Products, and records relating thereto that are in their possession or under their control, (iii) secret, conceal, transfer or otherwise dispose of their ill-gotten proceeds from its sales of Counterfeit Products or other goods infringing the Blippi Marks and records relating thereto that are in their possession or under their control and/or (iv) open new User Accounts and Merchant Storefront under new or different names and continue to offer for sale and sell Counterfeit Products with little to no consequence;

- 14. The balance of potential harm to Defendants of being prevented from continuing to profit from their illegal and infringing activities if a temporary restraining order is issued is far outweighed by the potential harm to Plaintiff, its business, the goodwill and reputation built up in and associated with the Blippi Marks and to its reputations if a temporary restraining order is not issued;
- 15. Public interest favors issuance of the temporary restraining order in order to protect Plaintiff's interests in and to its Blippi Marks, and to protect the public from being deceived and defrauded by Defendants' passing off of their substandard Counterfeit Products as Blippi Products;
- 16. Plaintiff has not publicized their request for a temporary restraining order in any way;
- 17. Service on Defendants via electronic means is reasonably calculated to result in proper notice to Defendants.
- 18. If Defendants are given notice of the Application, they are likely to secret, conceal, transfer or otherwise dispose of their ill-gotten proceeds from their sales of Counterfeit Products or other goods infringing the Blippi Marks. Therefore, good cause exists for granting Plaintiff's request for an asset restraining order. It typically takes the Financial Institutions a minimum of five (5) days after service of the Order to locate, attach and freeze Defendants' Assets and/or

Defendants' Financial Accounts and it is anticipated that it will take the Third Party Service Providers a minimum of five (5) days to freeze Defendants' Merchant Storefronts. As such, the Court allows enough time for Plaintiff to serve the Financial Institutions and Third Party Service Providers with this Order, and for the Financial Institutions and Third Party Service Providers to comply with the Paragraphs I(B)(1) through I(B)(2) and I(C)(1) of this Order, respectively, before requiring service on Defendants.

19. Similarly, if Defendants are given notice of the Application, they are likely to destroy, move, hide or otherwise make inaccessible to Plaintiff the records and documents relating to Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or sale of Counterfeit Products. Therefore, Plaintiff has good cause to be granted expedited discovery.

ORDER

Based on the foregoing findings of fact and conclusions of law, Plaintiff's Application is hereby **GRANTED** as follows:

I. Temporary Restraining Order

- A. IT IS HEREBY ORDERED, as sufficient cause has been shown, that Defendants are hereby restrained and enjoined from engaging in any of the following acts or omissions for fourteen (14) days from the date of this order, and for such further period as may be provided by order of the Court:
 - manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale, selling and/or otherwise dealing in Counterfeit Products, or any other products bearing the Blippi Marks and/or marks that are confusingly similar to, identical to and constitute a counterfeiting or infringement of the Blippi Marks;
 - 2) directly or indirectly infringing in any manner Plaintiff's Blippi Marks;

- using any reproduction, counterfeit, copy or colorable imitation of Plaintiff's Blippi
 Marks to identify any goods or service not authorized by Plaintiff;
- 4) using Plaintiff's Blippi Marks and/or any other marks that are confusingly similar to the Blippi Marks on or in connection with Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, offering for sale, selling and/or otherwise dealing in Counterfeit Products;
- using any false designation of origin or false description, or engaging in any action which is likely to cause confusion, cause mistake and/or to deceive members of the trade and/or the public as to the affiliation, connection or association of any product manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale or sold by Defendants with Plaintiff, and/or as to the origin, sponsorship or approval of any product manufactured, imported, exported, advertised, marketed, promoted, distributed, displayed, offered for sale or sold by Defendants and Defendants' commercial activities and Plaintiff;
- secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with: (i) Counterfeit Products and/or (ii) any computer files, data, business records, documents or any other records or evidence relating to their User Accounts, Merchant Storefronts or Defendants' Assets and the manufacture, importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products;
- and/or utilizing any other platform, User Account, Merchant Storefront or any other means of importation, exportation, advertising, marketing, promotion, distribution, display, offering for sale and/or sale of Counterfeit Products for the purposes of circumventing or otherwise avoiding the prohibitions set forth in this Order; and

- 8) knowingly instructing any other person or business entity to engage in any of the activities referred to in subparagraphs I(A)(1) through I(A)(7) above and I(B)(1) through I(B)(2) and I(C)(1) below.
- B. IT IS HEREBY ORDERED, as sufficient cause has been shown, that the Third Party Service Providers and Financial Institutions are hereby restrained and enjoined from engaging in any of the following acts or omissions for fourteen (14) days from the date of this order, and for such further period as may be provided by order of this Court:
 - secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying Defendants' Assets from or to Defendants' Financial Accounts until further ordered by this Court;
 - 2) secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with any computer files, data, business records, documents or any other records or evidence relating to Defendants' Assets and Defendants' Financial Accounts; and
 - 3) knowingly instructing, aiding or abetting any person or business entity in engaging in any of the activities referred to in subparagraphs I(A)(I) through I(A)(7) and I(B)(1) through I(B)(2) above and I(C)(1) below.
- C. IT IS HEREBY ORDERED, as sufficient cause has been shown, that the Third Party Service Providers are hereby restrained and enjoined from engaging in any of the following acts or omissions for fourteen (14) days from the date of this order, and for such further period as may be provided by order of this Court:
 - within five (5) days after receipt of service of this Order, providing services to Defendants,
 Defendants' User Accounts and Defendants' Merchant Storefronts, including, without
 limitation, continued operation of Defendants' User Accounts and Merchant Storefronts;
 and

2) knowingly instructing, aiding, or abetting any other person or business entity in engaging in any of the activities referred to in subparagraphs I(A)(1) through I(A)(4), I(B)(1) through I(B)(2) and I(C)(1) above.

II. Order to Show Cause Why A Preliminary Injunction Should Not Issue And Order Of Notice

- A. Defendants are hereby ORDERED to show cause before this Court in Courtroom _______of the United States District Court for the Southern District of New York at 500 Pearl Street/40 Foley Square, New York, New York on Many May May 2021 at 2.00 μ.m. or at such other time that this Court deems appropriate, why a preliminary injunction, pursuant to Fed. R. Civ. P. 65(a), should not issue. may 1.54 a the project and interpret of the public to Fed. R. Civ. P. 65(a), should not issue. may 1.54 a the project and the filed electronically with the filed electronically with their phones.

 B. IT IS FURTHER ORDERED that opposing papers, if any, shall be filed electronically with their phones where the Court and served on Plaintiff's counsel by delivering copies thereof to the office of Epstein Drangel LLP at 60 East 42nd Street, Suite 2520, New York, NY 10165, Attn: Jason M. Drangel on or before Monday May 17, 2021. Plaintiff shall file any Reply papers on or before the project and pr
- C. IT IS FURTHER ORDERED that Defendants are hereby given notice that failure to appear at the show cause hearing scheduled in **Paragraph II(A)** above may result in the imposition of a preliminary injunction against them pursuant to Fed. R. Civ. P. 65, which may take effect immediately upon the expiration of this Order, and may extend throughout the length of the litigation under the same terms and conditions set forth in this Order.

Tresday, May 18, 2021 at 2021.

III. Asset Restraining Order

A. IT IS FURTHER ORDERED pursuant to Fed. R. Civ. P. 64 and 65 and N.Y. C.P.L.R. 6201 and this Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order, the Financial Institutions shall locate and attach Defendants'

Financial Accounts and shall provide written confirmation of such attachment to Plaintiff's counsel.

IV. Order Authorizing Bifurcated and Alternative Service by Electronic Means

- A. IT IS FURTHER ORDERED pursuant to Fed. R. Civ. P. 4(f)(3), as sufficient cause has been shown, that service may be made on, and shall be deemed effective as to Defendants if it is completed by the following means:
 - delivery of: (i) PDF copies of this Order together with the Summons and Complaint, or

 (ii) a link to a secure website (including NutStore, a large mail link created through
 Rmail.com and via website publication through a specific page dedicated to this
 Lawsuit accessible through ipcounselorslawsuit.com) where each Defendant will be
 able to download PDF copies of this Order together with the Summons and Complaint,
 and all papers filed in support of Plaintiff's Application seeking this Order to
 Defendants' e-mail addresses to be determined after having been identified by Alibaba
 and/or AliExpress pursuant to Paragraph V(C); or
 - delivery of a message to Defendants through the same means that Plaintiff's agents have previously communicated with Defendants, namely the system for communications established by the Third Party Service Providers on their respective platforms, notifying Defendants that an action has been filed against them in this Court and providing a link to a secure website (such as NutStore or a large mail link created through Rmail.com) where each Defendant will be able to download PDF copies of this Order together with the Summons and Complaint, and all papers filed in support of Plaintiff's Application seeking this Order.
- B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that such alternative service by electronic means ordered herein shall be deemed effective as to Defendants, Third Party Service Providers and Financial Institutions through the pendency of this action.

- C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that such alternative service by electronic means ordered herein shall be made within five (5) days of the Financial Institutions and Third Party Service Providers' compliance with **Paragraphs III(A)** and **V(C)** of this Order.
- D. IT IS FURTHER ORDERED, as sufficient cause has been shown, that the Clerk of the Court shall issue a single original summons directed to all Defendants as listed in an attachment to the summons that will apply to all Defendants.
- E. IT IS FURTHER ORDERED, as sufficient cause has been shown, that service may be made and shall be deemed effective as to the following if it is completed by the below means:
 - 1) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where PayPal Inc. will be able to download a PDF copy of this Order via electronic mail to PayPal Legal Specialist at EEOMALegalSpecialist@paypal.com;
 - 2) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where AliPay.com Co., Ltd., Ant Financial Services will be able to download a PDF copy of this Order via electronic mail Mr. Di Zhang, Member of the Legal & Compliance Department IP, at di.zd@alipay.com;
 - 3) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where Alibaba will be able to download a PDF copy of this Order via electronic mail to Ms. Rachel Wang, Legal Counsel, Alibaba Group at rachel.wy@alibaba-inc.com and Ms. Yujuan He, Paralegal, Alibaba Group at chloe.he@alibaba-inc.com;
 - 4) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where Payoneer Inc. will be able to download a PDF copy of this Order via electronic mail to Payoneer Inc.'s Customer Service Management at customerservicemanager@payoneer.com and Edward Tulin, counsel for Payoneer Inc., at Edward.Tulin@skadden.com; and
 - 5) delivery of: (i) a PDF copy of this Order, or (ii) a link to a secure website where PingPong

Global Solutions Inc. will be able to download a PDF copy of this Order via electronic mail to legal@pingpongx.com.

V. Order Authorizing Expedited Discovery

- A. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:
 - 1) Within fourteen (14) days after receiving service of this Order, each Defendant shall serve upon Plaintiff's counsel a written report under oath providing:
 - a. their true name and physical address;
 - b. the name and location and URL of any and all websites that Defendants own and/or operate and the name, location, account numbers and URL for any and all User Accounts and Merchant Storefronts on any Third Party Service Provider platform that Defendants own and/or operate;
 - c. the complete sales records for any and all sales of Counterfeit Products, including but not limited to number of units sold, the price per unit, total gross revenues received (in U.S. dollars) and the dates thereof;
 - d. the account details for any and all of Defendants' Financial Accounts, including, but not limited to, the account numbers and current account balances; and
 - e. the steps taken by each Defendant, or other person served to comply with SectionI, above.
 - 2) Plaintiff may serve interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure as well as Local Civil Rule 33.3 of the Local Rules for the Southern and Eastern Districts of New York and Defendants who are served with this Order shall provide written responses under oath to such interrogatories within fourteen (14) days of service to Plaintiff's counsel.
 - 3) Plaintiff may serve requests for the production of documents pursuant to Fed. R. Civ. P. 26 and 34, and Defendants who are served with this Order and the requests for the production

- of documents shall produce all documents responsive to such requests within fourteen (14) days of service to Plaintiff's counsel.
- B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order the Financial Institutions shall identify any and all of Defendants' Financial Accounts, and provide Plaintiff's counsel with a summary report containing account details for any and all such accounts, which shall include, at a minimum, identifying information for Defendants, including contact information for Defendants (including, but not limited to, mailing addresses and e-mail addresses), account numbers and account balances for any and all of Defendants' Financial Accounts and confirmation of said compliance with this Order.
- C. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within five (5) days of receipt of service of this Order, the Third Party Service Providers shall identify any and all of Defendants' User Accounts and Merchant Storefronts, and provide Plaintiff's counsel with a summary report containing account details for any and all User Accounts and Merchant Storefronts, which shall include, at a minimum, identifying information for Defendants and Defendants' User Accounts and Defendants' Merchant Storefronts, contact information for Defendants (including, but not limited to, mailing addresses and e-mail addresses) and confirmation of said compliance with this Order.

D. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- 1) Within fourteen (14) days of receiving actual notice of this Order, all Financial Institutions who are served with this Order shall provide Plaintiff's counsel all documents and records in their possession, custody or control (whether located in the U.S. or abroad) relating to any and all of Defendants' Financial Accounts, including, but not limited to, documents and records relating to:
 - a. account numbers;

- b. current account balances;
- any and all identifying information for Defendants, Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, names, addresses and contact information;
- d. any and all account opening documents and records, including, but not limited to, account applications, signature cards, identification documents and if a business entity, any and all business documents provided for the opening of each and every of Defendants' Financial Accounts;
- e. any and all deposits and withdrawals during the previous year from each and every one of Defendants' Financial Accounts and any and all supporting documentation, including, but not limited to, deposit slips, withdrawal slips, cancelled checks and account statements; and
- f. any and all wire transfers into each and every one of Defendants' Financial Accounts during the previous year, including, but not limited to, documents sufficient to show the identity of the destination of the transferred funds, the identity of the beneficiary's bank and the beneficiary's account number.

E. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

- 1) Within fourteen (14) days of receipt of service of this Order, the Third Party Service

 Providers shall provide to Plaintiff's counsel all documents and records in its

 possession, custody or control (whether located in the U.S. or abroad) relating to

 Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not

 limited to, documents and records relating to:
 - a. any and all User Accounts and Defendants' Merchant Storefronts and account details, including, without limitation, identifying information and account numbers for any and all User Accounts and Defendants' Merchant Storefronts that

- Defendants have ever had and/or currently maintain with the Third Party Service Providers that were not previously provided pursuant to Paragraph V(C);
- b. the identities, location and contact information, including any and all e-mail addresses of Defendants that were not previously provided pursuant to Paragraph V(C);
- c. the nature of Defendants' businesses and operations, methods of payment, methods for accepting payment and any and all financial information, including, but not limited to, information associated with Defendants' User Accounts and Defendants' Merchant Storefronts, a full accounting of Defendants' sales history and listing history under such accounts and Defendants' Financial Accounts with any and all Financial Institutions associated with Defendants' User Accounts and Defendants' Merchant Storefronts; and
- d. Defendants' manufacturing, importing, exporting, advertising, marketing, promoting, distributing, displaying, offering for sale and/or selling of Counterfeit Products, or any other products bearing the Blippi Marks and/or marks that are confusingly similar to, identical to and constitute an infringement of the Blippi Marks.

VI. Security Bond

A. IT IS FURTHER ORDERED that Plaintiff shall place security in the amount of The thouse and Dollars (\$5000.00) with the Court which amount is determined adequate for the payment of any damages any person may be entitled to recover as a result of an improper or wrongful restraint ordered hereunder.

VII. Sealing Order

A. IT IS FURTHER ORDERED that Plaintiff's Complaint and exhibits attached thereto, and Plaintiff's ex parte Application and the Declarations of Karine Ahton and Jason M. Drangel in support thereof and exhibits attached thereto, and this Order shall remain sealed until the Financial Institutions and Third Party Service Providers comply with Paragraphs I(B)-(C), III(A) and V(C) of this Order.

SO ORDERED.

SIGNED this 13 day of May , 2021, at 2135 p.m.

Ului C
UNITED STATES DISTRICT JUDGE

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SCHEDULE A

No. Defendant	infringing Listing	Werchant Storefront
1 138 Store	aliexpress.com/item/	https://www.aliexpress.com/store/700401
3 Jahni Prima Tachnolosy Co. 114	Intips//www.allexpress.com/item/10030020b3/26483 https://www.allhaba.com/oroning-dotal//hildeon.c.Endich.Enlightsoment-Bongsom Blioni 1600340035175	https://www.allexpress.com/store/9111980/3
4 Anhui RON VE XIN International Trade Co. 11d	https://www.alibaba.com/product-detail/Chindens-English-Enlightermren-ringlam-shippi_toUntqu620173 https://www.alibaba.com/product-detail/Mholecale.American-Children-s-English-Enlishsomer 52470061182	https://enprint.enabada.com/ https://mit21728312was.enablibaba.com/
Sanime zone Store	https://www.alianuresc.com/item/1005001346136217	https://discretizediscom/store/3010114
6 animecollection Store		/www.aliexpress.com/store
7 Avezano Backdrop Store		https://www.alexpress.com/store/900251484
8 Baby k Party Store	https://www.aliexpress.com/item/4001291679269	https://www.aliexpress.com/store/5783734
9 Baby Pink Store		https://www.allexpress.com/store/4886064
10 Baby Toy World Store	https://www.allexpress.com/item/1005001601282068	https://www.aliexpress.com/store/3619179
11 Babysunhine0305 Store	https://www.aliexpress.com/item/1005001437630318	https://www.aliexpress.com/store/4268007
12 background Store		https://www.aliexpress.com/store/3007071
13 Se tunny party Store	https://www.allexpress.com/item/1005002024786438	https://www.aliexpress.com/store/910754028
14 BEELOY Toy Store	https://www.aiexpress.com/tem/1005002026818656 https://www.aiexpoore.com/tem/1005001755001530	
16 Republi Swan Gifte Co. 11d	https://www.allexpress.com/nem/10000105001050	https://www.allexpress.com/store/390/029
17 Best-Mother & Baby Store	https://www.alibxnresc.com/item/1005002121250904	https://www.alievorace.com/etora/911552213
18 Bratsweetis Store		https://www.allexpress.com/store/2835090
19 Brave Newworld Store		https://www.aliexpress.com/store/3176004
20 Brilliant Cheerful Life Store	https://www.aliexpress.com/item/1005001412499324	https://www.allexpress.com/store/5372342
21 Brilliant Fun Party Store		https://www.allexpress.com/store/5068362
22 Brilliant Party Life Store		https://www.aliexpress.com/store/5019098
23 Brilliant Party Store	https://www.aliexpress.com/item/1005001518429593	https://www.allexpress.com/store/4405171
24 Children Sweet Home	aliexpress.com/item/	https://www.aliexpress.com/store/1823629
	https://www.alexpress.com/item/1005001454142787	https://www.aliexpress.com/store/3530002
201/21 V O 31875 31072		https://www.allexpress.com/store/290/033
29 cool title store	Integral, ywww.uniergress.com/view.gram/dasact.dom/com/view.gram/dasact.dom/com/view.gram/dasact.dom/com/view.gram/dasact.dom/com/view.gram/dasact.dom/view.	https://www.aliexpress.com/store/900240462
29 Coefans costumos Stores	https://www.aliexpress.com/.item/.dongs3325.705	https://www.allexpress.com/store//allabauab
30 Cozy Party Store	integral present approximation and an advantage of the following the following inserting the following inserting and indicating the following allowing as a conditional of indicating the following allowing as a conditional of the following and the following the following and the fol	https://www.aliavpress.com/store//20505
31 CozyDog Store	https://www.aliexpress.com/item/4000075671299	https://cozydog.aliexpress.com/store/4428206
32/Crystal Technology		https://www.aliexpress.com/store/1821273
33 Cyml party Store		
34 David Party Store	https://www.aliexpress.com/item/4001202345002	https://www.aliexpress.com/store/4638054
	https://www.aiiexpress.com/item/1005001614274180	https://www.aliexpress.com/store/507668
36 Decorative balloons Store	https://www.aliexpress.com/item/1005001275078027	https://www.aliexpress.com/store/5784779
37 DHSM Toy Store	https://www.aliexpress.com/item/1005001550132851	
		https://jiyetoys.en.alibaba.com/
40 Dong an Number Electrology Co., Ltd.		https://dghuaqun.en.ailbaba.com/
44 Longguan Nuosneng Electronic Technology	https://www.alibaba.com/product-detail/New-BLPPI-Ineme-Birthday-Party-Decoration_160098134889 https://www.alibaba.com/product-detail/New-BLPPI-Ineme-Birthday-Party-Decoration_160098134889	https://partylinks.en.alibaba.com/
42) Dangguan Not Toys Co., Co.	https://www.anadac.com/credital/2017-3017-3017-3017-3017-3017-3017-3017-3	https://ndoynoysen.anpaba.com/
43 Doneguan Shuaneyuan Garments Co. 1td	https://www.aibaba.com/orndurt-detail/2021-new-theme-from-kirk-birthdays 1600190213374422	
44 Dreams It Possible Store	https://www.allexpress.com/item/1005002150703500	https://www.allexpress.com/store/4550060
45 dulababy Store	https://www.aliexpress.com/item/1005001411884020	https://www.allexpress.com/store/2883043
46 Enjoyparty Store	https://www.aliexpress.com/item/1005001529160357	https://www.aliexpress.com/store/3518100
47 Estrella Store	https://www.allexpress.com/item/1005001350585179	https://www.aliexpress.com/store/1239385
48 F102 Stare		https://www.allexpress.com/store/910342138
49 Fairy tale world frist	https://www.aiexpress.com/tem/1005001514139735	https://www.aliexpress.com/store/2073079
50 Februari Store 51 Februari Tradine (Shenzhen) Co. 14d	https://www.aiiskpiess.com/plesiy/40012/7465002 https://www.aiibaba.com/nnodurt-datail/100mrc.Hot-Salac.13inch-3c.Blinni 1600218966200	https://www.allexpress.com/store/boudsod
52 Fourtry Store	https://www.aliexpress.com/item/1005001638140046	https://www.aliexoress.com/store/910533007
	.alibaba.com/product-de	https://freemarket.en.alibaba.com/
54 Future Stars Plush Store	https://www.alexpress.com/item/4001215519833	https://www.aliexpress.com/store/4433155
	https://www.alibaba.com/product-detail/Nicro-Blippi-Theme-Party-Supplies-Set_1600226384570	https://up-top.en.alibaba.com/
56 Fuzhou Partycool Trading Co., Ltd.	https://www.alibaba.com/product-detail/PARTYCOOL-Blippi-Theme-Boy-Birthday-Party_1600185399791	https://partycool.en.alibaba.com/
5/ Fuzhou PartyPlace Trading Co., Ltd.	https://www.alibaba.com/product-detail/Blippi-Birthday-Party-Decoration-Disposable-Paper_1600233142229	https://cnpartyplace.en.alibaba.com/
59 Guanezhou Gonevuchene Tradine Co Ltd.	https://www.alihaha.com/oroduct-detail/2007.New-Arival-Boxs-Girfs-Bi iPPi 1600/62040807	https://goneyuchene.en.alihaba.com/
60 haee toy Store	https://www.aliexpress.com/item/4000625132584	https://www.aliexpress.com/store/3625024
61 hai xin Store	https://www.aliexpress.com/item/4000609029024	https://www.aliexpress.com/store/5096012
62 Hangzhou Easternhope Arts & Crafts Co., Ltd.	https://www.alibaba.com/product-detail/Blippi-Party-Supplies-Including-Birthday-Banner_1700001788056	https://eastemhope.en.alibaba.com/
63 Helio Balloons	https://www.aliexpress.com/item/1005001782250726	https://www.ailexpress.com/store/1937452

Strength Dillyst Hadring CD., LND.		https://diruífu.en.alibaba.com/
bs Inland Party Store		https://www.aliexpress.com/store/5088053
objiriwemory Unicial Store	https://www.alexpress.com/item/400101525486/ https://www.alexpress.com/item/1005001894952224	https://www.alexpress.com/store/5486177
69 Handel Distribute transcript and Consert Co. 1 and		intps://www.anexpress.com/store/910628039
es Jiangsu Dingnong Import And Export Co., Ltd.	nttos://www.aibaba.com/product-offal/Bipi-Baldoch-bet-Bippi-Theme-Party_160013738848	https://dh88.en.alibaba.com/
20 linkin Damo Todio Ci 14d	nttps://www.aibada.com/productertail/2012-tvteV-5/part-Sieeve-Lartoon-Children 1b0U24512557	https://jxyunzhou.en.alibaba.com/
74 II Dear Changia State	https://www.ainoaba.com/product-detail/2012-1-701-Selling-American-Unidren-s_1600225090195	https://jndarren.en.alibaba.com/
72 lovilinas Store	HINDS: TWO WAY ARREST TO THE FIT HAD ALL STORES AND	nttps://www.alexpress.com/store/4622037
23 Litthateas Store		https://www.allexpress.com/store/store/s
73 Julyanest ee Storie	Intigist; Viewwa allegates, complication 18.2 894	https://www.ailexpress.com/store/605272
74 Kokobar nasta Store	https://www.aikaydes.com/from/10000140049	https://www.allexpress.com/store/910352016
75 Jamianwanzi Store	https://www.ainxorgec.com/item/df001001224919	https://www.anexpress.com/store/55/2195
77 let's party Store		https://www.ahexpress.com/store/460/009
78 Lianyungang Hongwen Toys Co., Ltd.	https://www.alibaba.com/product-detail/Heh-Chaliv-Chstom-Rinni-Human 1600057081396	https://www.ailexpress.com/stole/31/3004
79 Love Party Store		https://www.alievoress.com/store/2406094
80 Lovemylife Store		https://www.alexpress.com/store/3620046
81 Magic Children World Store	https://www.allexpress.com/item/1005001927331303	https://www.allexpress.com/store/4033054
82 Molutian Official Store	https://www.aliexpress.com/item/4000295925336	https://molutian.aliexpress.com/store/4623042
83 My balloons Store		
84 My Day Toy Store		https://www.allexpress.com/store/4455001
85 Nanchang Dongtian Electronic Commerce Co., Ltd.	/www/	https://ncdontian.en.alibaba.com/
		https://nt-glass.en.alibaba.com/
87 New Life Party Store	https://www.allexpress.com/iten/1005001597373808	https://www.aliexpress.com/store/2349305
88 Party balloons store		https://yhznxh.aliexpress.com/store/5482058
90 Party Grocery Store	allexpress.com/item/100030002027	https://partycelebrationballoons.allexpress.com/store/319/05/
91 PARTYSINS Store	Intigracy forward all control for the control	https://www.allexpress.com/store/2501305
92 PHOTURI Backdrop Design Store	Integral way allegate assumptions of the control of	https://www.allexpress.com/store/4594011.
93 PonyoCabin Store		https://www.allexpress.com/store/310453555
94 Pop Elements Luggage Store		https://www.alexpress.com/store/5123060
95 Pursuit of Happyness Store		https://www.aliexpress.com/store/928644
96 Qingdao Buzzy Cultural Co., Ltd.		https://beelatex.en.alibaba.com/
97 Quanzhou Guanghe Mingliang Trading Co., Ltd.	https://www.aiibaba.com/product-detail/Wholesale-Blippi-Plush-Animal-Toy-Gifts_1600165611117	https://guanghemingliang.en.alibaba.com/
98 Quanzhou Wantwell Information & Technology Co., Ltd.	https://www.alibaba.com/product-detail/New-Design-Blippi-Party-Supplies-Birthday_1600161941764	https://wantwell.en.alibaba.com/
39 Quanzhou Yaer Electronic Lommerce Co., Lto.		https://yuanyaer.en.alibaba.com/
101 of building blocks (then		https://youhuyouhu.en.alibaba.com/
101 DISOM Tay Mikerala and Detail Come Chara		https://www.allexpress.com/store/2924016
102 block toy witosale and heldit store store		https://www.allexpress.com/store/4051035
104 K181 Store		https://www.allexpress.com/store/5004170
105 Sensfun Official Store	https://www.alkapuless.com/rem/And115405010	https://www.allexpress.com/store/91uszuzsb https://specfingrinted-allexpress.com/store/3363036
106 Shenzhen Beian Top Trading Co., Ltd.	https://www.alibaha.com/product-defail/Nice-Blinni-Theme-Party-Decoration-Set 1600232727676	https://beignton.en.alibaba.com/
107 Shenzhen Dihao Technology Co., Ltd.	https://www.albaba.com/ordust-detai/OHAO-Hot-selling-American-Children-s-16/0153781590	https://sodibao.eg.alibaba.com/
108 ShenZhen JoyToy Store		https://www.alexness.com/store/5492011
109 Shenzhen Newstar Electronic Technology Co., Ltd.		https://sznewstar.en.alibaba.com/
110 Shenzhen Tuoyi Electronic Commerce Co., Ltd.		https://tytopone.en.alibaba.com/
111 Shop1113240 Store	https://www.aliexpress.com/item/4000778493443	https://www.aliexpress.com/store/1113240
112 Shop3215086 Store	https://www.alexpress.com/item/1005001798596666	https://www.aliexpress.com/store/3215086
113 Shop3929008 Store		https://www.aliexpress.com/store/3929008
114 Shop4417158 Store		https://www.allexpress.com/store/4417158
115 Shop4873033 Store		https://www.aliexpress.com/store/4873033
116 Shop5004496 Store	https://www.alexpress.com/item/4000809261091	https://www.aliexpress.com/store/5004496
11/ Shop5422160 Stare		https://www.aliexpress.com/store/5422160
118 Shop54291/3 Store	https://www.aiexpress.com/ttem/1005002092132778	https://www.aliexpress.com/store/5429173
120 Shoos 728157 Store	https://www.alicupress.com/fifthings/25000000	Hittps://www.airexpiress.com/store/2005027
121 Shoo5874077 Store	https://www.aisxress.com/isen/dn/1767797374	https://www.alrexpress.com/stora/5224077
122 Shop5883889 Store		https://www.alexpress.com/store/5883889
123 Shap5886488 Store	.aliexpress.com/item/1005	https://www.aliexpress.com/store/5886488
124 Shap719161 Store	https://www.liexpress.com/item/40,00238602671	https://www.aliexpress.com/store/719161
125 Shop726174 Store	https://www.allexpress.com/item/1005001747117231	https://www.aliexpress.com/store/726174
126 Shop910438252 Store	https://www.alievnress.com/item/10/1500174202539	
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