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

LEGEND PICTURES, LLC,

Plaintiff,

Civil Action No.: 1:21-cv-02378

Judge Rebecca R. Pallmeyer

v.

THE PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A",

Magistrate Judge Sheila M. Finnegan

Defendants.

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff, LEGEND PICTURES, LLC ("LEGEND PICTURES" or "Plaintiff"), Motion for a Preliminary Injunction, and this Court having heard 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 (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. "In the context of cases like this one, that means a plaintiff must show that each defendant is actually operating an interactive website that is accessible in Illinois and that each defendant has aimed such site at Illinois by standing ready, willing and able to ship its counterfeit goods to customers in Illinois in particular (or otherwise has some sufficient voluntary contacts with the state)." *Am. Bridal & Prom Indus. Ass'n v. P'ships & Unincorporated Ass'ns Identified on Schedule A*, 192 F.Supp.3d 924, 934 (N.D. Ill. 2016). In this case, Plaintiff has presented screenshot evidence that each Defendant Internet Store is reaching out to do business with Illinois

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residents can and do purchase products using counterfeit versions of Plaintiff's trademarks and copyrights. *See* Docket No. 12 which includes screenshot evidence confirming that each Defendant Internet Store does stand ready, willing and able to ship its counterfeit goods to customers in Illinois bearing infringing and/or counterfeit versions of the PACIFIC RIM trademarks, U.S. Trademark Registration Nos. 5,840,140; 5,840,142; 6,195,470; 6,205,935 (collectively, the "PACIFIC RIM Trademarks") and/or products infringing the PACIFIC RIM Works, Copyright Registration Nos. PA0001859894 and PA0002091781 (the "PACIFIC RIM Works").

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 LEGEND PICTURES's previously granted Motion for a Temporary Restraining Order establishes that LEGEND PICTURES has a likelihood of success on the merits; that no remedy at law exists; and that LEGEND PICTURES will suffer irreparable harm if the injunction is not granted.

Specifically, LEGEND PICTURES has proved a *prima facie* case of trademark infringement because (1) the PACIFIC RIM Trademarks are distinctive marks and are registered with the U.S. Patent and Trademark Office on the Principal Register and the PACIFIC RIM Works are registered with the United States Copyright Office, (2) Defendants are not licensed or authorized to use the PACIFIC RIM Trademarks and PACIFIC RIM Works, and (3) Defendants' use of the PACIFIC RIM Trademarks and PACIFIC RIM Works is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with LEGEND PICTURES. Furthermore, Defendants continued and unauthorized use of the PACIFIC RIM Trademarks and PACIFIC RIM Trademarks and PACIFIC RIM Works is cousing a likelihood of the PACIFIC RIM Works is continued and unauthorized use of the PACIFIC RIM Trademarks and PACIFIC RIM Trademarks

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brand confidence, damage to LEGEND PICTURES's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, LEGEND PICTURES 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, employees, attorneys, and all persons acting for, with, by, through, under or in active concert with them be temporarily enjoined and restrained from:
 - a. using the PACIFIC RIM Trademarks and PACIFIC RIM Works or any 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 PACIFIC RIM product or not authorized by LEGEND PICTURES to be sold in connection with the PACIFIC RIM Trademarks and PACIFIC RIM Works;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine PACIFIC RIM product or any other product produced by LEGEND PICTURES, that is not LEGEND PICTURES's or not produced under the authorization, control or supervision of LEGEND PICTURES and approved by LEGEND PICTURES for sale under the PACIFIC RIM Trademarks and PACIFIC RIM Works;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of

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LEGEND PICTURES, or are sponsored by, approved by, or otherwise connected with PACIFIC RIM;

- d. further infringing the PACIFIC RIM Trademarks and PACIFIC RIM Works and damaging LEGEND PICTURES's goodwill;
- e. otherwise competing unfairly with LEGEND PICTURES 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 LEGEND PICTURES, nor authorized by LEGEND PICTURES to be sold or offered for sale, and which bear any of the PACIFIC RIM Trademarks and PACIFIC RIM Works or any reproductions, counterfeit copies or colorable imitations thereof;
- g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendant Online Stores, or any other online marketplace account that is being used to sell or is the means by which Defendants could continue to sell Counterfeit/Infringing PACIFIC RIM products; and
- h. operating and/or hosting at the Defendant Online Stores and any other online marketplace accounts registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing the PACIFIC RIM Trademarks and PACIFIC RIM Works or any reproductions, counterfeit copies or colorable imitations thereof that is not a genuine PACIFIC RIM product or not authorized by LEGEND PICTURES to be sold in connection with the PACIFIC RIM Trademarks and PACIFIC RIM Works.

- 2. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as, but not limited to, WISH and Alibaba Group Holding Ltd. along with any related Alibaba entities (collectively, "Marketplaces"), social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, 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 PACIFIC RIM Trademarks and PACIFIC RIM Works, 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 PACIFIC RIM Trademarks and PACIFIC RIM Works; and
 - c. take all steps necessary to prevent links to the Defendant Online Stores identified in Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Online Stores from any search index.
- 3. 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' Online Stores, including, without limitation, any online marketplace platforms such as Marketplaces, 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 WISH, Alibaba, Western Union, third party processors and other payment processing service providers, shippers, and online marketplace registrars

(collectively, the "Third Party Providers") shall, within three (3) business days after receipt of such notice, provide to LEGEND PICTURES 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 Defendant Online Stores, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Defendant Online Stores;
- c. Defendants' websites and/or any Online Marketplace Accounts;
- d. the Defendant Online Stores 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, WISH, Western Union, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

- 4. 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.
- ContextLogic, Inc. ("WISH") shall, within three (3) business days of receipt of this Order, for any Defendant or any of Defendant Online Stores:
 - a. locate all accounts and funds connected to Defendants, Defendant Online Stores, including, but not limited to, any WISH accounts connected to the information listed in Schedule A hereto or the email addresses identified in Exhibit 3 to the Declaration of Kristina Holliman; and
 - b. restrain and enjoin any such accounts or funds that are non-U.S. foreign based from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 6. Any banks, savings and loan associations, payment processors, or other financial institutions, for any Defendant or any Defendant Online Stores, shall within three (3) business days of receipt of this Order:

a. locate all accounts and funds connected to Defendants, or Defendants' Online Stores, including, but not limited to, any accounts connected to the information listed in Schedule A hereto or the email addresses identified in Exhibit 3 to the Declaration of Kristina Holliman; 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.
- 7. LEGEND PICTURES 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.

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4(f)(3), by electronically publishing a link to the Complaint, this Order and other relevant documents on a website, or by sending an e-mail to the e-mail addresses identified in Exhibit 3 to the Declaration of Kristina Holliman 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 "2508280188 and all other Defendants identified in the Complaint" that shall apply to all Defendants. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendants receive from Online Marketplace Accounts 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.

- Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on five days' notice to LEGEND PICTURES or on shorter notice as set by this Court.
- 9. The \$10,000 bond posted by LEGEND PICTURES shall remain with the Court until a Final disposition of this case or until this Preliminary Injunction is terminated.
- 10. The Clerk is directed to unseal any previously sealed documents in this matter, namely (1)
 Plaintiff's Schedule A attached to the Complaint, which includes a list of the Defendant
 Online Stores; (2) screenshot printouts showing the active Defendant Online Stores (Exhibit
 3 to the Declaration of Kristina Holliman) and (3) the Temporary Restraining Order.

ENTER:

Pachneye-

Rebecca R. Pallmeyer U.S. District Court Judge

Dated: May 17, 2021

No.	Defendants
1	2508280188
2	2017 online store
3	2019tukago
4	4by45
5	541v5fvfri
6	A Miss Wu
7	A sunny little shop
8	A white mountain tea
9	A858AW
10	AA123123
11	AAQQQ
12	abbc6556565fds65
13	adilanaimaidi Store
14	ai18141
15	AIYKAZYSDL
16	akjgsuardsuafp
17	alian9258
18	Allison Toys
19	AMANESER LLANERO
20	Amara Jt
21	amu816
22	amwaoyingwan
23	AMY111
24	anl1gwayash
25	Angtemu
26	anvuefty
27	appleapple456@163.com
28	arjydytkjfuyer
29	artoncanvas
30	as8588
31	aswvsds123
32	Audra Stephens
33	b78ij988
34	ba
35	baijingtian
36	baokuangde changp
37	baoxin fashion
38	baoyixing1
39	bear Co. Ltd.

SCHEDULE A

41Bestpop store42Bevenyloer Gifts43BiFangShi44Big Collectors45big factory202046binqingfutang47BOL55 PATHIHOS48Boom Fistird Moment49CAAOGUOLI50cai fashion51caipingwei Store52Canader pentakow Feirly53cangyigan954cangyrng55candiodenyin56caohuixiang fashion57caolong58caowenyao59Captain piggy house60Careulan Fans61Careyou62CartoonFiguresParadise63ccfS2164edslutmou65cengju74766chayouxian Store67CHEN YANG WEN68Chengdongmei99969chengdongmei99969chengdongmei99969chengdongmei99973chengzhutao12374chengzhutao12374chengling066777chenying88618	40	Best price auctions
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79 Christina Gibeau		
80 chunjiangshunliuy		

81	cjdhfnv
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84	CongbachuihP
85	conghuixiaopu
86	Constancedw
87	cool shenjie
88	crngbe97
89	crngnangr
90	crojkigo
91	cuizixiao0919
92	cvunhk online store
93	cwfql
94	dabaitangnaitu
95	DaonashawenlYb
96	dascez
97	DBsdkaow
98	Dear, Qian
99	dehuanwa Friday
100	DengGuanHua199857
101	dengjie fashion
102	dengjie112
103	dengyong fashion
104	Devin Martinez
105	dfsdiisplefrou
106	diamond shops
107	didiyoulimu
108	dijaidayidgasxz
109	dijianouling
110	dindDNndc
111	DIYhome
112	djhfuhjnroi
113	djjkvufgh
114	dkxnbffjckmdns
115	dl521
116	DL-Yeah
117	doiyanx6666
118	Dominick Arroyo
119	dongqintudi
120	dpsormfg
121	dsdjksal

122	dsgbsrtjnatrjg
122	duan dian
123	duguizhi
124	Dummer da
125	dunye64
120	duwnwhey
127	echosky
128	edsfds
129	ElecampaneK
130	Elizabeth Morla
131	ewoif
132	Exist for love
133	f5398SXC
134	
135	Fairys skirts fanaihua
137	fanfen meng
138	fanggongzi66
139	FANTASY666
140	Fanxinyi
141	fanyangqiang186
142	Fanyuting5580
143	Fashion Men and Women
144	Fashion Space
145	Fashion Woman counter
146	Fashionyou1999
147	Fcolubyty
148	fde4fd5
149	feeeter
150	fei shopping
151	feifeijgf
152	fejifjdife
153	fengcaizhen567
154	fengchen13138
155	fengjixuchui816
156	fengyubo95620
157	fengzaiqishi816
158	feyf8u
159	FFF66F5
160	ffgf
161	fgerbfhe
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163	fgjhhg
164	fgrt5yuuu5y
165	fguwertyh2
165	fighting boy
160	fjlfjljialili
168	flyskyshoppingmall
160	foolos
170	foreverstream
170	fuchanngguai
171	fufanghua9
172	funnyshirts
173	Funy Toys
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175	fuyayayaya
170	g6ggh889
178	g8g5g6r6
179	GadgetsParadise
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201	guihuibaidong
202	guobiying66058
203	guofang6002

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204	guokang166836
205	guomingzhang Friday
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207	guoqing fashion
208	guormr
209	guoshoupin
210	guotian fashion
211	guoweijie Store
212	guoxiaohui266
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221	hanjiangtao9790
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225	haoweier
226	haowuyidejiangjia
227	Happy Joyful Toy
228	happy zqy
229	happy6661
230	HappyDAYShopping
231	HAPPYTT6688
232	happyydz666
233	hcaiyun
234	HD printed painting
235	hdwgyg
236	Heart Sarah
237	hechen878507712
238	hedinli
239	heguanglei09857
240	hejiaxin5238
241	hellobaby002
242	henglid
243	her3i2
244	hezheng1203

245	hfieriowo
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240	HHH8886
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249	High quality wall art
250	hjgikljl1
251	HJJ
252	Holongan Drangen foom
253	Hong Kong DaYuLong International Trade Co., Limited
254	hshdhd
255	hu4717z
256	huaming fashion
257	huangjiahao
258	huangrunmei6608
259	huangxianhui66058
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261	huiodjl
262	huiyi00
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289	jiangjianliang123
290	Jiangqian5566
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292	jianlinsong wholeshop
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294	jiaojiaobaobei
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296	jiaqi668
297	Jindian pencerkou miland bear
298	jinyuexie
299	jiuyue1
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309	kakangdieyue
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316	Kidds candy
317	Knfeuifoa
318	kombat store
319	kongqiang fashion
320	kongxins
321	kongxuanyu1123
322	kudierg
323	kundee
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325	kunmings
326	laorengaoxiuping

327	laseloec
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328	leileionlineshop
330	lengwh88
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350	lihao461x
351	lihongwei66058
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356	limiaomiaog
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358	LimPrice
359	lindonghua fashion
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361	linlin135
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367	liucaie888

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371	liujiqlll
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374	liukewei12848
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377	liushuhua123456
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379	liuxiuhuan
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382	lixiuyang
383	liyang111
384	liyang136
385	Liyixiao521
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388	liyufu1734
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398	Lucky&weed7
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404	luoye88642
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410	mafeifei99
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419	Maria Ruelas
420	MartaOrtizssa
421	Mary Sarah
422	mawenwen Store
423	maxiango
424	maxianrui
425	mayinxueshishangdian
426	mayixinwaimaofuzhuang
427	maypx
428	maytggyy
429	mblnohnk
430	McGee House
431	mcidfnvuj
432	mcidfv
433	mclaytemtu
434	Meizaibay Pants
435	Melissa Grant
436	menglinfgsi5458
437	mengxeng94
438	mengxin1994
439	Mercy Fashion Store
440	metbvf
441	Miguelflores1912
442	Milk gril
443	MINT GREEN STORE
444	MIRROR.Store2035
445	MK7RVUUH
446	Mking
447	mom_xm
448	MONIXI
449	mpurfjk wholeshop

450	muguizhi
451	MyBufanterStore
452	myoo77
453	najingqi
454	nana6688
455	Nanhoely Pants
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488	pianpiancai
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493	Pocket Department Store
494	pototstore
495	principle of good faith
496	Print Canvas Shop
497	printzhu2018
498	pudukenliu
499	Pull the board
500	pursue dream
501	qear2874
502	QFZ
503	qianbaolin0514
504	qiangwei fashion
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506	qingpenty
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508	qingshaonian959600
509	qiushu
510	Qixing trading Co.,LTD
511	qmkbppj shopping
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514	qunwuduxiu
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516	Rachel19
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518	rainbow trendsetter
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524	RGDVCVXE
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526	Robin Howard
527	romantia
528	rongery
529	ronggangzaoxing
530	RongxuStore
531	Rosalyn1

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532	RUIRUIGOUWU888
533	\$45\$4\$52
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535	sajhg
536	Sandra Carrollp
537	sanlongou
538	sanmekegerin
539	Sara P Burnett
540	sdggty
541	sedfs567fh
542	sexean3
543	shajeuhua
544	shangzhihao1
545	shanshandedian
546	shantoushichaonanqusimapuyuanxinglvyouyongpinchang
547	shanyuling
548	shaohuabufu
549	shenjianmei fashion
550	shenpohuang21
551	shenyang0503
552	shenzhenqianhaicoltd
553	shenzhenshinenghuimaoyiyouxiangongsi
554	SHIFANJI
555	shihongfang123
556	Shihuizi001
557	shilei0622
558	Shine Meteor
559	shiqiangyou2002
560	ShitanhanlV
561	shitoutiaosu
562	shiyan55667
563	shiyuanfang
564	shizhengzhang fashion store
565	shuadanzhengqian88@163.com
566	shuangqiongmeil
567	sjeity
568	smallfacto
569	Smilelikeflower
570	smlie shop
571	snotheah
572	Songchenhui820

573	songweixinshop
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575	soul of anime
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580	strangertyuy
581	Strong road
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585	suieuouer
586	sunmingtong34683164
587	sunweiwei88
588	SuoSheng good
589	Super Newness Store
590	suppopshopwill
591	suquesh
592	surprise ping
593	suuyuejr
594	sweetqueen
595	SYBELAR
596	Tamara Kennedy
597	tangsiyuan916616
598	Tangziaohong6678
599	tanhuali513741
600	tanxueying