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

TOMMY HILFIGER LICENSING LLC, CALVIN KLEIN TRADEMARK TRUST and CALVIN KLEIN, INC.,

Plaintiffs,

v.

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

Defendants.

Case No. 21-cv-03915

Judge Charles P. Kocoras

Magistrate Judge M. David Weisman

## PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiffs Tommy Hilfiger Licensing LLC's, Calvin Klein Trademark Trust's and Calvin Klein, Inc.'s (collectively, "Plaintiffs") Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS Plaintiffs' Motion for Entry of a Preliminary Injunction in its entirety against the fully interactive, e-commerce stores<sup>1</sup> operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (the "Seller Aliases").

THIS COURT HEREBY FINDS that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars, and

<sup>&</sup>lt;sup>1</sup> The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces and Domain Names.

have sold products using counterfeit and infringing versions of Plaintiffs' federally registered trademarks ("Plaintiffs' Trademarks") to residents of Illinois. A list of Plaintiffs' Trademarks is included in the below chart.

Registration No.	Trademark	Goods and Services
1,398,612	TOMMY HILFIGER	For: clothing for men and women: namely, shirts, pants, jackets, sweaters, shorts, belts, vests, sport jackets, coats, rain coats, parkas in class 025.
1,738,410	TOMMY HILFIGER	For: clothing for men, namely, shirts, sweaters, pants, sweatshirts, shorts, sport jackets, parkas, bathing suits, vests in class 025.  For: retail clothing store services in class 042.
1,833,391	TOMMY HILFIGER	For: ties, socks, suspenders, hats, caps, suits and blazers in class 025.
1,995,802	TOMMY HILFIGER	For: deodorants and soaps for personal use in class 003.  For: articles of leather and imitation leather, namely, wallets, credit card cases, billfolds, umbrellas and travelling bags in class 018.  For: bathrobes, tuxedos, pajamas, underpants and undershirts in class 025.
2,103,148	TOMMY HILFIGER	For: eyewear, namely, eyeglasses, sunglasses and eyeglass frames and lenses and eyewear accessories, namely, cases and holders in class 009.

Registration No.	Trademark	Goods and Services
2,162,940	TOMMY HILFIGER	For: jewelry made of precious and non-precious metals and stones, namely, cuff- links, and bracelets in class 014.  For: footwear, namely, shoes, boots, sneakers, sandals and slippers in class 025.
2,485,457	TOMMY HILFIGER	For: jewelry, namely, necklaces, and rings in class 014.  For: pillows in class 020.
2,617,339	TOMMY HILFIGER	For: watches in class 014.
2,389,024	TOMMY	For: clothing for men, women and children, namely, t-shirts, sweatshirts, sweaters, jackets, coats, jeans, and caps in class 025.
2,475,142	TOMMY	For: full line of apparel and headwear in class 025.
2,772,857	TOMMY	For: handbags in class 018.
3,164,348	HILFIGER	For: clothing, namely, shirts, t-shirts, sweatshirts, sweaters, shorts, sweatpants, blazers, pants, jeans, suits, vests, jackets, coats, parkas, ponchos, swimwear, swim trunks, rainwear, wind resistant jackets, underwear, belts, hats, caps, scarves, boxer shorts, shoes, boots, sneakers, sandals, and gloves in class 025.
2,899,046	HILFIGER DENIM	For: clothing, namely, shirts, t-shirts, sweatshirts, tank tops, sweaters, turtlenecks, shorts, sweatpants, blazers, pants, jeans, skirts, suits, overalls, dresses, vests, jackets, coats, parkas, ponchos, swimwear, bikinis, swim trunks, overcoats, belts, hats, wool

Registration No.	Trademark	Goods and Services
		hats, caps, scarves, and gloves in class 025.
2,563,735	TH	For: Jewelry and watches in class 014.
2,612,455	TH	For: full line of apparel in class 025.
2,697,281	TH	For: Full line of handbags, backpacks, and cosmetic bags sold empty in class 018.
3,084,022	TH	For: Eyeglasses, sunglasses and frames for eyeglasses in class 009.
1,460,988		For: clothing for men and women, namely, shirts, pants, jackets, sweaters, shorts, belts, vests, sport jackets, coats, rain coats, parkas in class 025.
1,727,740		For: clothing for men namely, shirts, sweaters, sportcoats, pants, sweatshirts, shorts, sport jackets, raincoats, parkas, overcoats, bathing suits, vests, turtlenecks; clothing for boys, namely, shirts, sweaters, sportcoats, pants, sweatshirts, shorts, sport jackets, parkas, bathing suits, vests in class 025.  For: retail clothing store services in class 042.
1,808,520		For: socks, ties, hats, caps and blazers in class 025.
2,030,406		For: cologne, eau de toilette, shaving lotion, deodorant and soap for personal use in 003.

Registration No.	Trademark	Goods and Services
110.		For: articles of leather and imitation leather, namely wallets, credit card cases, billfolds, umbrellas and travelling bags in class 018.
		For: bathrobes, tuxedos, pajamas, underpants, undershirts and suspenders in class 025.
2,213,511		For: footwear, namely, shoes, boots, sneakers, sandals and slippers in class 025.
2,063,504		For: eyewear, namely, eyeglasses, sunglasses and eyeglass frames and lenses and eyewear accessories, namely, cases and holders in class 009.
		For: soaps; perfumery; colognes; toilet water; perfumes, fragrances for personal use; lotions for skin care; antiperspirants; deodorants for personal use in 003.
4,745,262	T O M M Y <b>⊐</b> HILFIGER	For: optical goods, namely, spectacles, spectacle glasses, sunglasses, eyeglass cases and sunglasses cases, carrying cases and holders for portable computers and mobile phones, magnetic coded cards, namely, gift cards in class 009.
		For: jewelry, namely, bracelets, necklaces, rings, earrings, cufflinks, horological and chronometric instruments, namely, watches, wrist watches, straps for wrist watches in class 014.  For: all purpose sports bags and athletic bags; overnight bags; book bags; tote bags; travelling bags; backpacks; handbags; luggage; suitcases; purses; briefcases; travel

Registration No.	Trademark	Goods and Services
		bags; duffel bags and beach bags, school bags; garment bags for travel; overnight cases, clutch bags; travel kit bags sold empty; suitcases with wheels attached; billfolds; wallets, pocket wallets, change purses, coin purses, credit card cases of leather; leather credit card wallets; name card cases; cosmetic cases sold empty; leather cases for cosmetics sold empty; umbrellas in class 018.  For: fabrics and textile goods, namely, household linen, bed linen, bath linen, bed sheets, pillow shams, pillow cases, bed blankets, comforters, quilts, bedspreads, bed covers, duvet covers, duvets, dust ruffles, mattress covers, towels, bath towels, beach towels, face cloths, shower curtains, handkerchiefs in class 024.
		For: clothing for men, women and children and infants, namely, shirts, golf shirts, t-shirts, polo shirts, knit tops, woven tops, sweatshirts, tank tops, sweaters, blouses, jerseys, turtlenecks, shorts, sweatpants, warmup suits, blazers, sport coats, trousers, jeans, skirts, dresses, suits, overalls, jumpers, vests, jackets, coats, raincoats, parkas, ponchos, swimwear, bikinis, swim trunks, overcoats, rainwear, wind resistant jackets, sleepwear, pajamas, bathrobes, underwear, lingerie, boxer shorts, belts made of leather, ties; headgear, namely, hats, wool hats, caps, visors, headbands, ear muffs; scarves, shawls, cloth bibs; footwear, gym shoes, sneakers, socks, hosiery, shoes, boots, beach shoes, sandals, slippers, gloves, suspenders; layettes in class 025.

Registration No.	Trademark	Goods and Services
		For: retail department store services, online retail department store services, online retail outlet services featuring perfumery, cosmetics, clothing, footwear, headgear, textile goods, goods made of leather or imitation of leather, bags, eyewear, jewellery, watches and horological and chronometric instruments, household accessories, and home items in class 035.
3,264,718	Ħ	For: clothing for men, women and children, namely, shirts, golf shirts, T-shirts, sweatshirts, tank tops, sweaters, jeans, vests, jackets, coats, parkas, underwear, scarves in class 025.
3,264,715	H	For: handbags in class 018.
1,993,879	CALVIN KLEIN	For: watches and jewelry in class 014.
1,418,226	CALVIN KLEIN	For: eyeglass frames and sunglasses in class 009.
2,069,292	CK CALVIN KLEIN JEANS	For: women's, men's, boys and girls wearing apparel, namely, shirts, T-shirts, tank tops, blouses, jackets, sport coats, pants, dresses, shorts, walking shorts, skirts, jeans, gloves, suits, blazers, clothing belts, socks, tights, hats; outerwear, namely, jackets, coats, vests, sweaters, shearling, shearling jackets, rain wear, rain coats, capes, ponchos, warm-up suits, scarves, shawls, and clothing ties in class 025.

Registration No.	Trademark	Goods and Services
		For: advertising agencies and developing promotional campaigns for businesses in class 035.
		For: design services for others in the field of clothing and retail boutique store services in class 042.
2,314,144	CK	For: jewelry and watches in class 014.
1,932,699	Calvin Klein	For: briefs, boxer shorts, athletic shirts and bottoms, t-shirts and tank tops, undershirts, underpants and undershirts, robes, knitted and woven sleepwear, namely sleep shirts, pajama tops, pajama bottoms, smoking jackets, knitted and woven loungewear, including lounging pants and tops, and lounge jackets in class 025.
1,819,048	Calvin Klein	For: men's wearing apparel; namely, suits, sports jackets; blazers, dinner jackets, pants, jeans, outer coats, raincoats, shirts, vests, sweaters, ties, belts; women's wearing apparel; namely, jeans, and gloves; children's wearing apparel; namely, dresses, skirts, jeans and shirts in class 025.
1,633,261	Calvin Klein	For: men's and boys' underwear and men's and boys' shorts; women's and girls' underwear (including brassieres and underpants); women's nightgowns in class 025.
1,604,663	Calvin Klein	For: women's handbags, wallets, billfolds, french purses, briefcase type leather portfolios and briefcase type leather organizer, key case, key fobs, change purses, luggage, vanity cases, overnight cases, duffle bags, suit bags, tote bags, trunks, briefcases, attaché cases and suit cases in class 018.

cK	For: eyeglass frames, sunglasses in class 009.  For: clothing caps and hats in class
CK	<del>-</del> -
	025.
	For: advertising agencies and developing promotional campaigns for businesses in class 035.
	For design for others in the field of clothing and retail clothing boutiques in class 042.
	For: eyeglass frames, sunglasses in class 009.
CK	For: watches and clocks in class 014.
	For: clothing, footwear and headwear for women, men, boys and girls, namely, jump suits, shirts, blouses, jackets, bathing suits, pants, belts, shorts, warm-up suits, sweatpants and sweatshirts, walking shorts, jeans, knitted tops, stockings, tights, hats, caps, coats, outer coats, sweater, skirts, coats, t-shirts, beach and swimming cover-ups, tank tops, camisoles; tennis and golf apparel, namely, dresses, tops, skirts, pants, and shorts; footwear, namely, shoes, active sport shoes, sneakers, boots, slippers; blazers, pants, socks in class 025.  For: advertising agencies and developing promotional campaigns
	for businesses in class 035.  For: design for others in the field of clothing and retail clothing boutiques
	cK

Registration No.	Trademark	Goods and Services
2,080,100	CK	For: women's, men's, boys and girls wearing apparel, namely, shirts, t-shirts, jump suits, tank tops, blouses, jackets, bathing suits, beach and swimming cover-ups, pants, dresses, shorts, walking shorts, skirts, jeans, gloves, sports jackets, blazers, belts, socks, stockings, tights, hats, outerwear, namely jackets, coats, sweaters, rainwear, raincoats, capes, ponchos, shoes, boots, slippers, tennis and golf dresses, tennis and golf shorts, warm-up suits, scarves, shawls in class 025.
2,076,377		For: handbags, wallets, key cases, change purses, cosmetic bags and pouches sold empty, briefcase-type portfolios, suit bags, trunks for traveling, suitcases, umbrellas, billfolds, duffle bags, tote bags, briefcases and attaché cases, luggage, overnight cases, toilet kits sold empty, credit card holders, business card holders, eyeglass cases made from leather or imitation thereof in class 018.
2,074,471		For: men's underwear, sleepwear and loungewear products, namely briefs, boxer shorts, athletic shirts and bottoms, t-shirts and tank tops, undershirts, underpants and undershirts, robes, knitted and woven sleepwear, namely sleep shirts, pajama tops, pajama bottoms, breakfast jackets, smoking jackets, bed jackets and cover-ups, knitted and woven loungewear, including lounging pants and tops, and lounge jackets; boy's underwear, namely briefs and boxer shorts in class 025.

Registration No.	Trademark	Goods and Services
2,064,064		For: women's and girl's intimate apparel, sleepwear and loungewear, bodywear, namely foundations, bras, girdles, garter belts, one piece bra and girdle, corselettes, body stockings, control briefs, control hipsters, control bikinis, bra slips, bra top camisoles, waist cinchers, bustiers, merry widows, camisettes, leotards and unitards, daywear, namely culottes, bikinis, hipsters, briefs, slips, blouse-slips, camisole-slips, chemise slips, culotte slips, evening slips, maternity slips, panty slips, princess slips, shadow panel slips, strapless slips, suite slips, tailored slips, half-slips, petti-slips, bra-slips, chemises, teddies, camisoles, bra top camisoles, bralettes, tap pants and petti-pants, daywear, loungewear, sleepwear and bodywear, namely nightgowns, toga nightgowns, night shirts, pajamas, shortie pajamas, baby doll pajamas, T-shirt pajamas, French maid sleepers, harem pajamas, hostess culottes, lounging pajamas, rompers, sleep shorts, peignoirs, bed jackets, caftans, jumpsuits, teddies, bathrobes, dressing gowns, kimonos, housecoats, beach togas, beach wrap-ups, breakfast coats, brunch coats, hooded bathrobes, dusters, hostess robes, kabuki robes, lounging robes and monk's robes, bra tops, crop tops and leggings, excluding women's hosiery in class 025.
2,192,526	Galvina Klein	For: watches, excluding (14k and 18k gold jewelry) in class 014.

Registration No.	Trademark	Goods and Services
2,144,299	Calvin Klein	For: eyeglass frames and sunglasses in class 009.
2,142,329	Calvinklein	For: handbags, wallets, keycases, change purses, cosmetic cases sold empty, briefcase-type portfolios, suit bags, luggage trunks, suitcases, umbrellas, billfolds, duffelbags, totebags, briefcases and attaché cases, luggage and overnight cases in class 018.
1,951,987	(alvinKlein	For: handbags, wallets, key cases, change purses, cosmetic bags and pouches sold empty, briefcase-type portfolios, suit bags trunks for traveling, suitcases, umbrellas, billfolds, duffle bags, tote bags, briefcases and attaché cases, luggage, overnight cases in class 018.
1,810,850	Galvinklein	For: women's, men's, boys and girls wearing apparel; namely, shirts, blouses, jackets, bathing suits, beach and swimming cover-ups, pants, dresses, shorts, skirts, jeans, gloves, suits, sports jackets, belts, socks, underwear, stockings, tights, hats, outerwear; namely, coats and vests, sweaters, T-shirts, rainwear, raincoats, tank tops, shoes, boots, slippers, blazers, bras, nightgowns, robes, scarves and shawls in class 025.

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 Plaintiffs'

previously granted Motion for Entry of a Temporary Restraining Order establishes that Plaintiffs have demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Plaintiffs will suffer irreparable harm if the injunction is not granted. Specifically, Plaintiffs have proved a *prima facie* case of trademark infringement because (1) Plaintiffs' Trademarks are distinctive marks and are registered with the U.S. Patent and Trademark Office on the Principal Register, (2) Defendants are not licensed or authorized to use any of Plaintiffs' Trademarks, and (3) Defendants' use of Plaintiffs' Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with Plaintiffs. Furthermore, Defendants' continued and unauthorized use of Plaintiffs' Trademarks irreparably harms Plaintiffs through diminished goodwill and brand confidence, damage to Plaintiffs' reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Plaintiffs have 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. As such, this Court orders that:

- Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be preliminarily enjoined and restrained from:
  - a. using Plaintiffs' Trademarks 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 Plaintiffs' product or not authorized by Plaintiffs to be sold in connection with Plaintiffs' Trademarks;

- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Plaintiffs' product or any other product produced by Plaintiffs, that is not Plaintiffs' or not produced under the authorization, control or supervision of Plaintiffs and approved by Plaintiffs for sale under Plaintiffs' Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiffs, or are sponsored by, approved by, or otherwise connected with Plaintiffs;
- d. further infringing Plaintiffs' Trademarks and damaging Plaintiffs' goodwill; and
- e. manufacturing, 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 Plaintiffs, nor authorized by Plaintiffs to be sold or offered for sale, and which bear any of Plaintiffs' trademarks, including the Plaintiffs' Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof.
- 2. The domain name registries for the Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, within ten (10) business days of receipt of this Order, shall, at Plaintiffs' choosing:
  - a. unlock and change the registrar of record for the Domain Names to a registrar of Plaintiffs' selection until further ordered by this Court; or
  - b. disable the Domain Names and make them inactive and untransferable until further ordered by this Court.
- 3. The domain name registrars, including, but not limited to, GoDaddy Operating Company, LLC ("GoDaddy"), Name.com, PDR LTD. d/b/a PublicDomainRegistry.com ("PDR"),

and Namecheap Inc. ("Namecheap"), within ten (10) business days of receipt of this Order, shall take any steps necessary to transfer the Domain Names to a registrar account of Plaintiffs' selection so that the Domain Names can be redirected or disabled until further ordered by this Court.

- 4. Upon Plaintiffs' request, any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of the Online Marketplaces and Domain Names, including, without limitation, any online marketplace platforms such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), and Dhgate, (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Plaintiffs 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, and all associated e-mail addresses;
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names; and
  - c. 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, PayPal, Inc. ("PayPal"), Alipay, Alibaba, Ant Financial Services Group ("Ant Financial"), Wish.com, Amazon Pay, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

- 5. Upon Plaintiffs' request, those with notice of the injunction, including the Third Party Providers as defined in Paragraph 4, shall, within ten (10) business days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Plaintiffs' Trademarks.
- 6. Defendants shall be temporarily and preliminarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 7. Any Third Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within ten (10) business days of receipt of this Order:
  - a. locate all accounts and funds connected to the Seller Aliases, Online Marketplaces and Domain Names, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in Exhibits 2 and 3 to the Declaration of Alastair Gray, Exhibits 5 and 6 to the Declaration of Dawn Buonocore-Atlas, and any e-mail addresses provided for Defendants by third parties; 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. Plaintiffs are authorized to issue expedited written discovery, pursuant to Federal Rules of Civil Procedure 33, 34 and 36, related 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, including any and all associated e-mail addresses; and
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names.

Plaintiffs are authorized to issue any such expedited discovery requests via e-mail.

Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

9. Plaintiffs may provide notice of these proceedings to Defendants, including service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order and other relevant documents on a website to which the Domain Names which are transferred to Plaintiffs' control will redirect, or by sending an e-mail to the e-mail addresses identified in Exhibits 2 and 3 to the Declaration of Alastair Gray, Exhibits 5 and 6 to the Declaration of Dawn Buonocore-Atlas and any e-mail addresses provided for Defendants by third parties that includes a link to said website. The Clerk of the Court is directed to issue a single original summons in the name of "The Partnerships and all other Defendants identified in the Complaint" that shall apply to all

Case: 1:21-cv-03915 Document #: 38 Filed: 08/25/21 Page 18 of 24 PageID #:2121

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. Schedule A to the Complaint [2], Exhibits 2 and 3 to the Declaration of Alastair Gray [15]

and [16], Exhibits 5 and 6 to the Declaration of Dawn Buonocore-Atlas [18] and [19], and

the TRO [27] are unsealed.

11. Any Defendants that are subject to this Order may appear and move to dissolve or modify

the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and

Northern District of Illinois Local Rules.

12. The \$10,000 bond posted by Plaintiffs shall remain with the Court until a Final disposition

of this case or until this Preliminary Injunction is terminated.

IT IS SO ORDERED.

Dated: August 25, 2021

Charles P. Kocoras

United States District Judge

## Tommy Hilfiger Licensing LLC, et al. v. The Partnerships and Unincorporated Associations Identified on Schedule "A" - Case No. 21-cv-03915

## **Schedule A**

1 calvinkleinonderbroeken.com 3 calvinkleinonlineus.com 5 calvinkleinsaleireland.com 7 tommyhilfigerireland.top 9 tommyhilfigersouthafrica.com 11 ademobenin.com 13 calvinkleinchlie.com 15 fashion-italy.boutique 17 hilfigerindia.com	
5 calvinkleinsaleireland.com 7 tommyhilfigerireland.top 9 tommyhilfigersouthafrica.com 11 ademobenin.com 13 calvinkleinchlie.com 15 fashion-italy.boutique 17 hilfigerindia.com	
7 tommyhilfigerireland.top 9 tommyhilfigersouthafrica.com 11 ademobenin.com 13 calvinkleinchlie.com 15 fashion-italy.boutique 17 hilfigerindia.com	
9 tommyhilfigersouthafrica.com 11 ademobenin.com 13 calvinkleinchlie.com 15 fashion-italy.boutique 17 hilfigerindia.com	
11 ademobenin.com 13 calvinkleinchlie.com 15 fashion-italy.boutique 17 hilfigerindia.com	
<ul><li>13 calvinkleinchlie.com</li><li>15 fashion-italy.boutique</li><li>17 hilfigerindia.com</li></ul>	
15 fashion-italy.boutique 17 hilfigerindia.com	
17 hilfigerindia.com	
10 ladabatanina as:::	
19 ledphotoring.com	
21 nobusemina.com	
23 redbaja.com	
25 sayyesclothing.com	
27 shirtssaleusa.com	
29 thehighlandapts.com	
31 thnyss.top	
33 trivasio.com	
35 wersar.com	
37 Tommy-Hilfigers Store	
39 APLSwimwear Store	
41 Shop4299042 Store	
43 bao li Store	
45 Cochic Store	
47 Awe-inspiring Store	
49 Shop5962039 Store	
51 lvOnline, Store	
53 kAIXING Glasses Store	
55 LvOnline Store	
57 Shop910988058 Store	
59 Ypanlkar Glasses Store	
61 chiclover Store	
63 Shop12141391 Store	
65 landlady Store	
67 Children's baby Store	
69 21centuryboy Store	

No.	Seller Aliases
2	calvinkleinonlinesrbija.com
4	calvinkleinrebajas.com
6	ckonlineaustralia.com
8	tommyhilfigermexico.com
10	tommysouthafrica.com
12	brandbund.online
14	disfood.store
16	greatimeshopping.com
18	hilfigermalaysia.com
20	lighttoggl.store
22	posstory.com
24	risparmiaconstileshop.com
26	seegana.com
28	shoppipro.com
30	thnys.top
32	toswers.com
34	wegotbrands.com
36	IAGREE online Store
38	Retro Goddess Store
40	LZVCOY Store
42	Lipswag Styles Store
44	Shengxing Store
46	FNOCE Store
48	Noger phone fitting 23 Store
50	Shop719126 Store
52	JISOO Store
54	WANGCHAI888 Store
56	Shop910554236 Store
58	Bao Zhuo Store
60	Shop911207201 Store
62	XINGER Store
64	Kesumvin Store
66	MENGYAN Store
68	hkjk456 Store
70	89888 Store

No.	Seller Aliases
71	X88888Q Store
73	AiYiran Store
75	LemonMM Store
77	ac0727-luggage-family Store
79	100% cotton 16 Store
81	Ivlu Store
83	zhx2668808 Store
85	Children's amusement park Store
87	Stephanie Clothes Store
89	AOTUOSI Store
91	Rick men's Store
93	at your service Store
95	100% cotton T-shirt 135 Store
97	Exotic costumes Store
99	Bayote Store
101	Men trend clothes Store
103	zkuku11221122 Store
105	Cheap The real thing 01 Store
107	wzl Store
109	Deema Harajuku Store
111	5555555555555555555
	55555555555555555555555555555555555555
113	Suit shop Store
115	PlusQueen Store
117	zkuku112211 Store
119	a#hdfbdf161 Store
121	Preface to the West Building Store
123	YF good friend Store
125	FGBEENTRILL Store
127	zhengshiwu Store
129	yangying881211 Store
131	fzs369369369 Store
133	Handsome child and beautiful girl clothes
	shop Store
135	wu36082 Store
137	2021teens Store
139	Men's wardrobe 520 Store
141	fzfs1978198412151015 Store
143	Fashionable Men's Wardrobe Store
145	Aaete No. 20 Store

No.	Seller Aliases
72	factory direct sales 2021 Store
74	Trendy beard Store
76	Classic store Store
78	Among us kids Hoodie sets Store
80	Casual 888 Store
82	Bingzi Store
84	Shop911766538 Store
86	wangyifa Store
88	FEIZHUO Store
90	caotai Store
92	FHMR BB Store
94	100% cotton T-shirt 58 Store
96	Shop91152021 store Store
98	xy123488 Store
100	Century Alliance Store
102	Tiancheng store Store
104	All seasons spring Store
106	warm sunburst 53719 Store
108	Fage clothes store Store
110	Qin 0721 Store Store
112	TOMMY- Store
114	DISMISSED
116	Men's suit 888 Store
118	UNIQ Store Store
120	DeerDenseLL Store
122	chuyuanxuan1992 Store
124	Aliang Store
126	Childlike2000 Store
128	Athlete's No. 3 Store Store
130	ZHOU Dropshiping Store
132	Children's suit world Store
134	Yaoyang Commercial Bank Store
136	XIUXIANFUSHI6309 Store
138	ywq1985 Store
140	Dave-Sportswear Store
142	xy369 Store
144	Children's Sweatshirt Store
146	18888888888 Store

No.	Seller Aliases
147	0208 Store
149	All things grow Store
151	Sofitel 1957 Store
153	xiangyuanfuzhuang Store
155	azlfdfds5245 Store
157	xiao luo luo Store
159	1233211234567 Store
161	WHEAT DD Store
163	Mr. Xia Store
165	JCYLQ521 Store
167	xmhanchaoD Store
169	KALEWENKING Store
171	854867 Store
173	GWYY Store
175	JZ888 Store
177	YandX Store
179	New store in 2021 Store
181	Sofitel 1959 Store
183	ljwfushi Store
185	liubowen8886 Store
187	100% cotton T-shirt MX Store
189	LLWAN Store
191	ggck_belt
193	brawnety.com
195	fortuneal.com
197	impressivets.com
199	reasonees.com
201	spectacularcy.com
203	wantcloth.com
205	zealoused.com
207	thehighlandapts.com

No.	Seller Aliases
148	Asmsm Store
150	Cc888999 Store
152	15888851 Store
154	Printed clothes shop 111 Store
156	xmbaichangdaD Store
158	Chile life Store
160	fzyangqianguanC Store
162	qzweishufuE Store
164	Men's Wardrobe No. 8 Store
166	Le Maidi Store
168	anutr353238 Store
170	okoktop Store
172	Chinatownshopping Store
174	ttppoo123 Store
176	Trendy Shoe Shop Store
178	20210608 Store
180	Hoodies and T-shirts for men
	Store
182	hefangfushi02 Store
184	linhao Store
186	aoao123 Store
188	Good Tees Store
190	HZUK
192	ardented.com
194	finishety.com
196	heartfeltity.com
198	kindnessed.com
200	soaringes.com
202	Teeground.com
204	welcomeal.com
206	ademobenin.com

No.	Online Marketplaces
1	aliexpress.com/store/1823215
3	aliexpress.com/store/2354002
5	aliexpress.com/store/3752001
7	aliexpress.com/store/4768024
9	aliexpress.com/store/5039152
11	aliexpress.com/store/5129077

No.	Online Marketplaces
2	aliexpress.com/store/2187045
4	aliexpress.com/store/2926066
6	aliexpress.com/store/4299042
8	aliexpress.com/store/5019136
10	aliexpress.com/store/5060167
12	aliexpress.com/store/5429236

No.	Online Marketplaces
13	aliexpress.com/store/5881316
15	aliexpress.com/store/719126
17	aliexpress.com/store/910351233
19	aliexpress.com/store/910456177
21	aliexpress.com/store/910554236
23	aliexpress.com/store/911121124
25	aliexpress.com/store/911207201
27	aliexpress.com/store/911252268
29	aliexpress.com/store/911327230
31	aliexpress.com/store/911607260
33	aliexpress.com/store/911666267
35	aliexpress.com/store/911682024
37	aliexpress.com/store/911719249
39	aliexpress.com/store/911740008
41	aliexpress.com/store/911748866
43	aliexpress.com/store/911751982
45	aliexpress.com/store/911759939
47	aliexpress.com/store/911761261
49	aliexpress.com/store/911766538
51	aliexpress.com/store/911773336
53	aliexpress.com/store/911777063
55	aliexpress.com/store/911778567
57	aliexpress.com/store/911784107
59	aliexpress.com/store/911789758
61	aliexpress.com/store/911792530
63	aliexpress.com/store/911794778
65	aliexpress.com/store/911798819
67	aliexpress.com/store/911817365
69	aliexpress.com/store/911831302
71	aliexpress.com/store/911840278
73	aliexpress.com/store/911872029
75	aliexpress.com/store/911876295
77	aliexpress.com/store/911885347
79	DISMISSED
81	aliexpress.com/store/911928582
83	aliexpress.com/store/911928910
85	aliexpress.com/store/911929583
87	aliexpress.com/store/911931580
89	aliexpress.com/store/911933063
91	aliexpress.com/store/911934231

No.	Online Marketplaces
14	aliexpress.com/store/5962039
16	aliexpress.com/store/910339329
18	aliexpress.com/store/910363053
20	aliexpress.com/store/910544338
22	aliexpress.com/store/910988058
24	aliexpress.com/store/911127036
26	aliexpress.com/store/911224174
28	aliexpress.com/store/911273011
30	aliexpress.com/store/911606343
32	aliexpress.com/store/911653276
34	aliexpress.com/store/911670036
36	aliexpress.com/store/911717465
38	aliexpress.com/store/911737058
40	aliexpress.com/store/911745802
42	aliexpress.com/store/911750153
44	aliexpress.com/store/911759064
46	aliexpress.com/store/911760310
48	aliexpress.com/store/911766037
50	aliexpress.com/store/911770412
52	aliexpress.com/store/911774024
54	aliexpress.com/store/911778474
56	aliexpress.com/store/911783359
58	aliexpress.com/store/911788836
60	aliexpress.com/store/911790050
62	aliexpress.com/store/911793036
64	aliexpress.com/store/911798289
66	aliexpress.com/store/911814005
68	aliexpress.com/store/911827549
70	aliexpress.com/store/911832223
72	aliexpress.com/store/911851042
74	aliexpress.com/store/911873311
76	aliexpress.com/store/911880050
78	aliexpress.com/store/911896107
80	aliexpress.com/store/911902125
82	aliexpress.com/store/911928683
84	aliexpress.com/store/911929404
86	aliexpress.com/store/911930886
88	aliexpress.com/store/911932584
90	aliexpress.com/store/911933428
92	aliexpress.com/store/911934424

No.	Online Marketplaces
93	aliexpress.com/store/911934497
95	aliexpress.com/store/911935247
97	aliexpress.com/store/911936243
99	aliexpress.com/store/911936505
101	aliexpress.com/store/911936683
103	aliexpress.com/store/911938610
105	aliexpress.com/store/911941115
107	aliexpress.com/store/911943257
109	aliexpress.com/store/911958276
111	aliexpress.com/store/911963069
113	aliexpress.com/store/911968027
115	aliexpress.com/store/911969202
117	aliexpress.com/store/911978020
119	aliexpress.com/store/911991070
121	aliexpress.com/store/912019159
123	aliexpress.com/store/912024280
125	aliexpress.com/store/912025076
127	aliexpress.com/store/912027082
129	aliexpress.com/store/912027483
131	aliexpress.com/store/912028484
133	aliexpress.com/store/912056016
135	aliexpress.com/store/912060775
137	aliexpress.com/store/912061351
139	aliexpress.com/store/912061499
141	aliexpress.com/store/912066246
143	aliexpress.com/store/912070845
145	aliexpress.com/store/912120006
147	aliexpress.com/store/912131116
149	aliexpress.com/store/912142015
151	aliexpress.com/store/912174075
153	aliexpress.com/store/911836373
155	amazon.com/sp?seller=AW8EVHUTWUXF2
157	ardented.com
159	finishety.com
161	heartfeltity.com
163	kindnessed.com
165	soaringes.com
167	teeground.com
169	welcomeal.com
171	ademobenin.com

No.	Online Marketplaces
94	aliexpress.com/store/911935202
96	aliexpress.com/store/911936159
98	aliexpress.com/store/911936250
100	aliexpress.com/store/911936675
102	aliexpress.com/store/911938301
104	aliexpress.com/store/911940897
106	aliexpress.com/store/911941548
108	aliexpress.com/store/911945743
110	aliexpress.com/store/911960252
112	aliexpress.com/store/911964054
114	aliexpress.com/store/911968199
116	aliexpress.com/store/911971105
118	aliexpress.com/store/911982085
120	aliexpress.com/store/912018017
122	aliexpress.com/store/912023199
124	aliexpress.com/store/912024470
126	aliexpress.com/store/912026365
128	aliexpress.com/store/912027187
130	aliexpress.com/store/912027537
132	aliexpress.com/store/912030069
134	aliexpress.com/store/912058087
136	aliexpress.com/store/912061016
138	aliexpress.com/store/912061435
140	aliexpress.com/store/912065387
142	aliexpress.com/store/912068350
144	aliexpress.com/store/912073334
146	aliexpress.com/store/912129007
148	aliexpress.com/store/912132213
150	aliexpress.com/store/912163111
152	aliexpress.com/store/912187001
154	aliexpress.com/store/911931464
156	dhgate.com/store/21162523
158	brawnety.com
160	fortuneal.com
162	impressivets.com
164	reasonees.com
166	spectacularcy.com
168	wantcloth.com
170	zealoused.com
172	thehighlandapts.com

No.	Domain Names
1	calvinkleinonderbroeken.com
3	calvinkleinonlineus.com
5	calvinkleinsaleireland.com
7	tommyhilfigerireland.top
9	tommyhilfigersouthafrica.com
11	ademobenin.com
13	calvinkleinchlie.com
15	fashion-italy.boutique
17	hilfigerindia.com
19	ledphotoring.com
21	nobusemina.com
23	redbaja.com
25	sayyesclothing.com
27	shirtssaleusa.com
29	thehighlandapts.com
31	thnyss.top
33	trivasio.com
35	wersar.com

No.	Domain Names
2	calvinkleinonlinesrbija.com
4	calvinkleinrebajas.com
6	ckonlineaustralia.com
8	tommyhilfigermexico.com
10	tommysouthafrica.com
12	brandbund.online
14	disfood.store
16	greatimeshopping.com
18	hilfigermalaysia.com
20	lighttoggl.store
22	posstory.com
24	risparmiaconstileshop.com
26	seegana.com
28	shoppipro.com
30	thnys.top
32	toswers.com
34	wegotbrands.com