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-01104

Judge Martha M. Pacold

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 stores¹ operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (the "Seller Aliases").

THIS COURT HEREBY FINDS that, at this early stage, there is sufficient evidence that the court personal jurisdiction over the Defendants since it appears that 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

¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces and Domain Names.

shipping to the United States, including Illinois, accept payment in U.S. dollars, and have sold products using counterfeit and infringing versions of Plaintiffs' federally registered trademarks ("Plaintiffs' Trademarks") to residents of Illinois.

As other judges in this district have noted, there may be reason to question both the propriety of the joinder of all defendants in this one action and whether plaintiff genuinely intends to pursue an accounting (which plaintiff asserts as justification for an asset freeze), but at this preliminary stage, the court is persuaded that plaintiff has provided sufficient evidence of coordinated activity and the prospect of an accounting to justify the requested relief as to all defendants.

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.
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 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. 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	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 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, tshirts, polo shirts, knit tops, woven tops, sweatshirts, tank tops, sweaters, blouses, jerseys, turtlenecks, shorts, sweatpants, warm-up 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.

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		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		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. 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		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		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		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		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.
2,483,764		For: eyeglass frames, sunglasses in class 009. For: clothing caps and hats 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 in class 042.
	For: eyeglass frames, sunglasses in class 009.
	For: watches and clocks in class 014.
2,454,886	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 in class 042.
2,080,100	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 coverups, 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.
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	For: watches, excluding (14k and 18k gold jewelry) in class 014.
2,144,299	For: eyeglass frames and sunglasses in class 009.
2,142,329	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	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.
1,929,343	For: men's and boy'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 in class 025.
	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
1,810,850	jackets, belts, socks, underwear,
1,010,030	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:

- 1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be 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 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 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.

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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: April 2, 2021

/s/ Martha M. Pacold Martha M. Pacold United States District Judge

Tommy Hilfiger Licensing LLC, et al. v. The Partnerships and Unincorporated Associations Identified on Schedule "A" - Case No. 21-cv-01104

Schedule A

No.	Seller Aliases
1	calvinkleinoutlets.us
3	alba-radio.info
5	besafeonline.info
7	catstep.info
9	mediareich.info
11	clothing-nice.com
13	josephhilliman.com
15	chaletjardinsdulac.com
17	carmanconsultoria.com
19	bridgetburnquist.com
21	whateverwhereverwhenever.com
23	casalesantabarbara.com
25	tommyhilfigerclothing.us
27	hippotherapie.info
29	joeldurston1.com
31	bollywoodbhoot.com
33	noemicsergo.com
35	MAIJION Boutiques Store
37	hoozim Official Store
39	VEAMORS Sportswear Store
41	EXILIENSonline supermarket Store
43	Shop4225040 Store
45	Bellishly Official Store
47	BEACH GIRL Store
49	BABAONIU Baby House Store
51	Shop534563 Store
53	Dawa Fishing Store
55	My Little Princess Store
57	HKML Dropshipping Store
59	Safety Mask Supplies. Store
61	Shop5869706 Store
63	SHOPPING GOOD Store
65	Shop5891251 Store
67	Shop900236404 Store
69	Shop900240455 Store

No.	Seller Aliases
2	calvinkleinunderwears.us
4	ambientadores.info
6	casadiriposo.info
8	ibbetson.info
10	fightingartesgardner.com
12	thepartytucson.com
14	efendilerinsaat.com
16	nakedeyecreative.com
18	bassistgaryholder.com
20	riverregionfamily.com
22	eldfcomidamexicana.com
24	edenloveescort.com
26	hotcommodity.club
28	leiseberg.info
30	djwoodysurf.com
32	merci-bonsoir.com
34	AphroVenus Official Store
36	Raise Young Baby Mother Store
38	WGZNYN Official Store
40	Snordic Official Store
42	Buona Notte Store
44	Shop4542029 Store
46	GYJ C Store
48	Daiwai Angler Store
50	Mi Youpin homes Store
52	Shop5368120 Store
54	ZOGAA Men's Clothes Store
56	Shop5605496 Store
58	Bauhinia Hepburn Store
60	Shop5788287 Store
62	Shop5870217 Store
64	Shop5889841 Store
66	Oshare Store
68	Shop900237208 Store
70	Shop900247085 Store

71 Shop900250409 Store 73 Shop900253426 Store 75 Shop910327392 Store 77 Starcat Store 79 Greenwild Store 81 CHAIFENKO Second Store 83 Shop910566047 Store 85 Shop910730048 Store 87 SALAZAR Store 89 Shop910766009 Store 91 Shop910823002 Store 93 Shop910923027 Store 95 Little naughty- Store 97 Shop910968004 Store 98 Shop910977068 Store 101 10th Store 103 Shop911049224 Store 105 Shop911052002 Store 107 Zhou Li Store 109 YIPAIJIHE Store 111 Shop911085030 Store 112 Shop91117084 Store 113 Shop91117084 Store 114 Shop911120135 Store 115 Shop911120135 Store 116 Ouranos Store 117 Shop911130124 Store 118 Shop911181045 Store 119 Shop91118045 Store 120 Shop91118045 Store 131 Akazuki Store 132 Shop911181015 Store 133 Shop911181015 Store 134 Akazuki Store 135 Shop91125026 Store 137 Shop91125036 Store 138 Shop91125036 Store 139 brand-empire Store 137 Shop911250302 Store 148 Shop911260302 Store 149 Shop9112960304 Store 149 Shop9112960304 Store 149 Shop9112960304 Store	No.	Seller Aliases
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125 brand-empire Store 127 Shop911186045 Store 129 Shop911188161 Store 131 Akazuki Store 133 Shop911215026 Store 135 Shop911224038 Store 137 Shop911239113 Store 139 brand-empire2 Store 141 Shop911256316 Store 143 Shop911260302 Store 145 Shop911263029 Store 147 Shop911293004 Store 149 Shop911296134 Store	121	Ouranos Store
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135 Shop911224038 Store 137 Shop911239113 Store 139 brand-empire2 Store 141 Shop911256316 Store 143 Shop911260302 Store 145 Shop911263029 Store 147 Shop911293004 Store 149 Shop911296134 Store	131	Akazuki Store
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137 Shop911239113 Store 139 brand-empire2 Store 141 Shop911256316 Store 143 Shop911260302 Store 145 Shop911263029 Store 147 Shop911293004 Store 149 Shop911296134 Store		
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141 Shop911256316 Store 143 Shop911260302 Store 145 Shop911263029 Store 147 Shop911293004 Store 149 Shop911296134 Store		
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No.	Seller Aliases
72	Shop900250438 Store
74	Shop900254206 Store
76	Shop910334238 Store
78	OLOEY WOMEN Store
80	Shop910450135 Store
82	Shop910554107 Store
84	Shop910570356 Store
86	Shop910730151 Store
88	Shop910763017 Store
90	9th Store
92	Shop910895056 Store
94	Shop910928029 Store
96	Take up Store
98	Shop910974008 Store
100	Shop910988043 Store
102	Shop911038111 Store
104	Shop911051079 Store
106	Shop911056143 Store
108	Shop911062211 Store
110	Shop911067141 Store
112	Shop911109008 Store
114	Yimi 2 store Store
116	Shop911120105 Store
118	BeautySportWorld Store
120	Shop911125157 Store
122	Pyoungshoes Store
124	Shop911130298 Store
126	Shop911139160 Store
128	Shop911186265 Store
130	Shop911188162 Store
132	Shop911200029 Store
134	Shop911222149 Store
136	Shop911230088 Store
138	AI 666 Store
140	Shop911253334 Store
142	CKobj belt Store
144	Shop911260328 Store
146	Shop911284021 Store
148	Shop911294002 Store
150	Shop911303149 Store
152	Shop911382051 Store

No.	Seller Aliases
153	Shop911391016 Store
155	JING'STORE
157	zhengchunxian
159	yangna5
161	WHSDIDU
163	qiouqindiyun
165	daweim
167	xuymoon
169	ShicikejicXs
171	Joe Martello
173	dongbushichengshi
175	Sederneny Pants
177	lixiaohaya

No.	Seller Aliases
154	Shop911416131 Store
156	Fashion beauterful
158	jajdhajd
160	yuxiaotingzi
162	GPenglikeHome
164	fhreeowasd
166	Veimaiqur Jacket
168	XiedaopangyunkQ
170	Bolaka Centay Youmi Kusen Airpen
172	paobuninxing
174	Kristenio
176	Epsantools

No.	Online Marketplaces
1	aliexpress.com/store/125058
3	aliexpress.com/store/1819595
5	aliexpress.com/store/2135044
7	aliexpress.com/store/2697039
9	aliexpress.com/store/3240087
11	aliexpress.com/store/4542029
13	aliexpress.com/store/4805095
15	aliexpress.com/store/4871063
17	aliexpress.com/store/5023111
19	aliexpress.com/store/5368120
21	aliexpress.com/store/5585202
23	aliexpress.com/store/5605496
25	aliexpress.com/store/5721129
27	aliexpress.com/store/5788287
29	aliexpress.com/store/5870217
31	aliexpress.com/store/5889841
33	aliexpress.com/store/5967004
35	aliexpress.com/store/900237208
37	aliexpress.com/store/900247085
39	aliexpress.com/store/900250438
41	aliexpress.com/store/900254206
43	aliexpress.com/store/910334238
45	aliexpress.com/store/910437215
47	aliexpress.com/store/910450135
49	aliexpress.com/store/910554107
51	aliexpress.com/store/910570356

No.	Online Marketplaces
2	aliexpress.com/store/1496922
4	aliexpress.com/store/1859718
6	aliexpress.com/store/2385077
8	aliexpress.com/store/2796215
10	aliexpress.com/store/4225040
12	aliexpress.com/store/4648135
14	aliexpress.com/store/4817120
16	aliexpress.com/store/5003309
18	aliexpress.com/store/534563
20	aliexpress.com/store/5572078
22	aliexpress.com/store/5598179
24	aliexpress.com/store/5616058
26	aliexpress.com/store/5783323
28	aliexpress.com/store/5869706
30	aliexpress.com/store/5888559
32	aliexpress.com/store/5891251
34	aliexpress.com/store/900236404
36	aliexpress.com/store/900240455
38	aliexpress.com/store/900250409
40	aliexpress.com/store/900253426
42	aliexpress.com/store/910327392
44	aliexpress.com/store/910340299
46	aliexpress.com/store/910448253
48	aliexpress.com/store/910545399
50	aliexpress.com/store/910566047
52	aliexpress.com/store/910730048

No.	Online Marketplaces
53	aliexpress.com/store/910730151
55	aliexpress.com/store/910763017
57	aliexpress.com/store/910787036
59	aliexpress.com/store/910895056
61	aliexpress.com/store/910928029
63	aliexpress.com/store/910955013
65	aliexpress.com/store/910974008
67	aliexpress.com/store/910988043
69	aliexpress.com/store/911038111
71	aliexpress.com/store/911051079
73	aliexpress.com/store/911056143
75	aliexpress.com/store/911062211
77	aliexpress.com/store/911067141
79	aliexpress.com/store/911109008
81	aliexpress.com/store/911116128
83	aliexpress.com/store/911120105
85	aliexpress.com/store/911120210
87	aliexpress.com/store/911125157
89	aliexpress.com/store/911129175
91	aliexpress.com/store/911130298
93	aliexpress.com/store/911139160
95	aliexpress.com/store/911186265
97	aliexpress.com/store/911188162
99	aliexpress.com/store/911200029
101	aliexpress.com/store/911222149
103	aliexpress.com/store/911230088
105	aliexpress.com/store/911252098
107	aliexpress.com/store/911253334
109	aliexpress.com/store/911257279
111	aliexpress.com/store/911260328
113	aliexpress.com/store/911284021
115	aliexpress.com/store/911294002
117	aliexpress.com/store/911303149
119	aliexpress.com/store/911382051
121	aliexpress.com/store/911416131
123	wish.com/merchant/58b50a3d2a5b
125	2e1689ddadc7 wish.com/merchant/5ac0d479a71f
125	
	bf318959e2a8

No.	Online Marketplaces
54	aliexpress.com/store/910736064
56	aliexpress.com/store/910766009
58	aliexpress.com/store/910700009
60	aliexpress.com/store/910823002
62	-
64	aliexpress.com/store/910953034 aliexpress.com/store/910968004
66	aliexpress.com/store/910977068
68	aliexpress.com/store/911027006
70	aliexpress.com/store/911049224
72	aliexpress.com/store/911052002
74	aliexpress.com/store/911052002
76	aliexpress.com/store/911064163
78	aliexpress.com/store/911085030
80	aliexpress.com/store/91110220
82	aliexpress.com/store/911110220
84	aliexpress.com/store/911120135
86	aliexpress.com/store/911120133
88	aliexpress.com/store/911128012
90	aliexpress.com/store/911130124
92	aliexpress.com/store/911137235
94	aliexpress.com/store/911137233
96	aliexpress.com/store/911188161
98	aliexpress.com/store/911191076
100	aliexpress.com/store/911215026
102	aliexpress.com/store/911224038
104	aliexpress.com/store/911239113
106	aliexpress.com/store/911253083
108	aliexpress.com/store/911256316
110	aliexpress.com/store/911260302
112	aliexpress.com/store/911263029
114	aliexpress.com/store/911293004
116	aliexpress.com/store/911296134
118	aliexpress.com/store/911329172
120	aliexpress.com/store/911391016
122	amazon.com/sp?seller=AIM0YJ1TEYQ
	3D
124	wish.com/merchant/5a506b5d95ebe
	d2a3f3bc254
126	wish.com/merchant/5ac1def10e63fa
	25ba44ca41

No.	Online Marketplaces
127	wish.com/merchant/5adbfbccc7981
	70dbfddad69
129	wish.com/merchant/5d4d2fe71527
	54414a7e0b50
131	wish.com/merchant/5dd10d5baf8d
	a44654e9d4ca
133	wish.com/merchant/5df1e458bc94
	7302b428c325
135	wish.com/merchant/5e6cc7416bab
	207f8db64d39
137	wish.com/merchant/5e73415119f5
	670602b80bce
139	wish.com/merchant/5ea1092129e7
	8638e36fac24
141	wish.com/merchant/5f08b5fcc8217
	548f692d5a9
143	wish.com/merchant/5f4273d4c8e8
	b0995277a6c9

No.	Online Marketplaces
128	wish.com/merchant/5d4d100f83889
	747b477bfa1
130	wish.com/merchant/5dbba9f243177
	00bd6dbcfd1
132	wish.com/merchant/5de88f8e3bc4b3
	4040f39c98
134	wish.com/merchant/5e4a00b8b9fc2e
	f9a14be803
136	wish.com/merchant/5e6cc7d9eb2b3
	381a875943e
138	wish.com/merchant/5e91d9f2646cd4
	2b809a3796
140	wish.com/merchant/5edc43405c316
	de5afbb65fd
142	wish.com/merchant/5f1fde7d5a335f
	c641d2c5c2
144	wish.com/merchant/5f675a79471217
	552f52a8ad

No.	Domain Names
1	calvinkleinoutlets.us
3	alba-radio.info
5	besafeonline.info
7	catstep.info
9	mediareich.info
11	clothing-nice.com
13	josephhilliman.com
15	chaletjardinsdulac.com
17	carmanconsultoria.com
19	bridgetburnquist.com
21	whateverwhereverwhenever.com
23	casalesantabarbara.com
25	tommyhilfigerclothing.us
27	hippotherapie.info
29	joeldurston1.com
31	bollywoodbhoot.com
33	noemicsergo.com

No.	Domain Names
2	calvinkleinunderwears.us
4	ambientadores.info
6	casadiriposo.info
8	ibbetson.info
10	fightingartesgardner.com
12	thepartytucson.com
14	efendilerinsaat.com
16	nakedeyecreative.com
18	bassistgaryholder.com
20	riverregionfamily.com
22	eldfcomidamexicana.com
24	edenloveescort.com
26	hotcommodity.club
28	leiseberg.info
30	djwoodysurf.com
32	merci-bonsoir.com