

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

CHROME HEARTS LLC,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”

Defendants.

Case No. 21-cv-05778

Judge John Robert Blakey

PRELIMINARY INJUNCTION ORDER







THIS CAUSE being before the Court on Plaintiff Chrome Hearts LLC’s (“Plaintiff” or “Chrome Hearts”) Motion for Entry of a Preliminary Injunction, and this Court having considered the evidence before it hereby GRANTS Plaintiff’s 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 attached hereto (collectively, the “Seller Aliases”).




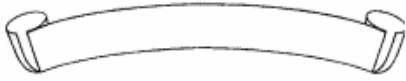



THIS COURT HEREBY FINDS that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. “In the context of cases like this one, that means a plaintiff must show that each defendant is actually 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 [infringing] 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).





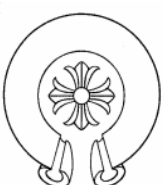


¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces and Domain Names.



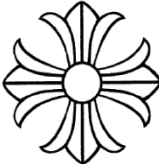





Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars, and have sold products using infringing and counterfeit versions of the CHROME HEARTS Trademarks to residents of Illinois (a list of which is included in the below chart). *See* [13] (Declaration of Mario Lejtman) ¶ 22; [14]; [15]. In addition, Plaintiff's screenshot evidence confirms that each Seller Alias does stand ready, willing, and able to ship its counterfeit goods to customers in Illinois. *Id.* Moreover, several Seller Aliases have in fact shipped counterfeit goods to Illinois. *Id.*







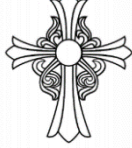
Registration Number	Trademark	Goods and Services
1,665,791	CHROME HEARTS	<p>For: jewelry, belt buckles made of precious metal, key rings made of precious metal, cufflinks, tie fasteners made of precious metal, brooches, necklaces and earrings in class 014.</p> <p>For: garment bags for travel, tote bags, shoulder bags, purses and luggage in class 018.</p> <p>For: clothing; namely, shirts, trousers, jackets, vests, chaps, men's and women's underwear, coats, clothing belts, gloves and boots in class 025.</p> <p>For: belt buckles not of precious metal and tie fasteners not of precious metal in class 026.</p>
2,192,539	CHROME HEARTS	For: retail store services in the field of general merchandise in class 042.

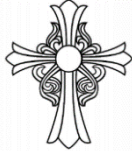
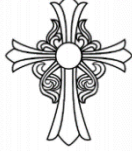
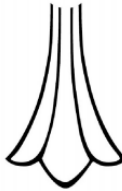
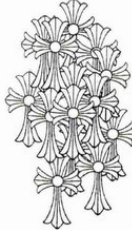
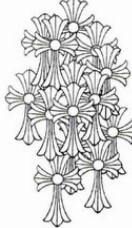

Registration Number	Trademark	Goods and Services
5,186,592		For: eyewear, namely, eyeglasses, sunglasses, their parts and cases; phone accessories, namely, phone straps, pouches specially adapted for holding phones, phone cases, charms for phones, tablet cases and laptop cases; pre-recorded CDs and DVDs in the field of music in class 009.
5,186,676		For: incense holders in the nature of incense burners in class 021.
4,501,511		For: retail store services in the fields of general merchandise, namely, clothing, jewelry, handbags, eyewear, toys, furniture and household products in class 035.
4,510,061		For: jewelry, namely, earrings, rings, bracelets, cuff bracelets, necklaces, pendants, brooches, cuff links, tie fasteners and watch bracelets, key rings of precious metals in class 014.
2,118,026		For: leather bags, namely, handbags, back packs, tote bags, shoulder bags, wallets and luggage in class 018. For: men's and women's clothing, namely, pants, shirts, tee shirts, sweaters, jackets, vests, chaps, skirts, belts, underwear, gloves, shoes and boots in class 025.
2,216,570		For: jewelry made wholly or in part of precious metal; namely, rings, earrings, necklaces, bracelets, cuff links, key rings, belt buckles, watches and tie fasteners in class 014.

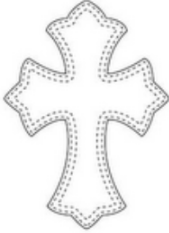
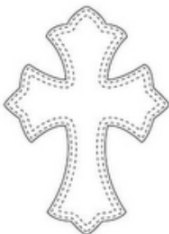
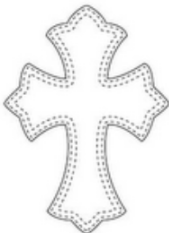
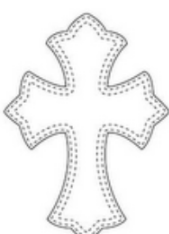
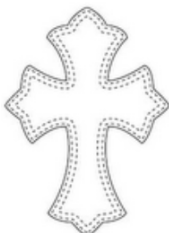
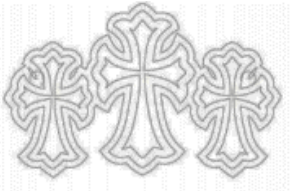
Registration Number	Trademark	Goods and Services
2,350,742		For: eyewear; namely, eyeglasses, sunglasses and their cases in class 009.
3,061,598		For: retail store services in the field of general merchandise in class 035.
4,658,582		For: phone accessories, namely, phone straps, pouches specially adapted for holding phones, phone cases, charms for phones, tablet cases and laptop cases in class 009.
3,657,370		For: bags, namely, handbags, shoulder bags, back packs, tote bags, wallets, garment bags and luggage in class 018.
2,216,575		For: clothing; namely, tee shirts, shirts, tank tops, pants, chaps jeans, sweaters and jackets in class 025.
2,307,126		For: jewelry made wholly or in part of precious metal, namely, rings, earrings, necklaces, bracelets, cuff links, key rings, belt buckles, watches and tie fasteners in class 014.
2,375,507		For: bags; namely, handbags, shoulder bags, back packs, tote bags, wallets and luggage in class 018.




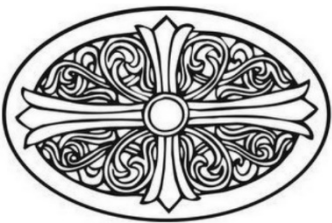
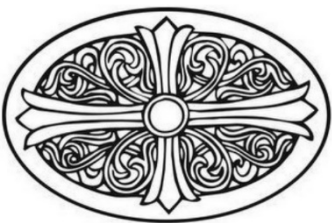
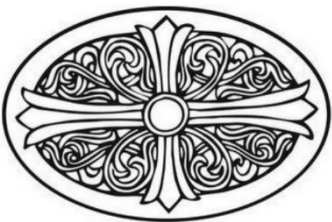
Registration Number	Trademark	Goods and Services
2,408,082		For: men's and women's clothing; namely, jeans, leather pants, skirts, jackets, chaps, sweaters, vests, tee-shirts and shirts in class 025.
2,538,565		For: eyewear; namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
4,504,948		For: jewelry, namely, rings, earrings, necklaces, bracelets, cuff bracelets, pendants, brooches, cuff links, tie fasteners, key rings made of precious metals and watch bracelets in class 014.
4,648,016		For: phone accessories, namely, phone straps, pouches specially adapted for holding phones, phone cases, charms for phones, tablet cases and laptop cases in class 009.
3,657,375		For: bags, namely, handbags, shoulder bags, back packs, tote bags, wallets, garment bags and luggage in class 018.
2,954,539		For: jewelry, namely, bracelets, necklaces, rings, earrings, pendants, cuff links and watch bracelets in class 014.
3,770,379		For: eyewear; namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.

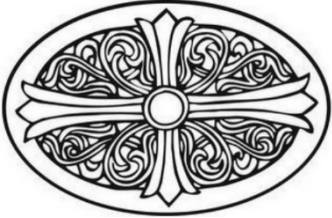





Registration Number	Trademark	Goods and Services
3,877,137		For: clothing; namely, tee shirts, shirts, tank tops, sweaters, sweat shirts, sweat pants, jeans, leather pants, coats, jackets, hats, socks, underwear and footwear in class 025.
3,937,133		For: jewelry; namely, rings, earrings, necklaces, bracelets, pendants, cuff links, dog tags for wear by humans for decorative purposes and watch bracelets in class 014.
3,365,408		For: retail store services in the field of jewelry, clothing, handbags, eyewear, home furnishings, bed linen, and toys in class 035.
3,385,449		For jewelry, namely, bracelets, rings, watch bands, necklaces, and lighters made of precious metals in class 014.
3,388,911		For clothing, namely, tee shirts, shirts, tank tops, sweatshirts, sweat pants, sweaters, and hats in class 025.
3,731,400		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
3,743,975		For: bags, namely, handbags, shoulder bags, back packs, tote bags, wallets and luggage in class 018.
4,809,639		For: paper goods, namely, post cards, stationery, tissue paper, gift boxes and printed matter, namely, magazines featuring information about fashion in class 016.






Registration Number	Trademark	Goods and Services
3,605,854		For: bags, namely, handbags, shoulder bags, clutches, tote bags, wallets, back packs and luggage in class 018.
3,605,860		For: jewelry, namely, rings, earrings, pendants, necklaces, bracelets, cuff bracelets, cuff links, watch bracelets and key rings made of precious metals in class 014.
3,606,059		For: clothing, namely, tee shirts, shirts, tank tops, sweaters, sweat shirts, sweat pants, jeans, pants, jackets, coats and hats in class 025.
3,731,397		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
4,501,775		For: retail store services in the field of general merchandise, namely, clothing, clothing accessories, jewelry, handbags, fragrances, personal leather goods, luggage, toys, and smoking articles in class 035.
4,783,129		For: paper goods, namely, post cards, stationery, tissue paper, gift boxes and printed matter, namely, magazines featuring information about fashion in class 016.
3,267,866		For: clothing, namely, tee shirts, shirts, jackets, tank tops, sweaters, hats and sweatshirts in class 025.



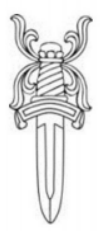



Registration Number	Trademark	Goods and Services
3,731,401		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
4,494,781		For: bags, namely, shoulder bags, handbags, messenger bags, back packs, clutches, evening bags, wallets, duffel bags, luggage in class 018.
4,494,841		For: jewelry, namely, rings, earrings, necklaces, bracelets, cuff bracelets, brooches, pendants, cuff links, key rings made of precious metals, tie fasteners and watch bracelets in class 014.
3,385,415		For: jewelry, namely, bracelets, necklaces, key rings made of precious metals, rings, pendants, watch bracelets in class 014.
3,385,416		For: clothing, namely, tee shirts, shirts, sweaters, tank tops, sweatshirts, hats and pants in class 025.
3,388,912		For: clothing, namely, tee shirts, shirts, sweatshirts, tank tops and hats in class 025.





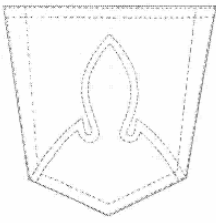
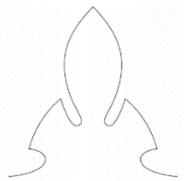
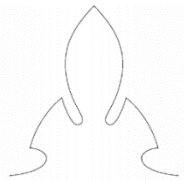
Registration Number	Trademark	Goods and Services
4,616,169		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
4,619,672		For: jewelry, namely, rings, earrings, bracelets, necklaces, pendants, cuff links, cuff bracelets, tie fasteners, key rings made of precious metals, watch bracelets and brooches in class 014.
4,619,673		For: bags, namely, handbags, shoulder bags, back packs, messenger bags, clutches, duffle bags, evening bags, wallets and luggage in class 018.
4,619,674		For: clothing, namely, tee shirts, shirts, tank tops, sweat shirts, sweat pants, vests, sweaters, jeans, pants, chaps, dresses, skirts, jackets, coats, underwear, swimwear, hats, socks and footwear in class 025.
4,619,675		For: Smoking articles, namely, cigarette lighters, cases and holders not of precious metals, tobacco pouches, cigar cutters and humidors in class 034.
3,784,392		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.

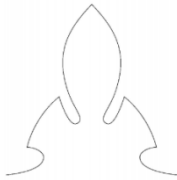
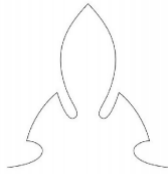




Registration Number	Trademark	Goods and Services
3,728,357		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
4,494,945		For: clothing, namely, tee shirts, shirts, tank tops, sweaters, sweat shirts, vests, dresses, skirts, jackets, coats, jeans, leather pants, chaps, undergarments, swimwear, hats and footwear in class 025.
4,494,946		For: jewelry, namely, rings, earrings, bracelets, necklaces, cuff bracelets, cuff links, brooches, pendants, key rings made of precious metals, tie fasteners and watch bracelets in class 014.
3,731,402		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
4,494,838		For: jewelry, namely, rings, earrings, necklaces, bracelets, cuff bracelets, tie fasteners, brooches, pendants, cuff links, key rings made of precious metals and watch bracelets in class 014.
4,497,576		For: clothing, namely, tee shirts, shirts, tank tops, sweaters, sweat shirts, sweat pants, jeans, leather pants, chaps, skirts, dresses, vests, jackets, coats, swimwear, underwear, hats and footwear in class 025.


Registration Number	Trademark	Goods and Services
5,186,624		For: belt buckles; belt buckles for clothing; zipper pulls; clothing accessories, namely, charms for attachment to zipper pulls and buttons in class 026.
3,388,920		For: clothing, namely, tee shirts, shirts, sweatshirts, jackets and pants in class 025.
3,728,356		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
4,494,782		For: jewelry, namely, rings, earrings, necklaces, bracelets, cuff bracelets, brooches, tie fasteners, cuff links, watch bracelets in class 014.
3,731,403		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
4,510,024		For: clothing, namely, tee shirts, shirts, tank tops, sweaters, sweat shirts, sweat pants, vests, jackets, jeans, leather pants, dresses, skirts, swimwear, undergarments, hats and footwear in class 025.

Registration Number	Trademark	Goods and Services
3,894,026		For: jewelry, namely, rings, earrings, pendants, cuff bracelets, bracelets, necklaces, cuff links, watch bracelets, brooches and dog tags for wear by humans for decorative purposes in class 014.
2,214,641		For: clothing, namely, shirts, tee shirts, pants, jeans, leather jackets, leather vests, leather pants, chaps, coats, gloves, men's and women's underwear, clothing belts and footwear; namely, boots in class 025.
2,214,642		For: bags; namely, shoulder bags, wallets, tote bags, handbags, garment bags and luggage in class 018.
2,284,625		For: jewelry made wholly or in part of precious metals; namely, bracelets, necklaces, rings, pendants, earrings, key rings, brooches, lapel pins, cuff links, watches and belt buckles made wholly or in part of precious metals in class 014.
4,643,894		For: eyewear, namely, eyeglasses and sunglasses; component parts for all of the aforesaid goods; and cases for eyeglasses and sunglasses in class 009.

Registration Number	Trademark	Goods and Services
3,728,359		For: eyewear, namely, eyeglasses, sunglasses, eyeglass cases and sunglass cases in class 009.
4,510,020		For: jewelry, namely, rings, earrings, necklaces, bracelets, cuff bracelets, brooches, cuff links, key rings, watch bracelets and tie fasteners in class 014.
4,510,021		For: clothing, namely, shirts, tee shirts, tank tops, sweaters, vests, sweat shirts, sweat pants, jeans, leather pants, chaps, skirts, jackets, dresses, undergarments, hats, swimwear and footwear in class 025.
4,643,872		For: bags, namely, shoulder bags, wallets, tote bags, handbags, evening bags, clutches, messenger bags, back packs, duffle bags, garment bags for travel and luggage in class 018.
3,385,439		For: clothing, namely, tee shirts, shirts, sweatshirts and hats in class 025.
3,828,365		For: clothing, namely, tee shirts, shirts, tank tops, sweat shirts, sweaters, jackets, lingerie and hats in class 025.

Registration Number	Trademark	Goods and Services
3,831,922		For: bags, namely, hand bags, shoulder bags, messenger bags, back packs, duffle bags, clutches, evening bags, wallets and luggage in class 018.
3,882,533		For: jewelry, namely, rings, earrings, pendants, necklaces, bracelets, dog tags for wear by humans for decorative purposes, and cuff links in class 014.
3,658,047		For: bags, namely, handbags, shoulder bags, back packs, tote bags, wallets and luggage in class 018.
4,510,022		For: bags, namely, handbags, shoulder bags, messenger bags, clutches, evening bags, tote bags, duffel bags, wallets and luggage in class 018.
3,605,968		For: men's and women's clothing, namely, pants, jeans and chaps in class 025.
3,637,806		For: bags, namely, handbags, shoulder bags, back packs, messenger bags, clutches, wallets and luggage in class 018.
3,873,570		For: belt buckles for clothing in class 026.

Registration Number	Trademark	Goods and Services
3,873,571		For: clothing, namely, tee shirts, shirts, tank tops, sweaters, sweat shirts, vests, jackets, coats, pants, jeans and hats in class 025.
4,497,539		For: eyewear, namely, sunglasses, eyeglasses and their cases in class 009.
3,388,913		For: clothing, namely, tee shirts, shirts, tank tops and sweatshirts in class 025.
4,439,515		For: jewelry, namely, rings, earrings, bracelets, necklaces, pendants, cuff links, cuff bracelets, key rings made of precious metals and watch bracelets in class 014.
4,501,509		For: clothing, namely, tee shirts, shirts, tank tops, sweat shirts, vests, sweaters, sweat pants, jeans, leather pants, chaps, skirts, dresses, jackets, coats, swimwear, hats, undergarments and footwear in class 025.
4,494,842		For: jewelry, namely, rings, earrings, necklaces, bracelets, cuff bracelets, brooches, pendants, cuff links, key rings made of precious metals, tie fasteners and watch bracelets in class 014.

Registration Number	Trademark	Goods and Services
4,494,843		For: clothing, namely, shirts, tee shirts, tank tops, sweaters, sweat shirts, sweat pants, dresses, skirts, jackets, coats, jeans, vests, leather pants, chaps, swimwear, underwear, hats and footwear 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 Chrome Hearts’ previously granted Motion for Entry of a Temporary Restraining Order establishes that Chrome Hearts has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Chrome Hearts will suffer irreparable harm if the injunction is not granted. Specifically, Chrome Hearts has proved a *prima facie* case of trademark infringement because (1) the CHROME HEARTS 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 the CHROME HEARTS Trademarks, and (3) Defendants’ use of the CHROME HEARTS Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants’ products with Chrome Hearts. Furthermore, Defendants’ continued and unauthorized use of the CHROME HEARTS Trademarks irreparably harms Chrome Hearts through diminished goodwill and brand confidence, damage to Chrome Hearts’ reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Chrome Hearts 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. 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 the CHROME HEARTS 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 Chrome Hearts product or not authorized by Chrome Hearts to be sold in connection with the CHROME HEARTS Trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Chrome Hearts product or any other product produced by Chrome Hearts, that is not Chrome Hearts' or not produced under the authorization, control or supervision of Chrome Hearts and approved by Chrome Hearts for sale under the CHROME HEARTS Trademarks;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Chrome Hearts, or are sponsored by, approved by, or otherwise connected with Chrome Hearts;
 - d. further infringing the CHROME HEARTS Trademarks and damaging Chrome Hearts' 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 Chrome Hearts, nor authorized by Chrome Hearts to be sold or offered for sale, and which bear any of Chrome Hearts' trademarks, including the CHROME HEARTS 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., Afiliast Limited, CentralNic, Nominet, and the Public Interest Registry, within ten (10) business days of receipt of this Order, shall, at Chrome Hearts' choosing:
 - a. unlock and change the registrar of record for the Domain Names to a registrar of Chrome Hearts' 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 Chrome Hearts' selection so that the Domain Names can be redirected or disabled until further ordered by this Court.
 4. Upon Chrome Hearts' 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 Chrome Hearts 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, the 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”), Amazon Pay, Wish.com, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
5. Upon Chrome Hearts’ 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 CHROME HEARTS 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 Defendants, the Seller Aliases, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto; 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. Chrome Hearts is 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.


Chrome Hearts is 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. Chrome Hearts 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 Chrome Hearts' control will redirect, or by sending an e-mail to the Defendants 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 5 and 6 to the Declaration of Mario Lejtman [14], [15], and the TRO [26] 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 Chrome Hearts shall remain with the Court until a Final disposition of this case or until this Preliminary Injunction is terminated.

Dated: December 1, 2021

Entered:



John Robert Blakey
United States District Judge

**Chrome Hearts LLC v. The Partnerships and Unincorporated Associations Identified on Schedule
"A" - Case No. 21-cv-05778**

Schedule A

Defendant Online Marketplaces		
No	URL	Name / Seller Alias
1	aliexpress.com/store/912225190	xckmoreglow Store
2	asonsteel.en.alibaba.com	Guangdong Ason Jewelry Co., Ltd
3	binchojewelry.en.alibaba	Yiwu Bincho Jewelry Co., Ltd.
4	blodu.en.alibaba	Yiwu Blodu Jewelry Co., Ltd.
5	dglotus.en.alibaba.com	Dongguan Lotus Trading Co., Ltd.
6	haiyunda0308.en.alibaba.com	Guangzhou Haiyunda Jewelry Co., Ltd.
7	jpjewelry.en.alibaba.com	Yiwu J&P Jewelry Co., Ltd.
8	kuphonecase.en.alibaba.com	Guangzhou Jianyuan Electronic Technology Co., Ltd.
9	lywsilverjewelry.en.alibaba.com	Haifeng Meilong Lanyinwang Jewelry Firm
10	omnail.en.alibaba.com	Yiwu Oumei Import And Export Company Limited
11	vriuajewelry.en.alibaba.com	Yiwu Beiya Jewelry Co., Ltd
12	yiqin.en.alibaba.com	Yiwu Fresh Trading Co., Ltd.
13	ywstarlight.en.alibaba.com	Yiwu Shandie Jewelry Factory
14	aliexpress.com/store/1197201	YWG Store
15	aliexpress.com/store/1213545	Caxybb Store
16	aliexpress.com/store/205641	PJ.SDZM Official Store
17	aliexpress.com/store/2306030	Shop2306030 Store
18	aliexpress.com/store/3058014	ROCKART Official Store
19	aliexpress.com/store/311879	Shop311879 Store
20	aliexpress.com/store/4265015	zwinz Store
21	aliexpress.com/store/4917014	wuaiyishi Official Store
22	aliexpress.com/store/5037072	HIYONG Store
23	aliexpress.com/store/5477126	ER-X Nail Store
24	aliexpress.com/store/5484266	DuoCai Store
25	aliexpress.com/store/5557139	Homefwei Store
26	aliexpress.com/store/5570004	Enjoying Life Store
27	aliexpress.com/store/5574085	Dropshipping Apparel Accessories Store
28	aliexpress.com/store/5603216	dreamshow official store
29	aliexpress.com/store/5743149	AnKangLin Store

30	aliexpress.com/store/5784043	MM7 Store
31	aliexpress.com/store/5877615	HeyMamba Official Store
32	aliexpress.com/store/5880545	sdeshy Official Store
33	aliexpress.com/store/5887258	XinYu Wall Decor Store
34	aliexpress.com/store/900234188	Shop900234188 Store
35	aliexpress.com/store/910322246	KMAN Store
36	aliexpress.com/store/910342114	shoescharms Store
37	aliexpress.com/store/910351374	SHOPPINGLOVE Store
38	aliexpress.com/store/910439068	Shop910439068 Store
39	aliexpress.com/store/910633014	Yixinuo Store
40	aliexpress.com/store/910665037	MrZMsZ ZZ Store
41	aliexpress.com/store/910725182	Holycow Inspire Life Store
42	aliexpress.com/store/910824014	Dilate Factory Store
43	aliexpress.com/store/911035013	YIKUF88 s925 Store
44	aliexpress.com/store/911139119	Stars Coverage Store
45	aliexpress.com/store/911187262	etsy Store
46	aliexpress.com/store/911189081	Italy Store
47	aliexpress.com/store/911198224	Shop911198224 Store
48	aliexpress.com/store/911226021	Shop911226021 Store
49	aliexpress.com/store/911237124	QI1108 Store
50	aliexpress.com/store/911253096	Cybers Store
51	aliexpress.com/store/911261087	MAFI JEWELRY Store
52	aliexpress.com/store/911267007	Shop911267007 Store
53	aliexpress.com/store/911413449	Adios keychain Store
54	aliexpress.com/store/911514124	Shop911514124 Store
55	aliexpress.com/store/911542066	Bincho Store
56	aliexpress.com/store/911564395	AsJerlyajewelry Store
57	aliexpress.com/store/911603043	YONDERSON Store
58	aliexpress.com/store/911604551	Guoxiu Store
59	aliexpress.com/store/911605879	Season Gate Silver Jews Store
60	aliexpress.com/store/911609553	zengcheng-3 Store
61	aliexpress.com/store/911638022	MIASOL Jewelry Store
62	aliexpress.com/store/911655281	Shunxin Store
63	aliexpress.com/store/911664238	Utopiaed house Store
64	aliexpress.com/store/911700082	Yyin Store
65	aliexpress.com/store/911718108	Easybuy gogogo Store
66	aliexpress.com/store/911737091	JJlucky Store
67	aliexpress.com/store/911745098	Redman Accessories Club Store
68	aliexpress.com/store/911748499	Seoul wardrobe Store
69	aliexpress.com/store/911753091	About Us Store
70	aliexpress.com/store/911760049	hezurong111222 Store
71	aliexpress.com/store/911777291	High-Quality-Brand- Store

72	aliexpress.com/store/911792592	Vincent's KeyCase Store
73	aliexpress.com/store/911794106	JJGao Store
74	aliexpress.com/store/911816290	Streetwear 01 Store
75	aliexpress.com/store/911840097	YYO Nail Store
76	aliexpress.com/store/911840272	Speedest Performance Store
77	aliexpress.com/store/911843307	Tiantianmimi Store
78	aliexpress.com/store/911855025	ECHO-7S Store
79	aliexpress.com/store/911892191	Street art 23 Store
80	aliexpress.com/store/911898163	LanTian Embroidered Patch Store
81	aliexpress.com/store/911938339	WJYYZQZJ Store
82	aliexpress.com/store/911943253	DDL Store
83	aliexpress.com/store/911956159	EmmaWatson Store
84	aliexpress.com/store/911967197	Zaey-Fashion Store Store
85	aliexpress.com/store/912024340	Cheering Store
86	aliexpress.com/store/912061594	ksup Store
87	aliexpress.com/store/912146049	DILIAN Store
88	aliexpress.com/store/912152298	bore Store
89	aliexpress.com/store/912242062	Lintian silver shop Store
90	aliexpress.com/store/917104	Jimmax Eyewear Store
91	aliexpress.com/store/911142050	Shop911142050 Store
92	aliexpress.com/store/911858025	Sold Out Store
93	amazon.com/sp?seller=A12H3NPOFL56P6	KUSERON
94	amazon.com/sp?seller=A172R4UKAWT03O	chuchuntong-US
95	amazon.com/sp?seller=A18Y3NKN7YAVE5	junsheng US
96	amazon.com/sp?seller=A1DG6RJ7POYD28	Collody
97	amazon.com/sp?seller=A1IVYP7JXK44YS	Guangzhouchongzhangmaoyiyou xiangongsi
98	amazon.com/sp?seller=A1JSJ8R9WGY51A	Homyu
99	amazon.com/sp?seller=A1KOY6IMRM1GHY	jinjiangqujianxinyuanjiancaijingyi ngbu
100	amazon.com/sp?seller=A1X06TBJHVE1PT	chenerer
101	amazon.com/sp?seller=A21AKDFTNDAMIX	shenzhenshiyuchengmaoyiyouxia ngongsi
102	amazon.com/sp?seller=A25ANCIQ33PE4C	A25ANCIQ33PE4C
103	amazon.com/sp?seller=A26YOX5U212CGO	Huiusga025
104	amazon.com/sp?seller=A2ANDBBSCY7QBS	WZMDZMD
105	amazon.com/sp?seller=A2CGSVL87566I7	G489HBTR489HTRH465GRE516E RF984WE
106	amazon.com/sp?seller=A2E1OCJ8TLNRU5	B418Y94KMYU65JM1T651H986T RE
107	amazon.com/sp?seller=A2J9MS0D5PAURV	EverSnows-Usa
108	amazon.com/sp?seller=A2PDDUTN4YBDJH	TUOGU

109	amazon.com/sp?seller=A354N60B1NK5JV	nanpingshijianyangqubaochaohe baihuodian
110	amazon.com/sp?seller=A3500YZVSBFWV2	Cool-MC
111	amazon.com/sp?seller=A3DORVR19RHHP2	HUIGOUDIAN
112	amazon.com/sp?seller=A3IRGOYCI6154U	lk32n52lk4n
113	amazon.com/sp?seller=A7N1G3HPL01NF	HaveWangHome
114	amazon.com/sp?seller=A86ESCSQR4QCC	Aaongshanxiandieanbaihuodian
115	amazon.com/sp?seller=AGLPYPM3GX96Q	GNM189UYK498YU4J65TY3
116	amazon.com/sp?seller=ATCU5BO9RM0RZ	LSEAJAO
117	amazon.com/sp?seller=AW9VXRE5UHB9Y	changjiangqushenwubaihuodian
118	amazon.com/sp?seller=AZ5LJ0ZXAP83F	MengShengShengWuKeji
119	dhgate.com/store/20187802	chencaiqiong Store
120	dhgate.com/store/20642881	sport0038
121	dhgate.com/store/20642881	sport0038 Store
122	dhgate.com/store/20696210	lanvineyjewelry
123	dhgate.com/store/20696210	lanvineyjewelry Store
124	dhgate.com/store/21147601	wyzqbf
125	dhgate.com/store/21187118	ming0102 Store
126	dhgate.com/store/21211101	air_jordan8
127	dhgate.com/store/21572817	alllovejewelry Store
128	dhgate.com/store/21602952	buyendhgate
129	dhgate.com/store/21606924	luckysdhgate
130	dhgate.com/store/21609143	Stevengohomes,Inc
131	dhgate.com/store/21640764	zym56000
132	dhgate.com/store/21642004	bikinistores
133	dhgate.com/store/21643679	beauty_castle Store
134	dhgate.com/store/21643834	funstudio Store
135	dhgate.com/store/21644955	ruyiwqq
136	dhgate.com/store/21648593	Hometimebuyings INC
137	dhgate.com/store/21651600	xidiandhgate Store
138	dhgate.com/store/21662412	lululemens Store
139	dhgate.com/store/21666906	kaixuan8 Store
140	dhgate.com/store/21667814	he4dhgaten
141	dhgate.com/store/21675877	beltdhgateee
142	dhgate.com/store/21676227	brand1333
143	dhgate.com/store/21681921	kkdhgateess Store
144	dhgate.com/store/21681924	jjdhgatett Store
145	dhgate.com/store/21700625	mmmi123 Store
146	dhgate.com/wholesale/products/ff808081602194d3016 0e04242b20f88.html	lujoyce
147	ebay.com/usr/hongxiang8998	hongxiang8998
148	ebay.com/usr/zoesky-jewelry	zoesky-jewelry

149	wish.com/merchant/5ffbd58e94876e5daf64031a	HuDieee
150	wish.com/merchant/60543a17a7fe500941d1f546	CKSYAW520ccf

Defendant Domain Names		
No	URL	Name / Seller Alias
1	penthousetheory.com	penthousetheory.com