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

EMOJI COMPANY GmbH.

Plaintiff.

v.

THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A HERETO,

Defendants.

Case No. 21-cv-6375

Judge Matthew F. Kennelly

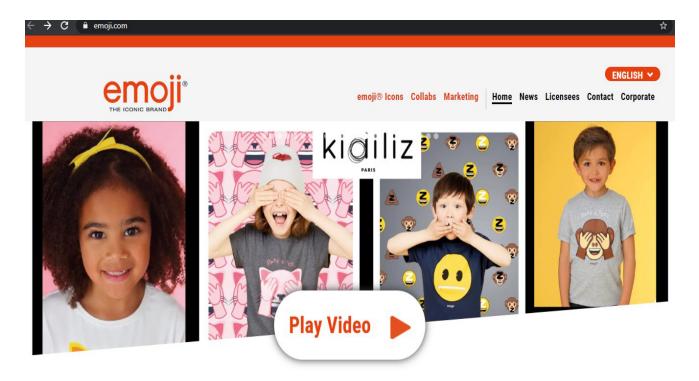
SEALED EX PARTE TEMPORARY RESTRAINING ORDER

THIS CAUSE being before the Court on Plaintiff's *Ex Parte* Motion for Entry of a Temporary Restraining Order, Including a Temporary Injunction, a Temporary Transfer of the Defendant Domain Names, a Temporary Asset Restraint, Expedited Discovery, and Service of Process by Email and/or Electronic Publication (the "Ex Parte Motion") against the defendants identified in Schedule A to the Complaint and attached hereto (collectively, the "Defendants") and using at least the domain names identified in Schedule A (the "Defendant Domain Names") and the online marketplace accounts identified in Schedule A (the "Online Marketplace Accounts"), and this Court having heard the evidence before it hereby GRANTS Plaintiff's *Ex Parte* Motion in its entirety.

This Court further 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, offering to sell and ship products into this Judicial District. Specifically,

Defendants are reaching out to do business with Illinois residents by operating one or more commercial, interactive Internet Stores through which Illinois residents can purchase products bearing counterfeit versions of U.S. Trademark Registration Nos. 4,868,832; 5,202,078 and 5,415,510 (referenced below).

https://www.emoji.com/



This Court also finds that issuing this Order without notice pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure is appropriate because Plaintiff has presented specific facts in the Declarations of José Santiago, Anna K. Reiter and Michael A. Hierl and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. Specifically, in the absence of an *Ex Parte* Order, Defendants could and likely would modify registration data and content, change hosts, redirect traffic to other websites in their control, and move any assets from accounts in

U.S.-based financial institutions, including PayPal and Amazon accounts, to offshore accounts. As other courts have recognized, proceedings against those who deliberately traffic in counterfeit merchandise are often useless if notice is given to the adverse party. Accordingly, this Court orders that:

- 1. Defendants, their officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under or in active concert with them be temporarily enjoined and restrained from:
 - a. using Plaintiff's EMOJI Trademarks or any confusingly similar trademark or name in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any products that are not genuine EMOJI products or are not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any products as genuine EMOJI products or any other products produced by Plaintiff, that are not Plaintiff's or are not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's EMOJI Trademarks;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
 - d. further infringing Plaintiff's EMOJI Trademarks and damaging Plaintiff's goodwill;

- e. 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 Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear Plaintiff's EMOJI Trademarks or any reproductions, counterfeit copies or colorable imitations thereof;
- f. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names, or any other domain name or online marketplace account that is being used to sell or is the means by which Defendants could continue to sell Counterfeit EMOJI products; and
- g. operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing Plaintiff's EMOJI Trademarks and any reproductions, counterfeit copies or colorable imitations thereof that are not genuine EMOJI products or are not authorized by Plaintiff to be sold in connection with Plaintiff's EMOJI Trademarks.
- 2. Each Defendant, within ten (10) days after receiving notice of this Order, shall serve upon Plaintiff a written report under oath providing: (a) their true name and physical address, (b) all websites and online marketplace accounts on any platform that they own and/or operate (c) their financial accounts, including all PayPal and Amazon accounts, and (d) the steps taken by each Defendant to comply with paragraph 1, a through g, above.

- 3. The domain name registries for the Defendant Domain Names, including, but not Limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, within five (5) business days of receipt of this Order or prior to expiration of this Order, whichever date shall occur first, shall, at Plaintiff's choosing:
 - a. unlock and change the registrar of record for the Defendant Domain Names to a registrar of Plaintiff's selection until further ordered by this Court, and the domain name registrars shall take any steps necessary to transfer the Defendant Domain Names to a registrar of Plaintiff's selection until further ordered by this Court; or
 - b. disable the Defendant Domain Names and make them inactive and untransferable until further ordered by this Court.
- 4. Those in privity with Defendants and with actual notice of this Order, including any online marketplaces such as iOffer, PayPal and Amazon and any related entities, social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing and Yahoo, web hosts for the Defendant Domain Names, and domain name registrars, shall within five (5) business days of receipt of this Order:
 - a. disable and cease providing services for any accounts through which
 Defendants engage in the sale of counterfeit and infringing goods using the
 EMOJI Trademarks, including any accounts associated with the Defendants
 listed in Schedule A;
 - b. disable and cease displaying any advertisements used by or associated with
 Defendants in connection with the sale of counterfeit and infringing goods
 using the EMOJI Trademarks; and

- c. take all steps necessary to prevent links to the Defendant Domain Names identified in Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Domain Names from any search index.
- 5. Defendants and any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of Defendants' websites at the Defendant Domain Names or other websites operated by Defendants, including, without limitation, any online marketplace platforms such as iOffer, PayPal and Amazon, advertisers, Facebook, Internet Service Providers ("ISP"), web hosts, back-end service providers, web designers, sponsored search engine or ad-word providers, banks, merchant account providers, including PayPal and Amazon, third party processors and other payment processing service providers, shippers, and domain name registrars (collectively, the "Third Party Providers") shall, within five (5) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:
 - a. The identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information;
 - b. The nature of Defendants' operations and all associated sales and financial information, including, without limitation, identifying information associated with the Online Marketplace Accounts, the Defendant Domain Names, and Defendants' financial accounts, as well as providing a full accounting of

- Defendants' sales and listing history related to their respective Online Marketplace Accounts and Defendant Domain Names;
- c. Defendants' websites and/or any Online Marketplace Accounts;
- d. The Defendant Domain Names or any domain name registered by Defendants;
- e. Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal and Amazon or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
- 6. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 7. PayPal shall, within five (5) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:
 - a. Locate all accounts and funds connected to and related to Defendants,

 Defendants' Online Marketplace Accounts or Defendants' websites, including,
 but not limited to, any PayPal accounts connected to and related to the
 information listed in Schedule A hereto and the email addresses identified in
 Exhibit 2 to the Declaration of Jose Santiago; and

- 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. Amazon shall, within five (5) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:
 - a. Locate all accounts and funds connected to and related to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any Amazon accounts connected to and related to the information listed in Schedule A hereto and the email addresses identified in Exhibit 2 to the Declaration of Jose Santiago; and
 - 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.
- 9. Any banks, savings and loan associations, payment processors, or other financial institutions, for any Defendant or any of Defendants' Online Marketplace Accounts or websites, shall within five (5) business days of receipt of this Order:
 - a. Locate all accounts and funds connected to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any accounts connected to the information listed in Schedule A to the Complaint; and
 - b. Restrain and enjoin such accounts from receiving, transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

- 10. Plaintiff may provide notice of these proceedings to Defendants, including notice of the preliminary injunction hearing and service of process pursuant to Fed.R.Civ.P. 4(f)(3), by electronically publishing a link to the Complaint, this Order and other relevant documents on a website to which the Defendant Domain Names which are transferred to Plaintiff's control will redirect, or by sending an e-mail to the e-mail addresses identified in Schedule A to the Complaint and any e-mail addresses provided for Defendants by third parties that includes a link to said website. The Clerk of Court is directed to issue a single original summons in the name of "Dongguan Songshan Trading Company Ltd. 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.
- 11. Plaintiff's Complaint, Schedule A to the Complaint, and this Order shall remain sealed until Defendants' financial accounts are restrained. Plaintiff shall file unsealed versions of the Complaint, Schedule A to the Complaint, and this Order using the CM/ECF system prior to the expiration of this Order. Plaintiff shall deposit with the Court Ten Thousand Dollars (\$10,000.00), either cash, cashier's check or surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of a wrongful restraint hereunder.
- 12. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two days' notice to Plaintiff or on shorter notice as set by this Court.

This Temporary Restraining Order without notice is entered on December 2, 2021 at 2:00 P.M., and shall remain in effect for fourteen (14) days.

U.S. District Court Judge

SCHEDULE A

No.	Defendant Name / Alias
1	Dongguan Songshan Trading Company Ltd.
2	alpha-mart00
3	apollo_store_11
4	autopartsvalue20
5	baox_50
6	blueceylon_market
7	caregue04
8	desire_center
9	dnbrrlq496_8
10	isudes38
11	jewelryangellove
12	kasuni_63
13	kingjinbao
14	milindgimhan0
15	p.g.s.bawantha
16	paradise_island1
17	premium_gadget
18	qfhm8978
19	yasarekan0
20	Ability Storm
21	adurello
22	agilitynoun
23	AGUIBAIHUO
24	AIR8
25	Akally
26	ALGBGVJGJT
27	ALINUO
28	anshenfuwff
29	ANthonyw
30	aoXinHeN
31	APPointed
32	aProperty
33	Arnold Glenn
34	AT Gifts
35	BABYBEIBEI
36	BaByPinkyS
37	BAKAM Direct
38	Banghui Electronics

39	bao yu sen lin sheng tai kai fa
40	BaoAnQuWuHanHuiLengYinDian
41	BaronHanJH
42	Beanfans
43	Beautiful Cloud
44	Beautiful Dandelion
45	beepe
46	beilundaqi
47	Bellahouse
48	Bernie Gresham
49	Best moment
50	best sunnysky
51	BinTenger
52	Blanketfun
53	Blue shell photography
54	Bluexury Flagship
55	BN21HK21.
56	BOKASM
57	Bomden
58	Boong Store
59	BOWERSK
60	bqxwv
61	BraitonUS-store
62	Brostown Technology
63	bsahnh
64	bulaiDDTD
65	bwireorr
66	Callmebrother
67	Camillee
68	CarLining
69	cation
70	chaochijianshegongcheng
71	ChaoDaiJin
72	CHAOLI
73	ChengDouFengLiTingDianZiShangWuYouXianGongSi
74	chengdujinzehuanyangshangmaoyouxiangongsi
75	chengxiangqulongqiaofumingyanfuzhuangdian
76	chenjiahaobld
77	Chenyangg
78	CheryltLJZ
79	СНМҮК

80	chuanyenongziy
81	chuanzidianzi
82	CJXNB
83	CNNTREWS
84	COCOKUBU
85	Colorboy Store
86	congcongfafa
87	Contend
88	Coolcarlights
89	Corriendo Gato
90	CozyRoomz
91	cqkj
92	Crazy dance
93	CSOTE-5-15 Days Standard Shipping
94	CursonMaty
95	CyberMoon
96	CYEfuzhuang
97	daimengmeng
98	Darknesss
99	DavidWilliam
100	DeliaWinterfel-Global
101	DERCLIVE Diret
102	DFHUJTD
103	dhryxbs
104	DingFS
105	District Army Fei shangmao
106	Diversity Online
107	dongguanshisenguan
108	dongjiguang01
109	DONGLWI
110	Dongxin building materials
111	Dongyang Huapai Clothing Co., Ltd
112	Elangman
113	Emily Simon
114	enshishicunshixishangmaoyouxiangongsi
115	ERTG♥
116	ETERLY
117	Ewarm
118	eytef
119	F.O.T
120	Facai20

121	fadeless
122	Fairyforest
123	Famous All Blue
124	fancebaihuodian
125	fangyingshangmao888
126	fanweimeiguo
127	FAROOTUS
128	Fary Sotem
129	fdhdshfdbfdgdsg
130	fenghuangshanzhengmeizibaihuolingshouchaoshi
131	Fengqi Zhou
132	Fengranjie Internatio
133	FFYC1118
134	Flower Online
135	FourPING
136	FUANGSHI
137	Game-JAY
138	GAOM
139	gguhujhi
140	gjuJinJiaoDianMenSh
141	Gkhem
142	Goddessstore
143	Good/Trading
144	Gourydones
145	greatgg
146	GreatTry
147	GSFMMG
148	guangdongxuhaixinxijish uyouxiangongsi
149	GuangZhouBaiLiMaoYiYouXianGongSisda
150	guangzhouhanbeisimaoyiyouxiangongsi
151	GZCDHWLKJ
152	haijiashanghang
153	HAILAN
154	HanDarrenson
155	HANNENBAIHUODIAN
156	hanxinmaoyizhongxin
157	HANZHIWEI
158	Haodeyi
159	HaoYDP
160	Haozhenzhen Network Technology Co., Ltd.
161	Happy Hours

162	HeBiShiShanChengQuTaoSiTuShuDian
163	HECHUANGWANBANG®
164	hefeinuexushangmaoyouxiangongsi US
165	Henaa
166	Henangubaoxincailiaokejiyouxiangongsi
167	HH88XIAO66A
168	HH-Love-Kids
169	hjgsyu
170	hjmaoyi
171	HOMUT
172	Hong CAi shope
173	hongdabaihuodian
174	hongdongxianjiangjiangwujindianliaobu
175	HONMWYTQ
176	houLuGangHuoYunYouX
177	huachengsn
178	huangshishimeiwenshangmaoyouxiangongsi
179	Hubei Xinrui Children's Products Co., Ltd.
180	huikedianzishangwuzhongxin
181	huilaixinbaiguodian
182	HuiZhouShiHuiChengQuTaiLiNiuRouHuoGuoDian
183	hunand
184	hvbuibuiohnoi
185	Image Canvas
186	Into Forlen
187	Iumi
188	Jakarta J
189	JDyouuu
190	Jerry chen
191	Jiang Bai Company
192	JiangSuErChaoShangMaoYouXianGongSi
193	JiaoZhouShiHuaiYiHengNongChanPinShangDian
194	jichangxingjing
195	JIDANSHOP
196	Jimiong
197	Jing Jing You Pin
198	Jingjiang Yifeng Trading Co., Ltd.
199	JJLZS

No.	Defendants Online Marketplace
1	https://sseesy.en.alibaba.com
2	https://www.ebay.com/usr/alpha-mart00
3	https://www.ebay.com/usr/apollo store 11
4	https://www.ebay.com/usr/autopartsvalue20
5	https://www.ebay.com/usr/baox 50
6	https://www.ebay.com/usr/blueceylon market
7	https://www.ebay.co.uk/usr/caregue04
8	https://www.ebay.com/usr/desire_center
9	https://www.ebay.com/usr/dnbrrlq496 8
10	https://www.ebay.com/usr/isudes38
11	https://www.ebay.com/usr/jewelryangellove
12	https://www.ebay.com/usr/kasuni 63
13	https://www.ebay.com/usr/kingjinbao
14	https://www.ebay.com/usr/milindgimhan0
15	https://www.ebay.com/usr/p.g.s.bawantha
16	https://www.ebay.com/usr/paradise_island1
17	https://www.ebay.com/usr/premium_gadget
18	https://www.ebay.com/usr/qfhm8978
19	https://www.ebay.com/usr/yasarekan0
20	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA=
	&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=AWO1P3
	NJLHJQ&sshmPath=
21	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=1&isCBA=
	&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A1QTNG HHI5D8OX&sshmPath=
22	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA=
	&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A2S3CBT
	8B36S1Y&sshmPath=
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	&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=AVI3XN
	MML8QS&sshmPath=
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	4UU4KAB&sshmPath=
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	&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=AL1GBG
	1V5JGJT&sshmPath=
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	Y079PU8&sshmPath=

28	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A3OT3R K3VGQV3V&sshmPath=
29	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A3W5675 7VYLZN9&sshmPath=
30	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A1R23ZQ KJVRFAQ&sshmPath=
31	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A26E8BR MTKHCO&sshmPath=
32	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A2AQCK CKFEEIPR&sshmPath=
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34	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=1&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A2XZG4E ZQD4K5H&sshmPath=
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37	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=1&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=ANGC6A X8TX6H6&sshmPath=
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39	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A3QLKEJ H3L2JOB&sshmPath=
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	&marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A3SXAT6 M9N39MT&sshmPath=
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46	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A1WXO0 9IRXAFRW&sshmPath=
47	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A294Z2Q 4YR63C3&sshmPath=
48	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=A2JSF69 GE5N7AR&sshmPath=
49	https://www.amazon.com/sp?_encoding=UTF8&asin=&isAmazonFulfilled=1&isCBA= &marketplaceID=ATVPDKIKX0DER&orderID=&protocol=current&seller=AO3S2U3 QY4KDR&sshmPath=
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