

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

DYSON TECHNOLOGY LIMITED,

Plaintiff,

v.

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

Defendants.

Case No. 22-cv-00801

Judge Mary M. Rowland

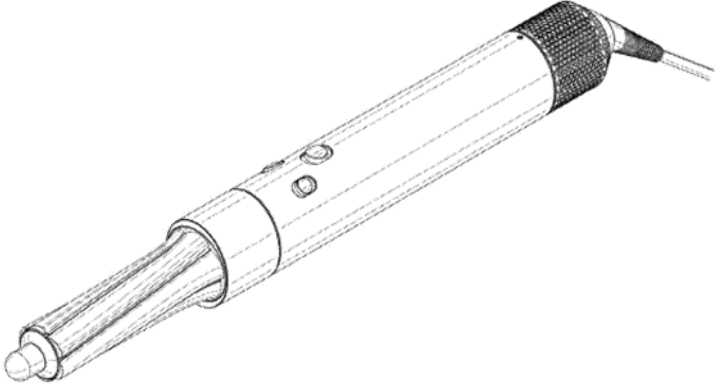
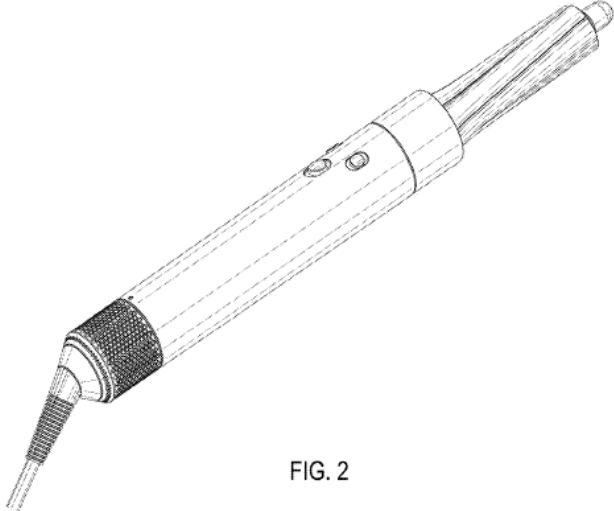



Magistrate Judge Beth W. Jantz

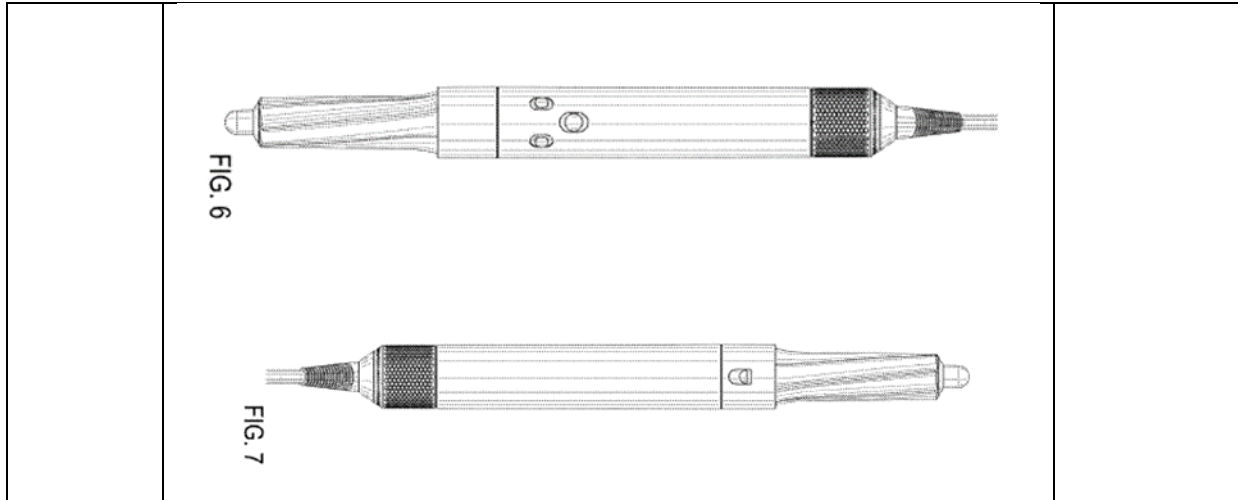
PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff Dyson Technology Limited (“Dyson” or “Plaintiff”) Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS Plaintiff’s Motion for Entry of a Preliminary Injunction in its entirety against the 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. 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 the same product that infringes directly and/or indirectly Plaintiff’s United States design patent in the below chart (the “Dyson Design”).

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

Patent Number	Claim	Issue Date
D853,642	<div><p>FIG. 1</p><p>FIG. 2</p><p>FIG. 3</p><p>FIG. 4</p><p>FIG. 5</p></div>	July 9, 2019



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 Dyson’s previously granted Motion for Entry of a Temporary Restraining Order establishes that Dyson has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Dyson will suffer irreparable harm if the injunction is not granted. Specifically, Dyson has proved a *prima facie* case of design infringement because (1) Dyson is the lawful assignee of all right, title and interest in and to the Dyson Design, (2) Defendants make, use, offer for sale, sell, and/or import into the United States for subsequent sale or use products that infringe directly and/or indirectly the ornamental design claimed in the Dyson Design, and (3) an ordinary observer would be deceived into thinking the Infringing Product was the same as the Dyson Design. Furthermore, Defendants’ continued and unauthorized use of the Dyson Design irreparably harms Dyson through loss of customers’ goodwill, reputational harm, and Dyson’s ability to exploit the Dyson Design. Monetary damages fail to address such damage and, therefore, Dyson 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 officers, agents, servants, employees, attorneys, and other persons acting in active concert or participation with them be preliminarily enjoined and restrained from:
 - a. offering for sale, selling and importing any products not authorized by Dyson and that include any reproduction, copy or colorable imitation of the design claimed in the Dyson Design;
 - b. aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon the Dyson Design; and
 - c. effecting assignments or transfers, forming new entities or associations or utilizing any other device for the purpose of circumventing or otherwise avoiding the prohibitions set forth in Subparagraphs (a) and (b).
2. Upon Dyson's 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 Defendants' Online Marketplaces, 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 Dyson 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, 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 and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces; and
 - c. any financial accounts owned or controlled by Defendants, including their agents, servants, employees, 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"), eBay, 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).
3. Upon Dyson's request, those with notice of the injunction, including Third Party Providers as defined in Paragraph 2, 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 infringing goods using the Dyson Design.
4. Defendants shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

5. Any Third Party Providers, including PayPal, eBay, 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' 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.
6. Dyson 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, 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 and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces.

Dyson 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.

7. Dyson 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 and by sending

an e-mail to 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 and e-mail, along with any notice that Defendants receive from 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.

8. Schedule A to the Complaint [2], Exhibit 1 to the Complaint [3], Exhibit 2 to the Declaration of Giles Samuel Lane [18], and the Temporary Restraining Order [23] are unsealed.
9. 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.
10. The \$10,000 bond posted by Dyson 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 4, 2022



Mary M. Rowland
United States District Judge

**Dyson Technology Limited v. The Partnerships and Unincorporated Associations Identified on
Schedule "A" - Case No. 22-cv-00801**

Schedule A

Defendant Online Marketplaces		
No	URL	Name / Seller Alias
1	amazon.com/sp?seller=A108T451RDY9SC	Super Jewelry Clothes Shoe Shop
2	amazon.com/sp?seller=A14GVTRQ4D3YCB	LBVGY
3	amazon.com/sp?seller=A161FPB26UGU4X	LvLiangShiLiShiQuQuLongWuJinRiZ aDian
4	amazon.com/sp?seller=A16QPUGSK7F12R	lxlstor
5	amazon.com/sp?seller=A16UU2B36FVYAN	DIZAT
6	amazon.com/sp?seller=A18LV3HVVH36J33	G 7 mall
7	amazon.com/sp?seller=A19CBLWOBETCAV	jingpinhui
8	amazon.com/sp?seller=A1A1A9ER5DNTW	qjlzxm
9	amazon.com/sp?seller=A1AAPYJRNBT9J	Oucity Store
10	amazon.com/sp?seller=A1AND2WDAM9UJL	Laughing Peach
11	amazon.com/sp?seller=A1ANKLNC6GXOH7	hsgjxfngntn
12	amazon.com/sp?seller=A1BHB22F39IEKK	YYCDD
13	amazon.com/sp?seller=A1CKAA5DLKZ5MQ	henanhuanruodianzikejiyouxiango ngsi
14	amazon.com/sp?seller=A1G020FIX1HAHQ	hui zhan store
15	amazon.com/sp?seller=A1HZEK7PP1LO3J	QiaoFan
16	amazon.com/sp?seller=A1I5BDS1STQBO	QiXiNiaoZhiYeZhuang
17	amazon.com/sp?seller=A1N1X07N8OE4LC	MXQ.LOC
18	amazon.com/sp?seller=A1O3Q68I9XOSL9	Mufasa-US
19	amazon.com/sp?seller=A1Q5JF97TJM1GG	LvLiangShiLiShiQuYiChengDianZiSh angWuGongZuoShi
20	amazon.com/sp?seller=A1Q6AIS9NCO01K	ayyshkn
21	amazon.com/sp?seller=A1R4COPE9X6MIP	BAOFU LLC
22	amazon.com/sp?seller=A1RWA8PRYOIYIB	You Best home
23	amazon.com/sp?seller=A1SD2PD6QHS3XJ	Yanlinglingbaihuo
24	amazon.com/sp?seller=A1V5SKGL3M6POM	carmel aistry
25	amazon.com/sp?seller=A1WLYTVM01QVAI	SHIJATONG-US
26	amazon.com/sp?seller=A1WQ3NIMMP99CP	CCHAIY
27	amazon.com/sp?seller=A1Z7CZLQF609MH	hgfdshjfgfjhfgds
28	amazon.com/sp?seller=A1ZBCERII7Z0CW	yangchunling's shop
29	amazon.com/sp?seller=A22QTUBKMS6B9F	ApedIn
30	amazon.com/sp?seller=A24V8XBEJ02C7G	Themis store
31	amazon.com/sp?seller=A255TXVMPFLPSW	JIANLshop
32	amazon.com/sp?seller=A2648RVZR6NRO6	yemu0012
33	amazon.com/sp?seller=A26HRIZHGY6ALR	tonglaobangongyilipindian

34	amazon.com/sp?seller=A26W0DOLD8L0MD	TJOIUY
35	amazon.com/sp?seller=A2841YBCZDW6CT	Stallone03
36	amazon.com/sp?seller=A2A5AOC9BXSKEK	The only truth
37	amazon.com/sp?seller=A2CKWMSUFSSCVA	JYKJUS
38	amazon.com/sp?seller=A2CO4DC12J252N	WJY-US
39	amazon.com/sp?seller=A2CPVWF8F6V575	SWT Ltd
40	amazon.com/sp?seller=A2F07CK9WXIKDL	JiaLi Ltd8 to 15 days delivery
41	amazon.com/sp?seller=A2F95ATINQHH11	ZHENGMS
42	amazon.com/sp?seller=A2FFHMKBL14HBO	jgdkliueqw
43	amazon.com/sp?seller=A2G0Q6WB4TZ40S	zhangyingdianzi
44	amazon.com/sp?seller=A2G2O95WP9O1ZH	YuLaiQing
45	amazon.com/sp?seller=A2HQE99XKARYQ4	LS.yyziq
46	amazon.com/sp?seller=A2ICSUZZHK8XFS	Good Impression Store
47	amazon.com/sp?seller=A2J6BIIRLJQ8VM	ghjdfgdhgd
48	amazon.com/sp?seller=A2JGZDPIHVFDVO	wangzhaoyang-001
49	amazon.com/sp?seller=A2LNQMPO4WK93H	YTEVYT
50	amazon.com/sp?seller=A2N5XBKQVOLEPW	LiuLinXianHongBingWuJinXiaoShiP inDian
51	amazon.com/sp?seller=A2Q4NSV1GVXFQF	ZTIMI
52	amazon.com/sp?seller=A2QX82A432J2P0	lileyi
53	amazon.com/sp?seller=A2RSB1GPLIDM1	Lvliangshilishiquwunianbaihuosha nghan
54	amazon.com/sp?seller=A2SGV4CA1BTIBS	ZGINTEGRITY
55	amazon.com/sp?seller=A2V5LL9MWCU595	ChuangYingZhiFu
56	amazon.com/sp?seller=A2VE8P1EAIK6KK	tianfengshop
57	amazon.com/sp?seller=A2WRTQH84IDT1R	ZNUSP
58	amazon.com/sp?seller=A2Y7O813ACTTS7	dyuygj
59	amazon.com/sp?seller=A2ZB34WDEXP2VW	xin silu-us
60	amazon.com/sp?seller=A2ZQXDVE05HMSG	YinDirect
61	amazon.com/sp?seller=A315RO91KXPBA9	HUYISMH
62	amazon.com/sp?seller=A31ANXGVETZ1C8	yangshuying's shop
63	amazon.com/sp?seller=A31KFP003E0NTA	wughgghg
64	amazon.com/sp?seller=A324JU8Y3DW6IB	quezhengping's shop
65	amazon.com/sp?seller=A324ZIS092FS0A	Deliv0506
66	amazon.com/sp?seller=A32P55T64SB9SK	xinyuheng
67	amazon.com/sp?seller=A35SU8Z2OE0GPC	QianPiaoDuo
68	amazon.com/sp?seller=A3A2G1C3ID0Q65	SUMLINK
69	amazon.com/sp?seller=A3AN5YSF8XXQFV	wudinglongyifuzhuangshangdian
70	amazon.com/sp?seller=A3AZYTUKXREFXL	qingdaoqingledianzishangwuyouxi angongsi
71	amazon.com/sp?seller=A3B97O998Z523Z	XiLinGuoLeiMengXiBeiShengWuKe JiKaiFaYouXianGongSi5

72	amazon.com/sp?seller=A3BLS3BZGL7PCT	LIZHAOYANG
73	amazon.com/sp?seller=A3C7WIDBEWUXHK	GeoPanWrap
74	amazon.com/sp?seller=A3EXQ9LFYSO66G	AMZJIANFEI
75	amazon.com/sp?seller=A3HYTO6ZFIW7EH	yunnanchuanghe
76	amazon.com/sp?seller=A3J4MC0A82LHOQ	XWUFUAS
77	amazon.com/sp?seller=A3JDEODZ49V1XS	FCFC-US
78	amazon.com/sp?seller=A3K7UQZ36S3U3M	XiaoRongcit
79	amazon.com/sp?seller=A3KSEYEWXIPMIK	wangwei1101
80	amazon.com/sp?seller=A3LJP7KQJCTFH8	zhangtianyiqu
81	amazon.com/sp?seller=A3NE6PJYV2DHK1	WWW.AMZCN
82	amazon.com/sp?seller=A3NVGZZLR5PCH8	daxuchang
83	amazon.com/sp?seller=A3ODFQ7B0JSU9D	ZhiHong Store
84	amazon.com/sp?seller=A3P2RJRWKEYGAF	lenkeng
85	amazon.com/sp?seller=A3Q94WIVXPRWVB	MAGWEN
86	amazon.com/sp?seller=A3R19MDCRQSKFK	xihemayi
87	amazon.com/sp?seller=A3RN66K0NAYR9S	Monocho
88	amazon.com/sp?seller=A3RYKRC7R442GT	jialushop
89	amazon.com/sp?seller=A3T5WBBDI4A0ZB	Athena's little angel
90	amazon.com/sp?seller=A3UKOSYCYEY39P	QingYi Home Life
91	amazon.com/sp?seller=A3UOL6Y1C6TCG5	XINGDONG
92	amazon.com/sp?seller=A3USXBHAWMI1DT	DA.WA
93	amazon.com/sp?seller=A3UZ9PTPMBMKKM	Crydom
94	amazon.com/sp?seller=A3W2D0DQMHOSKE	SWFDe VVCC
95	amazon.com/sp?seller=A6YZSEQSS0OR2	zhangka's shop
96	amazon.com/sp?seller=A70NBCFALKPGO	BingYY
97	amazon.com/sp?seller=A72X109MB7VR7	fw stores
98	amazon.com/sp?seller=A7WJTASIY28AM	Work hard !
99	amazon.com/sp?seller=A882ZK5JQPLLQ	Artisan Department Store
100	amazon.com/sp?seller=A9224Y0OQSTKQ	GUOdandan
101	amazon.com/sp?seller=AB8ATNH9MMQII	heweiguo 2
102	amazon.com/sp?seller=ABXHPBZPXL7QA	yanni shop
103	amazon.com/sp?seller=AEJ1BUBVO27YH	Tanks Inc
104	amazon.com/sp?seller=AEJYZOD5P136B	shanluanmaoyi
105	amazon.com/sp?seller=AETU0XV6B6AZ2	Sx-PD
106	amazon.com/sp?seller=AINA9D8ZWCU82	liulinxianfeixiangjiadianjingxiaobu
107	amazon.com/sp?seller=AJ3GJZHAI4O8V	tudunbaihuo
108	amazon.com/sp?seller=AMX09576AO1HW	qiyujie
109	amazon.com/sp?seller=ANF7VMBLX305A	linminjian's shop
110	amazon.com/sp?seller=ANQB7ZJ6GSM6M	ANQB7ZJ6GSM6M
111	amazon.com/sp?seller=AOOSKACZO2NPA	ZF BEAUTY
112	amazon.com/sp?seller=AOP7YCH9P7W7S	BXPXXP
113	amazon.com/sp?seller=AOWP0201FGJW0	mfmfjy

114	amazon.com/sp?seller=ARBALFP98PC93	Knight return
115	amazon.com/sp?seller=ARRN81BRY9IGY	camelot2022
116	amazon.com/sp?seller=AUZN6SYLC638F	suirenjie's shop
117	amazon.com/sp?seller=AV5KPAEZUB65F	FYJCZDZS
118	amazon.com/sp?seller=AXHBTI3IROOOU	CAMADAR
119	amazon.com/sp?seller=AXKPL59VWTOUG	LINSTOREG
120	amazon.com/sp?seller=AYRQGI2JABK15	LvLiangShiLiShiQuXingQiBaiHuoShangDian
121	amazon.com/sp?seller=AYYVGMRSLOPOTM	Warm spring air (delivered in 8 to 15 days)
122	amazon.com/sp?seller=AZL0SGL0OFZMC	liupinhua's shop
123	wish.com/merchant/55af4cd4b5996b278b483009	shenzhenshijiajinfengmaoyiyouxiangongsi
124	wish.com/merchant/5603699a4eb06b4295cd610f	Perfectitems International
125	wish.com/merchant/577ca7d3d0d910110d208883	qingliu
126	wish.com/merchant/5800a75c1c813a2a6362ec79	Lucian
127	wish.com/merchant/5837023581089148b8d320a9	KFDHOP
128	wish.com/merchant/583ac9155374b81b97b66bea	majinrui
129	wish.com/merchant/596e2d25a26f6e725db4c7f3	catching life
130	wish.com/merchant/598448d060b5b22e92f2d5b8	guoxiaoqingder
131	wish.com/merchant/5a66de7c1893c21a1231f747	meishuang
132	wish.com/merchant/5b061e1fbb1392194509e95a	hordgeros
133	wish.com/merchant/5b5c20cf5d12795c5b8f3698	pengyueyuestoe
134	wish.com/merchant/5b7a9b4dbee82235feda323c	good boy and girl
135	wish.com/merchant/5d5001fd7ad2427c58f71fcf	lelelulu
136	wish.com/merchant/5d561ee941ed513f80e59d38	fuliwupin
137	wish.com/merchant/5dd9375f1fead208515e95a1	dghasdg45
138	wish.com/merchant/5dd9ef9ebcf24831c188d086	sdsjkj43
139	wish.com/merchant/5e6a9ba9d8fefcf10e61b856	kh04176
140	wish.com/merchant/5eba7d5563e9beeb94bc799d	babyboy 6969 store
141	wish.com/merchant/5eff2e6d4efdc9674c1cd88b	asuidyjkaa
142	wish.com/merchant/5f02cc6126d65c1cd22f11ca	iuywesda2
143	wish.com/merchant/5f02cdda773e9d134d446401	asdjklhasfs
144	wish.com/merchant/5fc796201f8786a8db3bf09a	mancosea
145	wish.com/merchant/606008f8f0c6ea78fff2f98a	jfjwjkdjfydjajd
146	wish.com/merchant/609c9bd75c70661f54b61afd	liudongdong668
147	wish.com/merchant/60ef47ec58ac3b0ec1f56721	Eventpink
148	wish.com/merchant/61629c0064260c4b47713f37	hechunli7338
149	wish.com/merchant/6162a15bb413e845914778dd	lilinxiang8716
150	wish.com/merchant/616545b9e51f894794de1d49	liuxiaodong9056
151	wish.com/merchant/61750423a335536b295932a3	qiaoyuzhu3361