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

NIRVANA, L.L.C.,

Plaintiff.

v.

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

Defendants.

Case No. 22-cv-01445

Judge Charles R. Norgle

Magistrate Judge Sheila M. Finnegan

## PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff Nirvana, L.L.C.'s ("Plaintiff" or "Nirvana") 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 stores<sup>1</sup> 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 products using infringing and counterfeit versions of Plaintiff's federally registered trademarks (the "NIRVANA Trademarks") to Illinois residents. A list of the NIRVANA Trademarks is included in the below chart.

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

REGISTRATION	REGISTERED	International
Number	TRADEMARK	CLASSES
1 926 905	NIRVANA	For: clothing; namely, shirts, tee
1,836,895	NIKVANA	shirts, caps in class 025.
		For: series of sound recordings
1,842,789	NIRVANA	all featuring performances of a
1,012,709	14114 7 11 47 1	musical artist or group in class
		009.
		For: Printed materials, namely,
		posters in class 016.
		For: Entertainment services,
		namely, providing a website
		with information on recordings
		of a musical group and historical
		information on a musical group
3,937,416	NIRVANA	and providing online profile
		pages with photos and
		information on recordings of a
		musical group; providing non-
		downloadable pre-recorded
		music and video clips via a
		website and online profile pages
		in class 041.
		For: Musical sound recordings;
		downloadable musical sound
		recordings; sound recordings
		featuring performances of a
		musical group; downloadable
		sound recordings featuring performances of a musical
		group; audiovisual recordings
1 663 544	NIRVANA	featuring music; audiovisual
4,663,544	INILAWINA	recordings featuring
		performances of a musical
		group; downloadable
		audiovisual recordings featuring
		music; downloadable
		audiovisual recordings featuring
		performances of a musical group
		in class 009.

5,430,930		For: Shirts; sweatshirts; hooded sweatshirts in class 025.
5,441,075		For: Audio and video recordings, namely, compact discs featuring music and musical performances; phonograph records featuring music; prerecorded digital media in the nature of audio and visual media, namely, CDs, DVDs, and downloadable audio and video recordings in the field of music; digital music downloadable from the internet; DVDs featuring music and musical performances; downloadable audio and video recordings, namely, downloadable music files, downloadable multimedia files containing audio and video relating to music and musical performances, downloadable MP3 files and MP3 recordings featuring music and musical performances, and downloadable musical and video recordings in the field of music in class 009.
1,797,928	FLOWER SNIFFIN KITTY PETTIN BABY KISSINCORPORATE ROCK WHORES	For: clothing; namely, tee shirts 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 Plaintiff's previously granted Motion for Entry of a Temporary Restraining Order establishes that Plaintiff has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted. Specifically, Plaintiff has proved a prima facie case of trademark infringement because (1) the NIRVANA 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 NIRVANA Trademarks, and (3) Defendants' use of the NIRVANA Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with Plaintiff. Furthermore, Defendants' continued and unauthorized use of the NIRVANA Trademarks irreparably harms Plaintiff through diminished goodwill and brand confidence, damage to Plaintiff's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Plaintiff 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 NIRVANA 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 NIRVANA

- product or not authorized by Plaintiff to be sold in connection with the NIRVANA Trademarks;
- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Nirvana product or any other produced by Plaintiff, that is not Plaintiff's or not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under the NIRVANA 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 the NIRVANA Trademarks and damaging Plaintiff's 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 Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear any of Plaintiff's trademarks, including the NIRVANA Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof.
- 2. Upon Plaintiff'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"), Walmart, Inc. ("Walmart") and DHgate (collectively, the "Third Party Providers") shall, within seven (7) calendar 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 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, 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"), eBay, Alipay, Alibaba, Ant Financial Services Group ("Ant Financial"), Amazon Pay, Wish.com, Walmart, DHgate, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
- 3. Upon Plaintiff's request, those with notice of the injunction, including the Third Party Providers as defined in Paragraph 2, shall, within seven (7) calendar 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 NIRVANA Trademarks.

- 4. 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.
- 5. Any Third Party Providers, including PayPal, eBay, Alipay, Alibaba, Ant Financial, Wish.com, Walmart, DHgate, and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:
  - a. locate all accounts and funds connected to Defendants' Seller Aliases and Online Marketplaces, 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. Plaintiff is authorized to issue expedited written discovery, pursuant to the 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 and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces.

Plaintiff 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. Plaintiff 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 the e-mail addresses 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 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 2 to the Declaration of Pete D'Auria [17], and the TRO [22] 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 Plaintiff shall remain with the Court until a Final disposition of this case or until this Preliminary Injunction is terminated.

DATED: April \_\_\_\_\_\_, 2022

IT IS SO ORDERED.

Charles

LSDJ

Charles R. Norgle
United States District Judge

Nirvana, L.L.C. v. The Partnerships and Unincorporated Associations Identified on Schedule
"A" - Case No. 22-cv-01445

## Schedule A

	Defendant Online Marketplaces		
No	No URL Name / Seller Alias		
		Dongguan Humen AS Fashion	
1	asfashionlabel.en.alibaba.com	Factory	
2	cookids.en.alibaba.com	Foshan Didibubu Apparel Co., Ltd.	

	dhua an althaba as w	Data via tal il Data a
3	dhxq.en.alibaba.com	Dehua Xinqi Plastic Products Factory
	harmall on althabaras	Shenzhen Hanghui Technology Co.,
4	houwell.en.alibaba.com	Ltd.
5	newsunglasses.en.alibaba.com	Linhai Mingqiu Glasses Co., Ltd.
6	shirtment.en.alibaba.com	Guangzhou Xiake Trading Co., Ltd.
7	xiaoyeah.en.alibaba.com	Quanzhou Xiaoye Trading Co., Ltd.
8	ybicl.en.alibaba.com	Yubao (g.z) Industry Co., Ltd.
9	yiyouyanjing.en.alibaba.com	Linhai Yiyou Glasses Co., Ltd.
10	yoowell.en.alibaba.com	Yuyue Apparel (Guangzhou) Co.,Ltd.
11	ywxuanxin.en.alibaba.com	Yiwu Xuanxin Trading Co., Ltd.
12	aliexpress.com/store/1100011071	Shop1100011071 Store
13	aliexpress.com/store/1100019057	zhaojunbo518 Store
14	aliexpress.com/store/1100037131	Shop1100037131 Store
15	aliexpress.com/store/1100082226	Shop1100082226 Store
16	aliexpress.com/store/1100087222	Shop1100087222 Store
17	aliexpress.com/store/1748079	Wonderbee Store
18	aliexpress.com/store/1795440	Ebuying online
19	aliexpress.com/store/2971001	queenkid baby Store
20	aliexpress.com/store/3471023	Ailsa Life Store
21	aliexpress.com/store/3523083	XIPENG Mens Wardrobe Store
22	aliexpress.com/store/4003016	plegie Menswear Store
23	aliexpress.com/store/4430143	YUQI Official Store
24	aliexpress.com/store/5051437	Arbitmatch Official Store
25	aliexpress.com/store/510483	uncledonjm Official Store
26	aliexpress.com/store/5256016	Street Wardrobe Store
27	aliexpress.com/store/5741132	OT Men Store
28	aliexpress.com/store/5876034	Your followers Store
29	aliexpress.com/store/900237042	Shop900237042 Store
30	aliexpress.com/store/910357058	Shop910357058 Store
31	aliexpress.com/store/910731033	A-B-C_ Store
32	aliexpress.com/store/910750026	Enjoy-Stickers Store
33	aliexpress.com/store/911115014	Ali Gege Store
34	aliexpress.com/store/911123107	Shop911123107 Store
35	aliexpress.com/store/911261092	TIDESHEC Store
36	aliexpress.com/store/911304202	Shufeiya Shorts Sets Store
37	aliexpress.com/store/911520080	Shop911520080 Store
38	aliexpress.com/store/911751413	ZengYunTing Store
39	aliexpress.com/store/911753843	007 New Store
40	aliexpress.com/store/911759236	Ziyang factory Store
41	aliexpress.com/store/911812128	MadeExtreme BlackAir Store
42	aliexpress.com/store/911840250	TrendyStyle Store
43	aliexpress.com/store/912151528	Sticker world Store

aliexpress.com/store/912221328	shoe decorchm Store
aliexpress.com/store/912262444	Art factory 88 Store
	YouErZhiPei Global Store
aliexpress.com/store/912351390	EasyGet Store
aliexpress.com/store/912458930	ZHMT Decor Store
aliexpress.com/store/912469872	Beautiful Life Wood Applique Store
aliexpress.com/store/912485673	Dazzling wardrobe Store
aliexpress.com/store/912515218	maiji Store
aliexpress.com/store/912578149	Beautiful T-shirt AS Store
aliexpress.com/store/912588100	LoveGoodSoul Store
aliexpress.com/store/912620675	HL168 Store
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85	amazon.com/sp?seller=A3BFGJ09DJ3E5P	zhangleishangmao
86	amazon.com/sp?seller=A3C0Al1P9OERY1	guanxushangmao
87	amazon.com/sp?seller=A3DGAC8E3IHQLN	Mortd
88	amazon.com/sp?seller=A3FRYTOA3GEV6V	ruzhoushiyongshangshangmao
89	amazon.com/sp?seller=A3H6RABZZUJXU9	T-Xianyichi
90	amazon.com/sp?seller=A3HZKUV3HZ3JSC	NOGWH
91	amazon.com/sp?seller=A3I6913X5B86WX	Walking Hero
92	amazon.com/sp?seller=A3K61XKXTGQ72O	yiqistore
93	amazon.com/sp?seller=A3QHPBWAUVRJDW	liyuehuidedian
94	amazon.com/sp?seller=A3U4AALEXU8WZY	yangmin Poster Shop
95	amazon.com/sp?seller=A3U9QW5BPL2VEH	GOODOD
		hefeicichengwangluokejiyouxiangon
96	amazon.com/sp?seller=A3UQDZPCJ9H1JU	gsi
97	amazon.com/sp?seller=A3VHUN547YEKWV	Liu FuYi Poster
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110	cocopie.en.alibaba.com	Xiamen Cocopie Trading Co., Ltd.
111	dhgate.com/store/17960071	lionkinglee Store
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114	dhgate.com/store/21703410	ourlove_88
		Ganzhou Manqu E-Commerce Co.,
115	manqu.en.alibaba.com	Ltd.
116	poster.en.alibaba.com	Shandong Win forever Print Co., Ltd
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