

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

GENERAL MOTORS LLC,

Plaintiff,

v.

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

Defendants.

Case No. 22-cv-01605

Judge Gary Feinerman

Magistrate Judge Sunil R. Harjani

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff General Motor LLC’s (“Plaintiff” or “GM”) Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS GM’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 (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 counterfeit and infringing versions of GM’s federally registered trademarks (“Chevrolet Trademarks”) to residents of Illinois. A list of the GM Trademarks is included in the below chart.

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

Registration No.	Trademark	Class	Goods and Services
647,235	CHEVROLET	037	Maintenance and repair service for automotive vehicles, parts, and accessories.
1,471,518	CHEVROLET	028	Toys and playthings, namely, toy vehicles, toy cars, toy model hobbycraft kits.
1,661,627	CHEVROLET	012	Motor land vehicles, namely, automobiles, passenger vans, cargo vans, sport utility vehicles, pick-up trucks, commercial land vehicles, namely, automobiles, trucks, vans, sport utility vehicles, chassis for the foregoing and any combination thereof and structural parts therefor, engines therefor, and structural parts thereof; cabs and chassis for trucks; chassis for vans
1,667,108	CHEVROLET	042	Automobile and truck dealership services
1,708,169	CHEVROLET	016	Printed materials, namely, manuals, brochures, and catalogs pertaining to the features and controls, operation, maintenance, service and repair, and technical facts and specifications of motor vehicles
2,309,369	CHEVROLET	024	Cloth banners, cloth flags and bed blankets
2,311,214	CHEVROLET	006	Metal license plates
2,348,249	CHEVROLET	025	Shirts, sweaters, jackets, hats, clothing ties, pants and shorts
2,522,861	CHEVROLET	028	Balloons, Christmas tree ornaments, collectible toy

			cars, die cast vehicle models, golf bags, golf ball markers, golf balls, golf clubs, golf tees, peddle cars, coin operated pinball machines, plastic toy vehicle model hobbycraft kits, plastic toy model kit cars, radio controlled cars, coin operated video games and hand held units for playing video games
2,563,091	CHEVROLET	006	Metal money clips, metal knobs, non-mechanical metal street signs, non-mechanical metal parking signs, non-mechanical tin signs, metal key rings, metal license plates
4,195,243	CHEVROLET MYLINK	012	Electronic interface modules sold as an integral part of a motor land vehicle for wired and wireless interface of handheld electronic devices
2,469,555	CHEVROLET RACING	016	Pressure sensitive graphics, namely, decals, stickers, bumper stickers
4,321,360	CHEVROLET SPARK	012	Motor land vehicles, namely, automobiles
2,313,769	CHEVROLET USA-1	006	Metal license plates
3,506,116	CHEVROLETOR	028	Toy vehicles
2,357,128	CHEVY	016	Pressure sensitive graphics for application to automobiles and automobile dealership windows, decals, stickers, bumperstickers, calendars
2,308,986	CHEVY	025	Shirts, sweaters, jackets, hats, shorts
1,494,385	CHEVY	028	Toys and playthings; namely, toy vehicles, toy cars, toy model battery-operated remote and radio-

			controlled toy vehicles, friction powered toy vehicles and hobbycraft kits
2,543,117	CHEVY TRUCKS	021	Beverage glassware, bottle openers, can wraps, mugs
2,609,931	CHEVY TRUCKS	025	Clothing, namely, aprons, caps, coat, dress shirts, gloves, golf shirts, hats, jackets, polo shirts, rainwear, sunvisors, sweat shirts, t-shirts and vests
2,649,537	CHEVY TRUCKS	020	Chairs, desk ornaments made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, picture frames, plaques, plastic flags, seat cushions, stools
2,313,756	CAMARO	006	Metal license plates
2,356,823	CAMARO	025	Shirts, sweaters, jackets, blazers, hats, clothing ties, sweat suits, pants and shorts
2,654,526	CAMARO	020	Desk ornaments, made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, mirrors, non-metal money clips, picture frames, pillows, plastic flags, seat cushions, stools

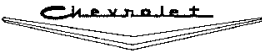
3,126,223	CAMARO	012	Automobile bumpers, automotive windshield shade screens fitted covers for vehicles, vehicle seat covers
3,628,953	CAMARO	012	Motor land vehicles, namely, automobiles, engines therefor and structural parts thereof
4,246,081	CAMARO	028	Toy vehicles
4,246,082	CAMARO	009	Video game software
1,470,779	CAMARO Z-28	028	Toys and playthings, namely, toy vehicles, toy cars, toy model hobbycraft kits
4,646,598	CANYON	012	Motor land vehicles, namely, trucks
5,046,433	CANYON NIGHTFALL EDITION	012	Motor vehicles parts and accessories, namely, option package for black motor vehicles comprised of a black grille, black 5-inch assist steps, 18-inch aluminum wheels, polished exhaust tips, spray-in bedliner, remote start and automatic climate control, sold as a unit
2,311,794	CHEVELLE	006	Metal license plates
4,431,312	CHEVELLE	012	Exterior badges for vehicles
4,431,313	CHEVELLE	025	Clothing, namely, t-shirts, hats, sweatshirts
4,431,314	CHEVELLE	028	Toy vehicles
4,431,315	CHEVELLE	027	Floor mats for vehicles
4,646,599	COLORADO	012	Motor land vehicles, namely, trucks
5,350,973	COMMERCIAL LINK	009	Software application which allows subscribers to obtain vehicle information
5,138,021	COOL SHIELD	002	Corrosion-inhibiting coating sold as a component ingredient of brake rotors for land








			vehicles
3,970,828	COPO	012	Automobile engines and structural parts
4,151,421	COPO	012	Automobiles
5,726,814	COPO	025	Shirts and short-sleeved shirts, polo shirts, sweat shirts, jackets, baseball caps and hats, beanies
1,467,522	CORVETTE	028	Toys and playthings, namely, toy vehicles, toy cars, toy model hobbycraft kits
1,494,171	CORVETTE	014	Jewelry; namely, quartz watches
1,494,980	CORVETTE	009	Eyeglasses
1,495,033	CORVETTE	012	Motor vehicles; namely, automobiles, engines therefor, and structural parts thereof
1,792,602	CORVETTE	016	Printed materials; namely, manuals, brochures, and catalogs pertaining to the features and controls, operation, maintenance, service and repair, and technical facts and specifications of motor vehicles
2,311,215	CORVETTE	006	Metal license plates
2,314,485	CORVETTE	025	Shirts, sweaters, jackets, blazers, hats, clothing ties, sweat suits and shorts
2,463,898	CORVETTE	006	Metal money clips, metal gear shift knobs, non-mechanical metal street signs, non-mechanical metal parking signs, non-mechanical tin signs, metal key rings, metal license plates
3,147,782	CORVETTE C6	025	Clothing, namely, shirts, sweatshirts and t-shirts
4,150,438	CORVETTE GRAND SPORT	012	Motor land vehicles,






			namely, automobiles
5,643,759	CRUZE PREMIER	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,382,628	EL CAMINO	012	Upholstery for motor land vehicles; exterior and interior badges for motor land vehicles
2,854,854	EQUINOX	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
2,757,501	EXPRESS ACCESS	012	Motor land vehicles, namely, vans, engines therefor, and structural parts thereof
2,308,987	GENUINE CHEVROLET	006	Metal license plates
2,538,435	GENUINE CHEVROLET	021	Beverage glassware, can wraps, coasters, coolers, cups, mugs
2,678,108	GENUINE CHEVROLET	009	Computer mouse pads, neon signs; thermometers not for medical use
4,444,192	HIGH COUNTRY	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks and vans
661,322	IMPALA	012	Automobiles
2,311,798	IMPALA	006	Metal license plates
2,669,222	IMPALA	020	Chairs, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, picture frames, plastic flags, stools
4,275,949	L88	016	Decals
4,275,878	L88	012	Exterior and interior



			badges for motor land vehicles
4,382,776	LT-1	016	Decals
4,713,011	LT1	012	Engines for automobiles, sport utility vehicles, trucks and vans
2,092,090	MALIBU	012	Motor vehicles, namely, automobiles, engines therefor and structural parts thereof
2,663,321	MALIBU	020	Desk ornaments made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, nonmetal key tags, non-metal license plates, mirrors, non-metal money clips, picture frames, seat cushions and stools
5,675,518	MALIBU PREMIER	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
2,430,738	MONTE CARLO	006	Metal license plates
2,681,174	MONTE CARLO	020	Non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, plaques
2,637,279	ROADRESPONSE	012	Struts and shock absorbers for land motor vehicle suspensions
1,039,220	SILVERADO	012	Motor vehicles; namely, trucks
1,519,946	STINGRAY	028	Toys and playthings; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles,





			and toy model hobbycraft kits
1,750,042	STINGRAY	012	Nameplates for motor land vehicles
4,436,811	STINGRAY	012	Motor land vehicles, namely, automobiles
1,490,090	SUBURBAN	012	Motor vehicles, namely, trucks, engines thereof and structural parts therefor
2,652,035	SUBURBAN	020	Chairs, desk ornaments made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, plastic flags, seat cushions
1,880,529	TAHOE	012	Motor vehicles, namely trucks, engines therefor, and structural parts thereof
2,652,036	TAHOE	020	Chairs, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, plastic flags, seat cushions
3,537,570	TRAVERSE	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,704,309	TRAX	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,275,899	TURBO-FIRE	016	Decals
4,275,896	TURBO-JET	012	Exterior and interior badges for motor land vehicles




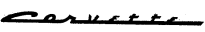

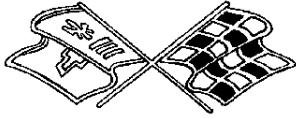
4,275,897	TURBO-JET	016	Decals
2,316,536	Z/28	025	Shirts, Jackets, Hats
2,538,434	Z06	025	Clothing, namely, caps, coats, dress shirts, golf shirts, hats, jackets, polo shirts, sunvisors, sweat shirts, sweaters, t-shirts
2,008,406	Z71	012	Modified off road chassis sold as components of trucks
2,308,988	Z71	025	Shirts, jackets, hats
2,654,527	Z71	020	Chairs, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, plastic flags
5,027,847	Z71 TRAIL BOSS	012	Passenger vehicles, namely, light duty pickup trucks
4,279,992	ZR2	016	Decals
5,566,056	ZR2	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,172,493	ZL1	012	Motor land vehicles, namely, automobiles
4,117,179	ZL1	007	Automotive engine blocks
216,070	CHEVROLET	012	Automobiles
1,540,658		028	Toys and playthings; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, friction-powered toy vehicles, and toy model hobbycraft kits

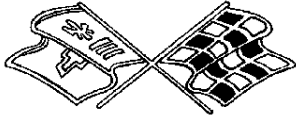



647,236		037	Maintenance and repair service for automotive vehicles, parts, and accessories
2,311,397		025	Shirts, jackets, hats, clothing ties and shorts
2,563,092		006	Metal money clips, metal knobs, non-mechanical metal street signs, non-mechanical metal parking signs, non-mechanical tin signs, metal key rings, metal license plates
2,678,153		020	Non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, non-metal money clips, stools
1,540,884		037	Maintenance and repair services for motor vehicles, parts and accessories
2,311,791		006	Metal license plates
2,311,792		025	Shirts, sweaters, jackets, blazers, hats, clothing ties, sweat suits, pants and shorts






2,311,918		024	Cloth banners, cloth flags, and bed blankets
2,538,436		021	Beverage glassware, bottle openers, can wraps, coasters, commemorative plates, coolers, corkscrews, cups, glass canisters, ice scrapers with brushes, mugs, ornament replicas of vehicles made of glass, crystal and ceramic, portable containers, salt and pepper shakers, service trays, squeeze bottles and steins
2,550,170		028	Balloons, Christmas tree ornaments, collectible toy cars, diecast vehicle models, golf balls, peddle cars, pinball machines, plastic vehicle kits, plastic vehicle models, radio controlled cars
2,562,025		014	Belt buckles, charms, clocks, coins, cuff-links, earrings, lapel pins, money clips, pendants, rings, watches
2,578,898		025	Aprons, gloves, headbands, rainwear, robes, scarves, sleepwear, slippers, socks, sunvisors, sweaters, and vests









2,734,714		009	Binoculars; calculators; photographic cameras; directional compasses; computer mouse pads; computer mice; computer game software for use in arcade games, hand held electronic games and video games; computer screen saver software; electric signs; eyeglass cases; eyeglasses; computer and video game cartridges; video game interactive hand held remote controls for playing electronics games; hand held joy stick units for playing video games; graduated rulers; interactive video games of virtual reality comprised of computer software and hardware; decorative magnets; magnifying glasses; neon signs; prerecorded videotapes featuring information on automobiles; radio antennas; radios; sunglasses; tape measures; telephones; thermometers not for medical use; tire pressure gauges; video rewinders; yard sticks
2,736,654		020	Badge holders made of plastic, chairs, desk ornaments made of bone, ivory, plaster, plastic, wax and wood, non-metal jewelry boxes, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates,









			mirrors, non-metal money clips, name badges made of plastic, name plates made of plastic, picture frames, pillows, plaques, plastic flags, seat cushions, stools
2,779,456		006	Metal banks, metal decorative boxes, ingots of common metal, metal key chains, metal key fobs, metal key rings, metal keys, license plates made of metal, non-luminous and non-mechanical metal signs, money clips made of metal, ornamental replicas of vehicles made of metal, non-luminous and non-mechanical parking signs made of metal, non-luminous and non-mechanical street signs made of metal, metal tool boxes
95,398		012	Automobiles, motor-vehicles, and parts thereof
1,519,942		028	Toys and play-things; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, friction-powered toy vehicles, and toy model hobbycraft kits
1,530,792		014	Clocks






1,661,628		012	Motor land vehicles;; namely, automobiles, passenger vans, cargo vans, sport utility vehicles, pick-up trucks, commercial land vehicles;; namely, automobiles, trucks, vans, sport utility vehicles, chassis for the foregoing and any combination thereof and structural parts therefor, engines therefor, and structural parts thereof; cabs and chassis for trucks; chassis for vans
1,668,924		042	Automobile and truck dealership services
2,555,071		006	Non-luminous and non-mechanical metal street signs and parking signs, metal license plates, and metal key rings
579,485		012	Automobiles
2,311,399		025	Shirts, jackets, hats, clothing ties, sweat suits
2,631,880		016	Automotive books; bank checks; bumper stickers; desktop business card holders; business cards; calendars; checkbook covers; decals; greeting cards; note pads; paperweights; pen and pencil holders; pens; pictures; playing cards; posters; lithographic prints; trading and collector cards


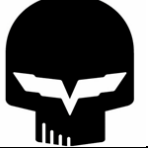


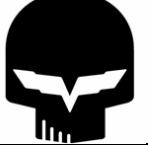


2,654,528		020	Chairs, desk ornaments, made of bone, ivory, plaster, wax, wood, china, crystal, glass and porcelain, jewelry boxes not of metal, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, non-metal money clips, picture frames, pillows, plaques, plastic flags, seat cushions, stools
2,750,257		020	Desk ornaments made of plastic, and wood, jewelry boxes not of metal, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal novelty license plates, non-metal money clips, picture frames, plaques
2,232,346		016	Printed materials; namely, manuals, brochures, and catalogs pertaining to the features and controls, operation, maintenance, service and repair, and technical facts and specifications of motor vehicles
2,242,877		009, 014, 016, 018, 021, 025	Sunglasses, eyeglass cases and computer peripheral mouse pads Jewelry, namely, tie tacks, lapel pins, watches and charms Note pads, playing cards, posters









			<p>Umbrellas, luggage, gym bags, leather key fobs, briefcase-type portfolios, attache cases and wallets</p> <p>Mugs, portable coolers, coasters not of paper and not being table linen and beverage glassware</p> <p>Shirts, sweaters, jackets, hats, clothing ties, sweat suits and shorts</p>
2,683,719		020	<p>Chairs, desk ornaments, namely, ornaments of plastic or wood, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, picture frames, pillows, plaques, plastic flags, seat cushions, stools</p>
3,739,089		009	<p>Sunglasses, sunglass cases, computer mouse, laptop carrying cases, CD cases, neon signs</p>
3,739,090		012	<p>Fitted dashboard covers for vehicles, vehicle tire valve stem caps, fitted covers for vehicles, license plate frames</p>
3,739,092		018	<p>Wallets, duffle bags, backpacks, umbrellas, trunks</p>
3,739,093		020	<p>Stools</p>










3,739,094		021	Beverage glassware, mugs, travel insulated beverage containers
3,739,096		025	Clothing, namely, t-shirts, hats, jackets, shirts, sweatshirts, coats, bandanas
3,739,097		027	Floor mats for vehicles
3,739,098		028	Toy vehicles
4,482,475		012	Motor land vehicles, namely, automobiles, engines therefor and structural parts thereof
4,597,263		028	Toy vehicles, ride-on toy vehicles, remote controlled toy vehicles
4,601,524		014	Lapel pins, watches
4,601,525		016	Posters, pens, calendars, blank journal books







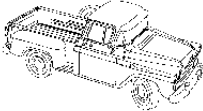

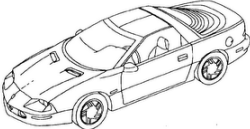
4,601,526		021	Mugs, travel mugs, drinking glasses, water bottles sold empty, portable beverage coolers
4,601,527		025	Shirts, hats, jackets, coats, pullovers
4,719,036		006	Non-luminous and non-mechanical metal signs
4,719,043		018	Duffel bags, leather credit card cases
2,545,728		025	Clothing, namely, shirts, t-shirts, jogging suits, sweat shirts, sweat pants, bandanas, sweaters, socks, hats, leather jackets, coats, ties, jackets
1,491,293		028	Toys and plaything; namely, toy vehicles, toy cars, toy model hobbycraft kits, battery-operated remote and radio-controlled toy vehicles; and friction powered toy vehicles
1,494,172		014	Jewelry; namely quartz watches and gold rings
2,311,917		025	Shirts, sweaters, jackets, blazers, hats, clothing ties, sweat suits, pants and shorts

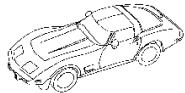
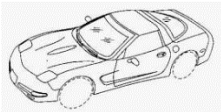
2,545,133		016	Automotive books, bank checks, bumper stickers, business card holders, business cards, calendars, checkbook covers, children's activity books, decals, note pad holders, note pads, paperweights, pen and pencil holders, pens, photo albums, pictures, playing cards, posters, reproduction lithographic prints, trading and collector cards
2,578,899		025	Sleepwear, sunvisors, and vests
2,666,595		020	Chairs, desk ornaments made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, jewelry boxes not of metal, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, mirrors, picture frames, pillows, plaques, plastic flags, plastic storage bins, seat cushions, stools
6,190,715		012	Motor land vehicles, namely, automobiles, engines therefor and structural parts thereof
6,639,689		006, 014, 016, 018, 021, 025, 028	Non-luminous and non-mechanical metal signs Posters, pens, calendars, blank journal books Duffel bags, leather credit card cases.

			<p>Mugs, travel mugs, drinking glasses, water bottles sold empty, non-electric portable beverage coolers</p> <p>Shirts, hats, jackets, coats, pullovers</p> <p>Toy vehicles, remote controlled toy vehicles</p>
6,433,801		012	Vehicle windshields; vehicle windows
3,650,649		006	Metal holiday ornaments; sculptures made of metal
3,650,651		016	Posters, decals, pressure sensitive graphics for application to automobiles, desktop business card holders
3,650,654		021	Beverage glassware
3,650,657		022	Lanyards for holding badges and passes
4,514,976		012	Motor land vehicles, namely, automobiles
4,597,272		021	Mugs, travel mugs

4,597,273		025	Shirts, hats
4,597,275		028	Toy vehicles, ride-on toy vehicles, remote controlled toy vehicles
4,597,292		006	Non-luminous and non-mechanical metal signs
4,601,531		014	Lapel pins
4,601,532		016	Pens, posters, blank journal books
2,700,379		020	Chairs, non-metal key chain non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, stools
4,863,379		025	Clothing, namely, hats and shirts
4,863,380		014	Lapel pins

4,863,381		006	Non-luminous and non-mechanical metal signs
4,863,382		016	Posters, calendars
4,863,383		020	Decorative mirror
4,863,384		021	Stone coasters
4,863,385		024	Cloth banners
5,004,543		012	Motor land vehicles, namely, automobiles
1,506,101		028	Toys and playthings; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, friction-powered toy vehicles, and toy model hobbycraft kits
2,346.738		025	Shirts, jackets, and hats
1,898,835		012	Motor vehicles, namely automobiles, engines therefor, and structural parts thereof

2,346,737		025	Shirts, jackets, hats, pants
2,346,904		016	Stickers and calendars
2,349,761		006	Metal license plates
2,756,065		020	Non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal novelty license plates
2,721,375		020	Key fobs, key tags, key chains and key rings not made of metal; non-metal license plates
2,705,700		028	Toy vehicles
2,705,698		028	Toy vehicles
2,705,697		028	Toy vehicles
2,705,702		028	Toy vehicles

2,708,261		028	Toy vehicles
3,161,525		028	Miniature models of vehicles, toy vehicles, toy model hobby kits for the construction of toy vehicles, collectable toy cars

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 GM’s previously granted Motion for Entry of a Temporary Restraining Order establishes that GM has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that GM will suffer irreparable harm if the injunction is not granted. Specifically, GM has demonstrated a *prima facie* case of trademark infringement because (1) the Chevrolet 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 Chevrolet Trademarks, and (3) Defendants’ use of the Chevrolet Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants’ products with GM. Furthermore, Defendants’ continued and unauthorized use of the Chevrolet Trademarks irreparably harms GM through diminished goodwill and brand confidence, damage to GM’s reputation, and loss of exclusivity. Monetary damages fail to address such damage and, therefore, GM 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. using the Chevrolet 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 Chevrolet product or not authorized by GM to be sold in connection with the Chevrolet Trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Chevrolet product or any other product produced by GM, that is not GM's or not produced under the authorization, control or supervision of GM and approved by GM for sale under the Chevrolet Trademarks;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of GM, or are sponsored by, approved by, or otherwise connected with GM;
 - d. further infringing the Chevrolet Trademarks and damaging GM'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 GM, nor authorized by GM to be sold or offered for sale, and which bear any of GM's trademarks, including the Chevrolet Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof.

2. Upon GM'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 GM expedited discovery, limited to copies of documents and records in such person's or entity's possession or control sufficient to determine:
 - 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 and DHgate, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

3. Upon GM'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 Chevrolet Trademarks.
4. Defendants shall not transfer or dispose of any money or other Defendants' assets in any of Defendants' financial accounts.
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. GM is authorized to issue expedited written discovery to Defendants, 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 and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces.

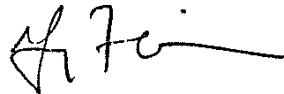
GM is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

7. GM 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 2 to the Declaration of Andrea Ankawi [19], and the TRO [25] are unsealed.
9. Any Defendant or other persons that is 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 GM 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 25, 2022

A handwritten signature in black ink, appearing to read "G. Feinerman", written over a horizontal line.

Gary Feinerman
United States District Judge

**General Motors LLC v. The Partnerships and Unincorporated Associations Identified on
Schedule "A" - Case No. 22-cv-01605**

Schedule A

Defendant Online Marketplaces		
No	URL	Name / Seller Alias
1	amazon.com/sp?seller=A2LO939C2H7KGB	chengdoumoquxinmaoyiyouxiangongsi
2	amazon.com/sp?seller=A2O0ADZJW55XKE	JOJOMARK
3	amazon.com/sp?seller=A2PP15ANLUKZDA	shi jihuang
4	amazon.com/sp?seller=A2R0WE9YR6R4PM	LIXINPARTS
5	amazon.com/sp?seller=A2UJVABJ1Z7060	Haocc Loud
6	amazon.com/sp?seller=A2UNTIEUHH7OXS	Happy led lights bar
7	amazon.com/sp?seller=A30S00JZPEP7G0	Poly Motor
8	amazon.com/sp?seller=A34LKE9N292JS9	xiangpeihuazhuangpin
9	amazon.com/sp?seller=A370ROAJ0UKSRO	XIAOBAIMAIJIALA
10	amazon.com/sp?seller=A37BLQOSSRXZAS	Mulistory
11	amazon.com/sp?seller=A382CX7K9LCF1M	AUTOFLYING
12	amazon.com/sp?seller=A3B79WBZ5VS8NV	ArBRosa
13	amazon.com/sp?seller=A3EU25P8LVPYG4	LianChengXianXueYingNanBaiHuoShang Hang
14	amazon.com/sp?seller=A3KI3780HX0PQQ	Dgimis
15	amazon.com/sp?seller=A3LWCUF9K4BY8W	litingwang
16	amazon.com/sp?seller=A3PHW5DYMKNKVOA	Pure Coil
17	amazon.com/sp?seller=A3QUWFTATF95GN	Capume Direct
18	amazon.com/sp?seller=A3TCMBB2D524FE	A3TCMBB2D524FE
19	amazon.com/sp?seller=A3VMWXINR3EB9H	fuquyuanshangmao
20	amazon.com/sp?seller=A5ZX56YU0SMT	Htostar Racing
21	amazon.com/sp?seller=A9JCSRNL2NKR	GOOSLA
22	amazon.com/sp?seller=A9OTQNU8ATMGD	KSDHFH
23	amazon.com/sp?seller=AAZGJ80PW23CG	CHECHAOXUAN
24	amazon.com/sp?seller=AC587NI1QWOED	IKMENE
25	amazon.com/sp?seller=AEFN1GMB2IMI2	Dlylum
26	amazon.com/sp?seller=AETOZTTZM9DR4	leinuozhuangshigongcheng
27	amazon.com/sp?seller=ALFTVRPT12PZM	JINGSEN
28	amazon.com/sp?seller=AOCK3TQB8H0AY	wangchaochaoshangmaoyouxiangongsi
29	amazon.com/sp?seller=AP55Y0BEENNZP	Luckydecals
30	amazon.com/sp?seller=ASPK728CC2BNY	VVK Online
31	ebay.com/sch/kenua88	kenua88
32	ebay.com/usr/apluscarhome	apluscarhome

33	ebay.com/usr/auto_supermarket	auto_supermarket
34	ebay.com/usr/autoaccessories-autoparts	autoaccessories-autoparts
35	ebay.com/usr/autobestpartner	autobestpartner
36	ebay.com/usr/auto-grilleworld	auto-grilleworld
37	ebay.com/usr/automotivegalaxy	automotivegalaxy
38	ebay.com/usr/autoparts_2017	autoparts_2017
39	ebay.com/usr/autopproducts_2021	autopproducts_2021
40	ebay.com/usr/autoprotector-autoparts	autoprotector-autoparts
41	ebay.com/usr/autoscuff-autoparts	autoscuff-autoparts
42	ebay.com/usr/autoshop2020	autoshop2020
43	ebay.com/usr/autosill-autoparts	autosill-autoparts
44	ebay.com/usr/autostrip-autoparts	autostrip-autoparts
45	ebay.com/usr/autotrim0913	autotrim0913
46	ebay.com/usr/awsemcarshop	awsemcarshop
47	ebay.com/usr/baixiang1231	baixiang1231
48	ebay.com/usr/bgjoy20	bgjoy20
49	ebay.com/usr/bjysyd2018	bjysyd2018
50	ebay.com/usr/buminee-love-life	buminee-love-life
51	ebay.com/usr/butterfly285	butterfly285
52	ebay.com/usr/buyu555	buyu555
53	ebay.com/usr/cardvdlcd	cardvdlcd
54	ebay.com/usr/carhanson-autoparts	carhanson-autoparts
55	ebay.com/usr/carpartskindom	carpartskindom
56	ebay.com/usr/carprotector-autoparts	carprotector-autoparts
57	ebay.com/usr/charminghorse2016	charminghorse2016
58	ebay.com/usr/cision96	cision96
59	ebay.com/usr/cn_coolcar_trend_04	cn_coolcar_trend_04
60	ebay.com/usr/cool_carmotor_01	cool_carmotor_01
61	ebay.com/usr/cwz2017-4	cwz2017-4
62	ebay.com/usr/cxnd6414	cxnd6414
63	ebay.com/usr/dde8691	dde8691
64	ebay.com/usr/dhgauto_luck	dhgauto_luck
65	ebay.com/usr/eforcar	eforcar
66	ebay.com/usr/eshophuo	eshophuo
67	ebay.com/usr/ff9882	ff9882
68	ebay.com/usr/focus-parts	focus-parts
69	ebay.com/usr/fshophuo	fshophuo
70	ebay.com/usr/gdtq1179	gdtq1179
71	ebay.com/usr/gongxifacai-999	gongxifacai-999
72	ebay.com/usr/good-77parts	good-77parts
73	ebay.com/usr/gupiaoguang	gupiaoguang

74	ebay.com/usr/ha-auto-modification	ha-auto-modification
75	ebay.com/usr/happy105	happy105
76	ebay.com/usr/h-banana	h-banana
77	ebay.com/usr/hongshu_automobile	hongshu_automobile
78	ebay.com/usr/hot-rapid-store	hot-rapid-store
79	ebay.com/usr/huangcstore	huangcstore
80	ebay.com/usr/hwc515i	hwc515i
81	ebay.com/usr/ibai-29	ibai-29
82	ebay.com/usr/jiaang618	jiaang618
83	ebay.com/usr/jiajia-168	jiajia-168
84	ebay.com/usr/jinxiudeshangmao	jinxiudeshangmao
85	ebay.com/usr/jsbe1266	jsbe1266
86	ebay.com/usr/jxdyfq	jxdyfq
87	ebay.com/usr/libaoshi5934	libaoshi5934
88	ebay.com/usr/liurongmin6969	liurongmin6969
89	ebay.com/usr/lixian-2show	lixian-2show
90	ebay.com/usr/ljq20-45	ljq20-45
91	ebay.com/usr/loving-watches-store	loving-watches-store
92	ebay.com/usr/lvwf7127	lvwf7127
93	ebay.com/usr/maotashangdian	maotashangdian
94	ebay.com/usr/mianyangxinxiangheshangmao	mianyangxinxiangheshangmao
95	ebay.com/usr/momoda_2019	momoda_2019
96	ebay.com/usr/muzhaoshangmao	muzhaoshangmao
97	ebay.com/usr/mx13-20	mx13-20
98	ebay.com/usr/onlywangfei	onlywangfei
99	ebay.com/usr/orangeltd	orangeltd
100	ebay.com/usr/ouhaodingsheng7	ouhaodingsheng7
101	ebay.com/usr/panda-blossom	panda-blossom
102	ebay.com/usr/pefetown	pefetown
103	ebay.com/usr/qhf-55	qhf-55
104	ebay.com/usr/ruru4846	ruru4846
105	ebay.com/usr/shenglimaoyigongsi998	shenglimaoyigongsi998
106	ebay.com/usr/s-motor	s-motor
107	ebay.com/usr/sundonghai1122	sundonghai1122
108	ebay.com/usr/szmotor	szmotor
109	ebay.com/usr/tengshi	tengshi
110	ebay.com/usr/tianxia1600	tianxia1600
111	ebay.com/usr/topbopo	topbopo
112	ebay.com/usr/topbuild1	topbuild1
113	ebay.com/usr/topbuilding-cc	topbuilding-cc

114	ebay.com/usr/ttxiangshang_2021	ttxiangshang_2021
115	ebay.com/usr/vdt-96	vdt-96
116	ebay.com/usr/vzmotors88	vzmotors88
117	ebay.com/usr/wandelong118	wandelong118
118	ebay.com/usr/wandelong2020	wandelong2020
119	ebay.com/usr/wealthsweets	wealthsweets
120	ebay.com/usr/wefunstore19	wefunstore19
121	ebay.com/usr/weichaomaoyiyouxiangongsi	weichaomaoyiyouxiangongsi
122	ebay.com/usr/wheel_b47	wheel_b47
123	ebay.com/usr/willpo_67	willpo_67
124	ebay.com/usr/wmm0516	wmm0516
125	ebay.com/usr/wwhhwanghh9	wwhhwanghh9
126	ebay.com/usr/wyan2030	wyan2030
127	ebay.com/usr/xufayyuyngjie	xufayyuyngjie
128	ebay.com/usr/yangw-77	yangw-77
129	ebay.com/usr/yeve6180	yeve6180
130	ebay.com/usr/yibudengtian-888	yibudengtian-888
131	ebay.com/usr/yiming-888	yiming-888
132	ebay.com/usr/yiqiongmaoyi	yiqiongmaoyi
133	ebay.com/usr/yiyang-226	yiyang-226
134	ebay.com/usr/yunyichuang	yunyichuang
135	ebay.com/usr/yxshop	yxshop
136	ebay.com/usr/zcsteam	zcsteam
137	ebay.com/usr/zhangyuanshangdian	zhangyuanshangdian
138	wish.com/merchant/540c0c851d2d43128a7a78d0	hehe fashion
139	wish.com/merchant/540c3274c5c246307019ded4	haisheng fashion
140	wish.com/merchant/540f0c0d7f086e0d3798bb36	tianyuanuppermarket
141	wish.com/merchant/541256b04ad3ab15860f7272	xuqingchu fashoin
142	wish.com/merchant/54152033f8abc87983772dfa	jiangkeyu fashion
143	wish.com/merchant/54183e377541ce70a0afb200	hejian fashion
144	wish.com/merchant/541d2a434ad3ab65449b31ad	yeji fashion
145	wish.com/merchant/547852411280fa3508889543	YueGuan Car Accessories
146	wish.com/merchant/549c0f29b9b7e70cbc5394e8	DP_Store

147	wish.com/merchant/55c5d758c62f3942198a1de1	Car Motorcycle Accessories Co., Ltd.
148	wish.com/merchant/561f1794bf8fe6160ed37015	kalu International company
149	wish.com/merchant/564b82870a9fda1f5fb6af4e	earvines
150	wish.com/merchant/58aeb9929dc860521d2eac5a	Richarter
151	wish.com/merchant/58b7935e3c18975a1880ff7c	Chasedreamtradeltd
152	wish.com/merchant/5902160c0d2cac110d425223	yuhai
153	wish.com/merchant/598db4f030e1f3160a8faed9	zhenyanstore
154	wish.com/merchant/59cf427db53c7f1d7fd509de	zzxuan
155	wish.com/merchant/5a38c7bf6d2c6b629b8e3d88	Molidou
156	wish.com/merchant/5aac93cc70cf6909910d9c57	HuanXiangstore
157	wish.com/merchant/5ac35fa822fad70fe8b6dd08	huzhongstore
158	wish.com/merchant/5ac5d33408a2244ca687edc7	bfdgvjerwed8453
159	wish.com/merchant/5ac618eeb125ab2e3d62310f	sea shell house
160	wish.com/merchant/5af690737824ca1e57418b8a	luqingqing17
161	wish.com/merchant/5afa8a2a8aa33d310ebd847d	wangzhongfeng
162	wish.com/merchant/5b00f2f87d4d843f7e90b5d9	eqwuioxz
163	wish.com/merchant/5b42bdbfb6723518c190f839	pan.182
164	wish.com/merchant/5b73df7ecfde147e1bbaae6d	luoshuzhen
165	wish.com/merchant/5b94e1bb1e174e285e12072f	storezhangbingbing
166	wish.com/merchant/5d4d21bd7ad24249eb1d42f6	baodanba520
167	wish.com/merchant/5d5655bde49d3c7750f21971	jingchao88
168	wish.com/merchant/5d8b49650f02885b55f3	British.absent

	741b	
169	wish.com/merchant/5d8ee7297f8b092a9317240e	moyudushang
170	wish.com/merchant/5d95710f7f8b091143c808be	henan wulin
171	wish.com/merchant/5de0ac0484f18438aebf753f	henldiflan
172	wish.com/merchant/5e44f4f149df164bbfe7c6d2	RCVB89HBJ
173	wish.com/merchant/5e626d0829e78638c0983f6e	Albert Hernandez
174	wish.com/merchant/5e63bbb0b24fc99b6d6c1edf	Roderick Daniel
175	wish.com/merchant/5e68c827c6a6e679c0bec7e1	trisha roses
176	wish.com/merchant/5e693e519145adeada972e6a	TRAC KLOU
177	wish.com/merchant/5e6cbb94eb2b334bc07647a2	LaoqiulunjiaowO
178	wish.com/merchant/5e6cf2f31061cf9c4254e7ad	OunanjiRq
179	wish.com/merchant/5e6cfa4457af09a51c60d33a	GaikanggangshugYf
180	wish.com/merchant/5e6cfb2629e7860e81df71e0	QiangjiaotangbBk
181	wish.com/merchant/5e6dd8431061cf38e954e780	RenxixianiX
182	wish.com/merchant/5e6e2c6057af09800d60d2fc	Alexanderagg
183	wish.com/merchant/5e7b25927b58822ebd009af0	panweeduey
184	wish.com/merchant/5e858655b5a908cda1de875e	dhfuiyeihr
185	wish.com/merchant/5e86d6a13338732a80716d57	hjsioasyaaplm
186	wish.com/merchant/5e86f3c48b575e887803d337	Gerald Shea
187	wish.com/merchant/5e93eaa9a93eff7b404b4c11	mcphineerf
188	wish.com/merchant/5e9591eb3b55ac310219aa4e	Liyixiao521
189	wish.com/merchant/5eff47965c9c042bd0ff00a1	aiudyqkdq

190	wish.com/merchant/5f3ca619e09a35ca8190653b	Yinyijun423
191	wish.com/merchant/5f4f5524342f2ab8525a6f14	wuyanquan865
192	wish.com/merchant/5f5ece1150f29e8afaba58bd	yjydru
193	wish.com/merchant/5f6863a77c73327af77929d7	chayouxian Store
194	wish.com/merchant/5f7bdd0ed3efdd4131162808	Custom-L2020 Club
195	wish.com/merchant/5f8919d14b99ad5c51cc6784	gaosiyang Store
196	wish.com/merchant/5fb2601b09accbf188556ff5	dsftghj34567
197	wish.com/merchant/5fb27ceda720807dedacf76e	cvbn5677fhg6
198	wish.com/merchant/5fcc5211b3d34263dcd1c888	huangniansunlo
199	wish.com/merchant/5fcc901f68d20e9690a1ad87	zhaoyuwei884
200	wish.com/merchant/5fcc99ba1b3ca3b0e53a2a4a	libingcun
201	wish.com/merchant/5fcca05e1b3ca3b7213a2b0e	Langyuanyuan
202	wish.com/merchant/5fd0c03305ef5dc878562806	niodea
203	wish.com/merchant/5fd1f11f49eb6848908a76ad	gatsonm
204	wish.com/merchant/5fd48c53e69fe878f43a5b5b	Zhoushanshan7805
205	wish.com/merchant/5fe19fdab4b85f1bccac0334	chenlei7822
206	wish.com/merchant/5ff8448842df3500425de7ea	jiangyong86512
207	wish.com/merchant/6007469318d5547162213f4d	Goldfort
208	wish.com/merchant/6056d2fda86d433d417ac70e	jihonghu29551
209	wish.com/merchant/609651f3acf3fa4d0c715563	wanganlin81289
210	wish.com/merchant/6129f0ea137f5f9a0548ec66	jiangjialing51282
211	wish.com/merchant/6132d7b3c291ea03e7b	gehengfeng53005

	bb082	
212	wish.com/merchant/613583fe172f3a7410967348	hongshenglong02034
213	wish.com/merchant/61399128d859e0fb1cae4601	zhaohongjie54781
214	wish.com/merchant/61663a06185a28877dd92576	zhouyunlong76074
215	wish.com/merchant/616923495d7de0c7c2197874	mamingchen23870
216	wish.com/merchant/616a4d4c8f85d0f01d048229	liudawnag23936
217	wish.com/merchant/616a7885db424ab133e7249d	yanghuaying24026
218	wish.com/merchant/616a8f2f25a5cc4363e752ff	yangwenle24219
219	wish.com/merchant/616bbc2c98e1dedff3360fcd	songjiangling23983
220	wish.com/merchant/617224b30df678ec87d31f8b	xiechangjin24194
221	wish.com/merchant/619b38d758ceb7d20410dd07	muyaoya22831
222	wish.com/merchant/619c640d2e0e4ae147270d4e	zhouyangya22593