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

ENTERTAINMENT ONE UK LTD.,

Plaintiff,

v.

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

Defendants.

Case No. 22-cv-01574

Judge Mary M. Rowland

Magistrate Judge Beth W. Jantz

## PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff Entertainment One UK Ltd.'s ("eOne" or "Plaintiff") Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS eOne'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 on Schedule A and 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 bearing unauthorized copies of the Peppa Pig Copyrighted Designs (including U.S. Copyright Registration Nos. VA 1-329-059, VA 1-329-056, VA 1-329-058, and VA 1-329-057) and/or using counterfeit and infringing versions of eOne's federally registered trademarks

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

(the "PEPPA PIG Trademarks") (a list of which is included in the chart below) (such products collectively referred to herein as the "Unauthorized Peppa Pig Products").

Registration	Trademark	Registration	Goods and Services
Number		Date	
_	PEPPA PIG	_	For: Computer game software and programs; DVDs, multi-media software, all featuring pre-school aged children's educational and entertainment matter, games, music, images, and animated cartoons; sunglasses in class 009;  For: Printed publications, namely, books, booklets, drawing and coloring books, magazines, activity books, all in the field of pre-school aged children's education and entertainment; stationery, notebooks and writing pads, calendars, pens, pencils and crayons, pen and pencil cases; arts and craft finger paint kits; modeling compounds; re-usable and air-drying compounds for modeling; printed instructional and teaching material in the field of pre-school aged children's education and entertainment; printed paper napkins; printed paper tablecloths and printed paper mats; printed stickers and ironon and plastic transfers; printed postcards and printed greetings cards in class 016.  For: Clothing and headgear, namely, shirts, pants, sweaters, jackets, coats, shorts, t-shirts, sweatshirts,
			sweatpants, undershirts, underwear, socks, pajamas, caps, hats, scarves,
			gloves; footwear, namely, shoes,

slippers, and athletic shoes in class 025.

For: Games, travel games, handheld games, tabletop games, activity games, and playthings, namely, board games, role playing games, chess games, card games, yo-yos, action skill games, dice games, hand held games with liquid crystal displays; electronic and non-electronic puzzles and puzzle games, hand-held, tabletop, and travel-size jigsaw puzzles; balloons; playground balls for games; dolls and toys, namely, articulated and non-articulated dolls, toy figures, modeled plastic toy figurines, bendable toys and action figures; stuffed, plush, bean-bag and cloth toys; puppets; corrugated playhouses; playing cards; rollerskates; toy scooters; scale model toy vehicles; wooden toy vehicles in class 028.

For: Entertainment in the nature stage shows for pre-school aged children; television entertainment in the nature of a series of television shows in the field of pre-school aged children's entertainment; children's entertainment and amusement centers, namely, amusement parks and play areas; production of motion picture films and radio and television programs for pre-school aged children; publication of text and graphic works of others online featuring cartoon characters in class 041.

4,872,348	PEPPA PIG	Dec. 22, 2015	For: Bleaching preparations and other
, ,			substances, namely, laundry soap,
			laundry detergent for laundry use;
			general purpose cleaning, polishing,
			and abrasive liquids and powders;
			soaps; perfumery, essential oils,
			cosmetics, hair lotions; dentifrices;
			aftershave lotions; antiperspirants;
			baby oil; baby wipes; bath gels; bath
			powder; blush; body creams, lotions
			for skin, hair, face, and baby, face
			powders; breath fresheners; bubble
			bath; eau de Cologne; deodorants for
			personal use; cosmetic powders for
			the face, hands and body; essential
			oils for personal use; eye liner; eye
			shadows; eyebrow pencils; face
			powder; face creams; facial lotions;
			face masks for cosmetic purposes;
			facial scrubs; room fragrances
			incorporating wicks; fragrances for
			personal use; hair gels; hair
			conditioners; hair shampoo; hair
			mousse; hair cream; hair spray; hand
			cream; hand lotions; soaps for the
			hand; lip balm; lipsticks; lipstick
			holders; lip gloss; liquid soaps; make-
			up; mascara; non-medicated
			mouthwash; nail care preparations;
			nail enamel; nail hardeners; nail
			polish; perfumes; potpourri; scented
			room sprays; shaving creams; skin
			soap; talcum powder; eaux de toilette;
			skin creams; skin moisturizers; sun
			block preparations; non-medicated sun
			care preparations in class 003.
			For: Materials for dressings, namely,
			gauze; medical plasters; portable filled
			medicine cases, namely, first aid kits;
			baby food; vitamins for children; herb

teas for medicinal purposes; disinfectants for hygiene purposes in class 005.

For: Tableware, namely, knives, forks and spoons; cutlery, namely, knives, forks and spoons in class 008.

For: Vehicles, namely, strollers, push bikes; bicycles and parts therefor, namely, seats, brakes, chains, handle bars; scooters; perambulators; safety seats for children for vehicles; boats, in particular rubber dinghies; trailers; vehicular balloons, namely, air balloons; boats; side cars; saddle covers for bicycles or motorcycles; tricycles; mechanical anti-theft devices for vehicles; shopping carts; electric vehicles, namely, toy cars; rims for bicycle wheels, chains, bells, baskets, handlebars, wheel hubs, dress guards, pedals, pumps, frames, tires, saddles and/or bags for bicycles; direction indicators for vehicles, in particular for bicycles, namely, wind sleeves; repair outfits for inner tubes, namely, patches; luggage racks and/or bags for vehicles, namely, for twowheeled vehicles; horns, in particular for automobiles; carts; motorcycles and mopeds; stroller covers; hub caps; tires, solid, for vehicle wheels; wheelchairs; rear view mirrors; sleighs for transport purposes; snowmobiles; fitted seat covers for vehicles; wheelbarrows; bicycle stands in class 012.

For: Precious metals and their alloys and goods of precious metals or

coated therewith, namely, boxes, charms, key rings, figures, figurines, holiday ornaments, jewellery cases, key chains, ornamental pins, ornaments of precious metal in the nature of jewelry, picture frames; jewellery, precious stones; horological and chronometric instruments; alarm clocks; bracelets; busts of precious metal; pendants; clocks; earrings; jewel cases of precious metal; jewelry chains; key rings of precious metal; lapel pins; necklaces; necktie fasteners; non-monetary coins; ornamental pins; rings; stopwatches; tie clips; tie pins; wall clocks; watch straps; watch cases; watch chains; watches; wedding bands; jewelry boxes not of metal; key fobs not of metal in class 014.

For: Animal skins, hides; trunks and travelling bags; leather shoulder belts, all-purpose carrying bags, purses, umbrellas, parasols, walking sticks; whips, harnesses and saddlery; rucksacks; luggage; luggage tags; overnight bags; change purses; satchels; tote bags; waist pouches; wallets in class 018.

For: Furniture, mirrors, picture frames; goods of wood, cork, reed, cane, wicker, horn, bone, ivory, whalebone, shell, amber, mother-of-pearl, meerschaum and substitutes for all these materials, namely, drawer pulls; air mattresses for use when camping; bassinets; beds; benches; bookcases; cabinets; chairs; coat racks; computer furniture; computer

keyboard trays; cots; couches; decorative mobiles; desks; figurines and statuettes made of bone, plaster, plastic, wax, or wood; flagpoles; footstools; hand fans; hand-held mirrors; lawn furniture; love seats; magazine racks; mattresses; non-Christmas ornaments made of bone, plaster, plastic, wax or wood; ottomans; pedestals; pillows; plant stands made of wire and metal; decorative wall plaques made of plastic or wood; plastic name badges being decorative articles; plastic novelty license plates; plastic cake decorations; sleeping bags; tables; toy boxes; umbrella stands; venetian blinds; wind chimes being decorative articles in class 020.

For: Household or kitchen utensils and containers, not of precious metal or coated therewith, namely, pots, pans, pot lids, cups; beverage glassware, goods of porcelain and earthenware, included in this class, namely, pots, pans, lids, cups; mugs, cocktail shakers, butter dishes, lunch boxes, cafetieres, ceramics for household purposes, namely, vases, drinking vessels, bowls, plates and pots, small hand-operated household and kitchen utensils and containers, not of precious metal or coated therewith, namely, skimmers, turners, strainers, graters, sieves, cookware, namely, pots and pans, corkscrews, glass kitchen jars, trays for domestic purposes, dinnerware and tableware, namely, tea services; cups and mugs, tea pots; combs and sponges for

household purposes; brushes for washing up; brush-making materials; articles for cleaning purposes, namely, sponges, cloths; steel wool; unworked or semi-worked glass, except glass used in building; all the aforesaid goods included in this class; candle snuffers of precious metal; candlesticks not of precious metal in class 021.

For: Textiles and textile goods, namely, banners, flags, coasters, labels for identifying clothing, quilts, hang tags, wall hangings; bed and plastic table covers; afghans; bath linen; blanket throws; bed canopies; bed linen; bed sheets; bed skirts; bed spreads; blanket throws; calico; children's blankets; cloth coasters; cloth doilies; cloth flags; cloth pennants; duvets; curtains; fabrics that may or may not have printed patterns and designs thereon for use in textile applications, namely, the manufacture of flags; felt pennants; golf towels; towels; handkerchiefs; hooded towels; household linen; kitchen towels; pillowcases; quilts; baby blankets; silk blankets; table linen; textile napkins; textile place mats; table napkins of textile; throws and face cloths in class 024.

For: Carpets; rugs; car floor mats; bath mats; gymnastic mats; plastic floor coverings; wall hangings, not of textile; wallpaper lined with textile in class 027.

For: Meat, fish, poultry and game; meat extracts; preserved, frozen, dried and cooked fruits and vegetables; jellies, jams, compotes; eggs; milk; milk products excluding ice cream, ice milk and frozen yogurt; edible oils and fats in class 029.

For: Coffee; tea; cocoa; sugar; rice; tapioca; sago; artificial coffee; flour and preparations made from cereals, namely, breakfast cereals, cereal bars, cereal based snack food, ready-to-eat cereals; bread; pastry; confectionery made of sugar; fruit ices; honey; treacle; yeast, baking-powder; salt; mustard; vinegar; sauces, condiments, namely, chutneys, food condiments consisting primarily of ketchup and salsa, savory sauces used as condiments; spices in class 030.

For: Beers; mineral, and aerated waters, and other non-alcoholic beverages, namely, lemonade; fruit beverages, and fruit juices; syrups for making beverages; and other preparations for making beverages, namely, fruit drinks, lemonade in class 032.

For: Product merchandising; sales promotion, for others, in particular marketing and promotion of goods and services of all kinds, including via online portals; online retail store services featuring audio, audiovisual, musical, multimedia and video content and associated merchandise in class 035.

For: telecommunication services, namely, transmission of voice, data, graphics, images, audio and video by means of broadband optical or wireless networks; providing voice chat services and chat rooms on the internet; internet provider services, namely, the leasing and arranging of access time to data networks, in particular to the internet; hotline or call center telephone services; providing press services in connection with online services, namely, the gathering, supplying and transmission of messages and information of all kinds, being online press agency services, including on-demand services and other electronic media services; providing access to the internet; telecommunications, in particular computer-aided electronic information and communication services, included in this class, for public and private users, namely, computer-aided transmission of information and images; sound, image and data transmission by cable, satellite, computer, computer network, telephone, ISDN and DSL lines; radio and television broadcasting; news and general information agencies, being press agency services, including electronic agencies, and broadcasting of television and radio programs on the World Wide Web, and broadcasting of television and radio programs by cable, satellite and other media; internet provider services; providing access to computer databases, in particular on the internet and/or intranets; providing access to

			licensed content on the internet by means of content syndication for customers; providing access to computer programs on data networks in class 038.
3,506,452	Pepa Pig	Sept. 23, 2008	For: DVDs featuring pre-school aged children's educational and entertainment matter, games, music, images, and animated cartoons in class 009.
4,783,931		Aug. 4, 2015	For: Soaps; perfumery, cosmetics, hair lotions; dentifrices; baby oil; baby wipes; bath gels; bath powder; body creams, lotions, and powders; hair conditioners; hair shampoo; hand lotions; soaps for the hand; lip balm; lip gloss; liquid soaps; non-medicated mouthwash; eaux de toilette; sun blocking preparations; non-medicated sun care preparations in class 003.  For: DVDs featuring pre-school aged children's educational and entertainment matter, games, music, images, sound recordings featuring children's educational and entertainment matter, games, music; audio recordings featuring music; video recordings featuring children's educational and entertainment matter, games, music, images, and animated cartoons; downloadable ring tones, music, mp3 files featuring music, graphics and video files featuring children's educational and entertainment matter, games, music, images, and animated cartoons, all for wireless communications devices;

computer game programs; video game software; computer game programs downloadable via the internet; computer software for children's educational and entertainment matter, games, music, images, and animated cartoons; downloadable computer programs for children's educational and entertainment matter, games, music, images, and animated cartoons; magic lanterns; sunglasses, spectacle frames; phonograph records featuring children's educational and entertainment matter, games, music in class 009.

For: Paper; cardboard; goods made from paper or cardboard, namely, books, booklets, drawing and coloring books, comic books, magazines, activity books and song books, all in the field of pre-school aged children's education and entertainment; stationery, notebooks and writing pads, calendars; photographic products, namely, photographic prints; printed matter, namely, printed paper napkins, printed paper tablecloths and printed paper mats, printed stickers and iron-on and plastic transfers printed postcards and printed greetings cards; pamphlets, books, magazines, brochures, catalogues and promotional pamphlets, all in the field of children's education and entertainment; sheet music; photographs; pictures; graphic representations; printed instructional and teaching material in the field of pre-school aged children's education and entertainment; posters; greeting

cards; postcards; picture cards; transfers and stickers; photograph albums; stationery products, namely, envelopes; artists' materials, namely, pens, pencils and crayons, pen and pencil cases; molds for modeling clays; drawing, painting and modelling goods, namely, modeling compounds; re-usable and air-drying compounds for modeling, arts and craft finger paint kits; drawing and painting implements, namely, square rulers; paintbrushes; office requisites, namely, rubber bands; printed instructional and teaching material in the field of literacy and math; diaries; calendars; bookmarks; kitchen towels of paper; paper towels; maps; address stamps; paper napkins; paper and cardboard containers; paper and cardboard pouches for packaging; paper and cardboard bags for packaging; absorbent sheets of paper for foodstuff packaging; plastic bags, film, foil for packaging in class 016.

For: Trunks and travelling bags; leather shoulder belts; all-purpose carrying, duffel, book, sports, diaper, key, school and wheeled bags; purses; umbrellas; parasols; rucksacks; luggage; luggage tags; overnight bags; change purses; satchels; tote bags; waist pouches; wallets in class 018.

For: Household or kitchen utensils, namely, pots, pans, lids for pots and pans, cups, pot and pan scrapers, household and kitchen containers; beverage glassware; goods of porcelain and earthenware, namely,

pots, pans, mugs; ceramics for household purposes, namely, vases, vessels, bowls, plates and pots; tea pots; hair brushes; candlesticks not of precious metal in class 021.

For: Textiles and textile goods, namely, coasters, labels for identifying clothing, quilts, hang tags, wall hangings; bed covers; table covers, namely, textile and plastic tablecloths; afghans; bath linen; bed, sofa and children's blankets; bed canopies; bed linen; bed sheets; bed skirts; bed spreads; blanket throws; calico; children's blankets; cloth coasters; cloth doilies; cloth flags; cloth pennants; duvets; curtains; fabric flags; felt pennants; towels; handkerchiefs; hooded towels; household linen; kitchen towels; pillowcases; quilts; baby blankets; silk blankets; table linen; textile table napkins; textile place mats; table napkins of textile; face cloths; banners and flags of textile in class 024.

For: Clothing, namely, shirts, ties, pants, sweaters, jackets, coats, shorts, t-shirts, sweatshirts, sweatpants, undershirts, underwear, socks, pajamas, belts, caps, hats, vests, scarves, gloves; footwear; headwear; leather belts in class 025.

For: Games, playthings and toys, namely, travel board games, handheld non-electronic skill games, tabletop games, travel size electronic games for the teaching of children, children's multiple activity toys, role playing

games, trivia and question and answer games played with cards and game components, chess games, card games, yo-yos, action skill games, dice games, target games, hand held unit for playing electronic games, hand held unit for playing video games, hand held games with liquid crystal displays; electronic and nonelectronic puzzles and puzzle games; hand-held, tabletop, and travel-size jigsaw puzzles; playground balls for games; dolls and toys, namely, articulated and non-articulated dolls, toy figures, modeled plastic toy figurines, bendable toys and action figures; stuffed and plush toys; toy bean bags; and cloth toys, namely, dolls; toy costume masks; puppets; corrugated playhouses; roller-skates; toy scooters; scale model toy vehicles; wooden toy vehicles; diecast toy vehicles; playing cards and card games; gymnastic and sporting articles, namely, horizontal bars; decorations for Christmas trees, except illumination articles and confectionery; action skill games; action figures and accessories therefor; board games; card games; children's multiple activity toys; badminton sets; balloons; basketballs; bath toys; baseballs; beach balls; bean bag dolls; toy building blocks; bowling balls; chess sets; Christmas stockings; collectable toy figures; crib mobiles; crib toys; tossing disc toys; dolls; doll clothing; accessories for dolls; doll playsets; electric action toys; equipment sold as a unit for playing card games; fishing tackle;

golf balls; golf gloves; golf ball markers; hand held unit for playing electronic games; hockey pucks; inflatable toys; puzzles; jump ropes; kites; magic tricks; marbles; manipulative games; mechanical toys; music box toys; musical toys; parlor games; party games; soft sculpture toys; puppets; roller skates; rubber action balls; skateboards; soccer balls; spinning tops; squeeze toys; stuffed toys; target games; teddy bears; toy action figures; toy bucket and shovel sets; toy mobiles; toy vehicles; toy scooters; toy cars; toy model hobbycraft kits; toy figures; toy banks; toy trucks; toy watches; wind up toys; yo-yos; water-wings; swimming belts; video game machines for use with external display screens or monitors only; children's play cosmetics in class 028.

For: Preparations made from cereals, namely, bread; pastry; confectionery, namely, candy; edible, flavored ices; honey; treacle in class 030.

For: Education services, namely, providing courses of instruction at the pre-school level; training services in the field of instruction at the pre-school level; entertainment in the nature of circuses and stage shows for pre-school aged children; television entertainment in the nature of a series of television shows in the field of pre-school aged children's entertainment; children's entertainment and amusement centers, namely, amusement parks and play areas;

	organizing community sporting and
	cultural events; editing and production
	of film and television, radio and
	multimedia programs; entertainment
	services, namely, providing an
	ongoing radio program for pre-school
	aged children; organizing live
	exhibitions and conferences in the
	fields of culture, sports and
	entertainment for non-business and
	non-commercial purposes;
	entertainment services in the nature of
	live musical performances; arranging
	of concerts; photography services;
	providing recreation facilities in class
	041.

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 eOne's previously granted Motion for Entry of a Temporary Restraining Order establishes that eOne has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that eOne will suffer irreparable harm if the injunction is not granted.

Specifically, eOne has proved a *prima facie* case of trademark infringement because (1) the PEPPA PIG 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 PEPPA PIG Trademarks, and (3) Defendants' use of the PEPPA PIG Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Unauthorized Peppa Pig Products with eOne. eOne has also proved a *prima facie* case of copyright infringement because it has demonstrated that (1) eOne is the owner of valid and enforceable Peppa Pig Copyrighted

Designs, and (2) Defendants, without any authorization from eOne, or any right under the law, have deliberately copied, displayed, distributed, reproduced, and/or made derivate works incorporating the Peppa Pig Copyrighted Designs on the Defendants' Online Marketplaces and the corresponding Unauthorized Peppa Pig Products. Furthermore, Defendants' continued and unauthorized use of the PEPPA PIG Trademarks and copying of the Peppa Pig Copyrighted Designs irreparably harms eOne through diminished goodwill and brand confidence, damage to eOne's reputations, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, eOne 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 PEPPA PIG 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 Peppa Pig product or not authorized by eOne to be sold in connection with the PEPPA PIG Trademarks;
  - reproducing, distributing copies of, making derivative works of, or publicly displaying
     the Peppa Pig Copyrighted Designs in any manner without the express authorization of
     eOne;
  - c. passing off, inducing, or enabling others to sell or pass off any product as a genuine Peppa Pig product or any other product produced by eOne, that is not eOne's or not

- produced under the authorization, control or supervision of eOne and approved by eOne for sale under the PEPPA PIG Trademarks and/or the Peppa Pig Copyrighted Designs;
- d. committing any acts calculated to cause consumers to believe that Unauthorized Peppa Pig Products are those sold under the authorization, control or supervision of eOne, or are sponsored by, approved by, or otherwise connected with eOne;
- e. further infringing the PEPPA PIG Trademarks and/or the Peppa Pig Copyrighted

  Designs and damaging eOne's goodwill; and
- f. 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 eOne, nor authorized by eOne to be sold or offered for sale, and which bear any of eOne's trademarks, including the PEPPA PIG Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof and/or which bear the Peppa Pig Copyrighted Designs.
- 2. Upon eOne'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 ten (10) business days after receipt of such notice, provide to eOne 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 affiliates, officers, 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 affiliates, officers, 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, Walmart, DHgate, Wish.com, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
- 3. Upon eOne'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 counterfeit and infringing goods using the PEPPA PIG Trademarks and/or which bear the Peppa Pig Copyrighted Designs.
- 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 ten (10) business 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. eOne 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 affiliates, officers, 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.

eOne 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. eOne 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

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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 3 to the Declaration of Niall Trainor [16] and the

TRO [21] 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 eOne shall remain with the Court until a Final disposition of

this case or until this Preliminary Injunction is terminated.

IT IS SO ORDERED.

DATED: May 4, 2022

Mary M. Rowland

United States District Judge

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## Entertainment One UK Ltd. v. The Partnerships and Unincorporated Associations Identified on Schedule "A" - Case No. 22-cv-1574

## **Schedule A**

	Defendant Online Marketplaces			
No	URL	Name / Seller Alias		
1	aopaisituo.en.alibaba.com	Guangzhou Offpricestocks Co., Ltd.		
2	baishida.en.alibaba.com	Dongguan Baicheng Stainless Steel Jewelry Co., Ltd.		
3	bookprinting.en.alibaba.com	Shenzhen Jinhao Color Printing Co., Ltd.		
4	cndemaxlt.en.alibaba.com	Dezhou Demax Building Decoration Material Co., Ltd.		
5	cqthjc.en.alibaba.com	Chongqing Huamulan Technology Co., Ltd.		
6	czxluck2022.en.alibaba.com	Guangzhou Yimai Trading Co., Ltd.		
7	dg-fullrich.en.alibaba.com	Dongguan Fullrich Printing Co., Ltd.		
8	dhdglobal.en.alibaba.com	Quanzhou DHD Global Trading Co., Ltd		
9	firstpromotion.en.alibaba.com	First Promotion Gifts Co., Ltd.		
10	fjguangyu.en.alibaba.com	Fujian Guangyu Bags Co., Ltd.		
11	fulinparty.en.alibaba.com	Yiwu Fuxin Trade Co., Ltd.		
12	fysc.en.alibaba.com	Fujian Fengyu Sichuang Trade Co., Ltd.		
13	fz-bison.en.alibaba.com	Fuzhou Bison Import And Export Co		
14	goldenbeartoys.en.alibaba.com	Dongguang Golden Bear Toys Co., Ltd.		
15	hbjianyun.en.alibaba.com	Hebei Jianyun Biotechnology Co., Ltd.		
16	hbningxiang.en.alibaba.com	Hebei Ning Xiang Trading Co., Ltd.		
17	hnynzy.en.alibaba.com	Huaining Yinuo Paper Co., Ltd.		
18	holiday08.en.alibaba.com	Ningbo Linyue Import & Export Co., Ltd.		
19	hunanfreeangel.en.alibaba.com	Hunan Free Angel Imp & Exp Co., Ltd.		
20	jackitchen.en.alibaba.com	Yangjiang Yeifhome Houseware Co., Limited		
21	jsleway.en.alibaba.com	Jiashan Leway Imp. & Exp. Co., Ltd.		
22	jxdhsy.en.alibaba.com	Jiangxi Daoheng Industrial Co., Ltd.		
23	lehongda.en.alibaba.com	Shenzhen Lehongda Technology Co		
24	minmin-clothes.en.alibaba.com	Guangzhou Minmin Industrial Holding Co., Ltd.		
25	nbhxcraft1.en.alibaba.com	Ningbo Haoxuan Crafts Co., Ltd.		
26	nbtenboom.en.alibaba.com	Ningbo Tengbo Intelligent Technology Co., Ltd.		
27	onecable.en.alibaba.com	Chongqing Yilan Wire And Cable Co., Ltd.		
28	phtd.en.alibaba.com	Pinghu Tengda Printing Co., Ltd.		
29	pthcchina.en.alibaba.com	Pingyang Hanchuan Household Goods Co., Ltd.		
30	qzbige.en.alibaba.com	Quanzhou Bige Trade Co., Ltd.		

31	smeballoon.en.alibaba.com	Chaozhou Simaier Trading Co., Ltd.
32	tjingchocolate.en.alibaba.com	Shenzhen Tengjing Technology Co., Ltd
33	tjpjc.en.alibaba.com	Xinji Tianjia Leather Goods Factory
34	t-shine.en.alibaba.com	Jiangsu T-shine Bakeware Co.,Ltd.
35	xiair.en.alibaba.com	Xiair International Trade (Dalian) Co., Ltd.
36	yuanyaer.en.alibaba.com	Quanzhou Yaer Electronic Commerce Co., Ltd.
		Zhengzhou Chuanshui Environmental
37	zzcs66.en.alibaba.com	Protection Technology Co., Ltd.
38	aliexpress.com/store/2130193	Shop2130193 Store
39	aliexpress.com/store/4405171	Brilliant Party Store
40	aliexpress.com/store/4648003	Global Luggage Store
41	aliexpress.com/store/4687101	Party&Birthday Rave Store
42	aliexpress.com/store/910568398	Brilliant Trip Store
43	aliexpress.com/store/912021133	Vast Boutique Toy Store
44	aliexpress.com/store/912063321	Children's City Store
45	aliexpress.com/store/912240073	Professional Dropship Store
46	aliexpress.com/store/912263549	GinWD clothes bags Store
47	aliexpress.com/store/912368038	hellowe plaything Store
48	aliexpress.com/store/2793083	CLSTROSE YU Store
49	aliexpress.com/store/4892010	7+n Store
50	aliexpress.com/store/5789749	Profession Toy Store
51	aliexpress.com/store/910323134	Yohelen Store
52	aliexpress.com/store/910830009	Shop910830009 Store
53	aliexpress.com/store/911046242	lemons toy Store
54	aliexpress.com/store/911057242	Shop911057242 Store
55	aliexpress.com/store/911190057	Shop911190057 Store
56	aliexpress.com/store/911665074	Don forget Store
57	aliexpress.com/store/911683030	YC 2022 Store
58	aliexpress.com/store/911729056	Qingzhu Handmade Art Candle Mold Store
59	aliexpress.com/store/911729088	Zhou Zhou Silicone mold crafts Store
60	aliexpress.com/store/911765342	Beixiju Store
61	aliexpress.com/store/912179425	OTTO Factory Store
62	aliexpress.com/store/912181017	Iping anmu Store
63	aliexpress.com/store/912271052	Jarden's Store
64	aliexpress.com/store/912283054	Dropship fun toy Store
65	aliexpress.com/store/912407903	A unique gift for baby Store
66	aliexpress.com/store/912417183	Toy house 33 Store
67	aliexpress.com/store/912428501	Hulu Toy World Store
68	aliexpress.com/store/912457830	Xingyuan Toy Store
69	aliexpress.com/store/912521929	Hand toy store Store
70	aliexpress.com/store/912534619	Joytoo Toy Store
71	aliexpress.com/store/912576051	WTQ Decor Store

72	aliexpress.com/store/912615213	Party Background Decoration Store
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73	aliexpress.com/store/912690748	stainlesSsteel Product Store
74	lfdzkj.en.alibaba.com	Kunshan Lanfan Electronic Technology Co., Ltd.
75	amazon.com/sp?seller=A13MRSE6OYWVBN	Lakers come on
76	amazon.com/sp?seller=A13NP3I87RF2YX	Yao-Fa
77	amazon.com/sp?seller=A142TKZVUL11SU	HXTXUS
78	amazon.com/sp?seller=A15Z4SY04HE6T5	guang zhou hui rong mao yi you xian gong si
79	amazon.com/sp?seller=A16KV836FE7XLZ	Honglei Kang
80	amazon.com/sp?seller=A16QKP0TI3B3WB	fdsjewuyt
81	amazon.com/sp?seller=A17VZJ80NJQ91G	GREAT FAMILY
82	amazon.com/sp?seller=A1CNY8MJBME7F4	Zoyin
83	amazon.com/sp?seller=A1EKVA6TFG92JM	LunShangMao-
84	amazon.com/sp?seller=A1GPASVLE8O83C	SHIN141
85	amazon.com/sp?seller=A1JAZ03TWHF19S	NDDSJPN
86	amazon.com/sp?seller=A1JBBCFT7I3TT7	guang-tuo
87	amazon.com/sp?seller=A1JEIJF14TD6BW	FADACAI
88	amazon.com/sp?seller=A1KIC3CPV4EIM	CangGhiJiuBa
89	amazon.com/sp?seller=A1M3ZSDWOR9UB6	JingJingXin
90	amazon.com/sp?seller=A1ME0JS2J7ZCYL	AIYUAN-US
91	amazon.com/sp?seller=A1NU8P5XHI1E1Y	Light Lamp Direct
92	amazon.com/sp?seller=A1QH32CR0OUBZI	supplydaily
93	amazon.com/sp?seller=A1RHP0FB00MJBT	Wei-Alligator
94	amazon.com/sp?seller=A1RKYSXMDKPB2M	Gooligoli-US
95	amazon.com/sp?seller=A1SKC292BEINSP	Setlla Yvonne
96	amazon.com/sp?seller=A1TC5LJX8L1Y0C	A1TC5LJX8L1Y0C
97	amazon.com/sp?seller=A1TLAF7OJZW1TP	ChetHaMade
98	amazon.com/sp?seller=A1V3VOC7IEPS8O	James-Bryant
99	amazon.com/sp?seller=A1V4B8EACJVY07	YuHang He
100	amazon.com/sp?seller=A1XGZBT6GBCNKW	A1XGZBT6GBCNKW
101	amazon.com/sp?seller=A206GVINI234YH	SEIS CLR-M
102	amazon.com/sp?seller=A21OV199HFZQRR	yanjiabaoi
103	amazon.com/sp?seller=A24S7AOACGCNMV	SPLENDIDLIFE
104	amazon.com/sp?seller=A24ZPQN38SH98L	guixiulindianzi
105	amazon.com/sp?seller=A256A5VNXUPX84	MEIJIA MEILIN
106	amazon.com/sp?seller=A25P27ACYMFJAS	dhfgk632
107	amazon.com/sp?seller=A26DRBH03SAA6Y	Linduo Company
108	amazon.com/sp?seller=A27R0RUWOJNC4K	sunxixi2
109	amazon.com/sp?seller=A2AOOQQ2B2OPIK	Addnk
110	amazon.com/sp?seller=A2ER1R6WR25EZL	Laideel
111	amazon.com/sp?seller=A2FZ6QBFYAQIXT	A2FZ6QBFYAQIXT
112	amazon.com/sp?seller=A2GE635I2TN15A	Zhaohui Trading Co., Ltd.

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113	amazon.com/sp?seller=A2GFTCCU0TBJF3	Arthur's Cottage
114	amazon.com/sp?seller=A2H5V108Q2H2GD	HYsmsyrUS
115	amazon.com/sp?seller=A2HL8NKQ67O2RN	Mutouzi
116	amazon.com/sp?seller=A2HUOMUL1GHD5K	Aaron lee
117	amazon.com/sp?seller=A2IW0FVKVWIBRX	luoheshiseqiangshangmaoyouxiangongsi
118	amazon.com/sp?seller=A2K7YCNTLWQ8TN	A2K7YCNTLWQ8TN
119	amazon.com/sp?seller=A2MYQPA0OVHLRL	chibishichenkaishangmaoyouxiangongsi
120	amazon.com/sp?seller=A2N8X20HRAJWCU	A2N8X20HRAJWCU
121	amazon.com/sp?seller=A2NK17O3DCJT5I	Feburary Moon
122	amazon.com/sp?seller=A2P94SDV8KU1QM	Phanshoo
123	amazon.com/sp?seller=A2SXGO4ZKWAAXL	guoxiaoying452
124	amazon.com/sp?seller=A2U7MQUC3Z0B52	Asda Global
125	amazon.com/sp?seller=A2X2DXK6OVJ1V6	Amezon Globally
126	amazon.com/sp?seller=A2YH144FH1TTID	Hongyun Li
127	amazon.com/sp?seller=A2YSK8ZQ40DDV3	kunmingtangpengdianzishangwuyouxiangongsi
128	amazon.com/sp?seller=A2Z616YO9W6ZCQ	MRMD
129	amazon.com/sp?seller=A30YEB85PW8G1N	Good Toy Seller
130	amazon.com/sp?seller=A36U9U53XKCUW7	Ivelve store
131	amazon.com/sp?seller=A37X0T3YYJEGKS	xuenaimaoyi
132	amazon.com/sp?seller=A3CJHS9KQ6WF6A	Yongqiang He
133	amazon.com/sp?seller=A3CK3DIW9PXNF5	xiangdongqukewenshangmaodian
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136	amazon.com/sp?seller=A3HJWS68QTWJCO	beijingjiyinkejiyouxiangongsi11
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139	amazon.com/sp?seller=A3JQK5YNP9NN1C	Hannah's SHop
140	amazon.com/sp?seller=A3KSDXASFTBPTU	dfgdg6
141	amazon.com/sp?seller=A3KTUQALXAEF6Y	zanxiangkun123
142	amazon.com/sp?seller=A3L4SLQA93CNE8	Yuankaili US
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144	amazon.com/sp?seller=A3T21CJYXWN645	Kokovilu
145	amazon.com/sp?seller=A3UO6JIPE8RMN2	Jia jing store
146	amazon.com/sp?seller=A3VTBWRJWX8X6Z	Wanfei Liang
147	amazon.com/sp?seller=A4G2ZPZIYUSPJ	LMMO Store
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150	amazon.com/sp?seller=A799FCEYZ75C7	Allen Brooke
151	amazon.com/sp?seller=A7EFQNHIWGKCH	pushoushangmao
152	amazon.com/sp?seller=A7YWVLCUUN6PC	Hot Mom's
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157	amazon.com/sp?seller=AGI11PX90W1VV	HARD BOYS
158	amazon.com/sp?seller=AHS7DVZNTWGKE	BZCLDuS
159	amazon.com/sp?seller=AJC0CIL3FN3DF	weikeduoliyouxiangongsi
160	amazon.com/sp?seller=AJO4IHTGCOD86	XIAOJINGSHOP-US
161	amazon.com/sp?seller=ALJMTYVY116G0	ALJMTYVY116G0
162	amazon.com/sp?seller=ARCZMIRLAZPGU	Jiaotian
163	amazon.com/sp?seller=ATUK9I9OZR70L	GOGOPARTY
164	amazon.com/sp?seller=AUSATRCCDP7QZ	New Style Life Standard
165	amazon.com/sp?seller=AV8TY0BX93XCJ	lialy Nest
166	amazon.com/sp?seller=AVWZD11W7YPVB	zhentaimaoyi1
167	amazon.com/sp?seller=AW1PO2OZWUWHO	HE JIU ZHUANGSHI
		JINGYUEGAOXINJISHUCHANYEKAIFAQUERLAN
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169	amazon.com/sp?seller=AZ6DKW9MFFHPT	XUNDIEWANGLUOKEJIYOUXIANGONGSI
170	amazon.com/sp?seller=A1468OI7XN26S4	OWENFORCE
171	amazon.com/sp?seller=A170DCJR9O82BT	Guaner Trading
172	ebay.com/usr/beautifulhomeliving-store	beautifulhomeliving-store
173	ebay.com/usr/fastgofun	fastgofun
174	ebay.com/usr/top1toy	top1toy
175	walmart.com/seller/101113314	SXQLFZP
	wish.com/merchant/5e96cc103985225636e	
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