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-02069

Judge Robert M Dow, Jr.

Magistrate Judge Heather K. McShain

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff Entertainment One UK Ltd.'s ("Plaintiff") Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS Plaintiff's Motion for Entry of a Preliminary Injunction as follows against the defendants identified in Schedule A attached hereto (collectively, the "Defendants") and using the fully interactive e-commerce stores operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (the "Seller Aliases").

This Court finds that it has personal jurisdiction over the Defendants because 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 Plaintiff's Copyrighted Designs (including U.S.

¹ The e-commerce store URLs are listed on Schedule A attached hereto.

Copyright Registration Nos. VA 1-329-059, VA 1-329-056, VA 1-329-058, and VA 1-329-057) and/or using infringing and counterfeit versions of Plaintiff's federally registered trademarks ("Plaintiff's Trademarks") to Illinois residents. Plaintiff's Trademarks are included in the chart below.

| Registration | | Registration | |
|--------------|-----------|--------------|--|
| Number | Trademark | Date | Goods and Services |
| 3,663,706 | PEPPA PIG | Aug. 4, 2009 | 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 iron-on 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 nonelectronic 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; roller-skates; 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. |
| | | | 702. |
| | | | 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; |
| | | | tot intentinal parposos, |

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 two-wheeled 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; |
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| | | | 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 | OSOTO | Sept. 23, | For: DVDs featuring pre-school aged |
| 3,300,732 | | 2008 | children's educational and entertainment |
| | P 1 P | 2000 | matter, games, music, images, and |
| | reppa'i9 | | animated cartoons in class 009. |
| | | | animated cartoons in class 009. |
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| 4,783,931 | 6.4 | Aug. 4, 2015 | For: Soaps; perfumery, cosmetics, hair |
| | (∪) | | lotions; dentifrices; baby oil; baby |
| | * | | wipes; bath gels; bath powder; body |
| | هر ا | | 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, |
| L | 1 | l | , |

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 preschool 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 preschool 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 non-electronic puzzles and puzzle games; hand-held, tabletop, and travelsize 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; rollerskates; 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 nonbusiness 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 the 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) Plaintiff's 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 Plaintiff's Trademarks, and (3) Defendants' use of Plaintiff's Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with Plaintiff. Plaintiff has also provided a prima facie case of copyright infringement because it has demonstrated that (1) Plaintiff is the owner of its valid and enforceable Copyrighted Designs, and (2) Defendants, without any authorization from Plaintiff, or any right under law, have deliberately copied, displayed, distributed, reproduced, and/or made derivative works incorporating Plaintiff's Copyrighted Designs on the Seller Aliases and the corresponding Unauthorized Products. Furthermore, Defendants' continued and unauthorized use of the Plaintiff's Trademarks and copying of its Copyrighted Designs 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. Accordingly, 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 temporarily enjoined and restrained from:
 - a. using Plaintiff's 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 Plaintiff's product or not authorized by Plaintiff to be sold in connection with Plaintiff's Trademarks;
 - b. reproducing, distributing copies of, making derivative works of, or publicly displaying Plaintiff's Copyrighted Designs in any manner without the express authorization of Plaintiff;
 - c. passing off, inducing, or enabling others to sell or pass off any product as Plaintiff's product or any other product 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 Plaintiff's Trademarks;
 - d. 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;
 - e. further infringing Plaintiff's Trademarks and/or Plaintiff's Copyrighted Designs and damaging Plaintiff'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 Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear any of Plaintiff's Trademarks,

- or any reproductions, counterfeit copies or colorable imitations thereof and/or which bear Plaintiff's Copyrighted Designs.
- 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' Seller Aliases including, without limitation, any online marketplace platforms such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), Fruugo.com ("Fruugo"), and Etsy, Inc. ("Etsy") (collectively, the "Third Party Providers') shall, within ten (10) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:
 - a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information 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 Defendants' Seller Aliases and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Seller Aliases; 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, 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 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 Plaintiff's Trademarks and/or which bear Plaintiff's Copyrighted Designs.
- 4. Defendants shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 5. Any Third Party Providers, including PayPal, eBay, Ant Financial, and Amazon Pay, shall, within ten (10) business days of receipt of this Order:
 - a. locate all accounts and funds connected to Defendants' Seller Aliases, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in 3 to the Declaration of Paul Varley, and any e-mail addresses provided for Defendants by third parties; 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 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 email 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 Defendants' Seller Aliases and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective e-commerce stores.

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 email with a link to said website to Defendants. 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 or 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. The Complaint [10] including Exhibits 1 and 2 and Schedule A [2]-[4], [10], Plaintiff's Motion for Entry of a Temporary Restraining Order, including a Temporary Injunction, a Temporary Asset Restraint, and Expedited Discovery [11] and accompanying supporting

memorandum, declarations, and exhibits, including screenshot printouts showing the Defendants' infringement of Plaintiff's Trademarks and/or Plaintiff's Copyrighted Designs [11]-[14], Plaintiff's Notice of Claims Involving Trademarks [19], Plaintiff's Notification of Affiliates [18], and the TRO [24] 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.

11. This Preliminary Injunction Order is entered at 9:00 a.m. on May 25, 2022.

Robert M. Dow, Jr.

United States District Judge

Entertainment One UK Ltd. v. The Partnerships and Unincorporated Associations Identified on Schedule "A" – Case No. 22-cv-02069

Schedule A

| No. | Seller Alias | URL |
|-----|-------------------------|---|
| 1 | DISMISSED | DISMISSED |
| 2 | DISMISSED | DISMISSED |
| 3 | DISMISSED | DISMISSED |
| 4 | DISMISSED | DISMISSED |
| 5 | DISMISSED | DISMISSED |
| 6 | DISMISSED | DISMISSED |
| | | https://www.amazon.com/sp?ie=UTF8&seller=ASDQSFJ |
| 7 | Ace Sweetheart | OUWRI0&isAmazonFulfilled=1 |
| 8 | DISMISSED | DISMISSED |
| 9 | DISMISSED | DISMISSED |
| 10 | Apt byte :) | https://www.amazon.com/sp?seller=A35Y81HJPQ68B2& |
| | | https://www.amazon.com/sp?seller=A2RSX6MFUN8ZJ0 |
| 11 | Barnette | & |
| 12 | DISMISSED | DISMISSED |
| | | https://www.amazon.com/sp?ie=UTF8&seller=AW1PO2O |
| 13 | HE JIU ZHUANGSHI | ZWUWHO |
| | | https://www.amazon.com/sp?ie=UTF8&seller=ALO5CBL |
| 14 | Jab-Switzerland | 2JLDBF&isAmazonFulfilled=1 |
| 15 | DISMISSED | DISMISSED |
| 16 | DISMISSED | DISMISSED |
| | | https://www.amazon.com/sp?ie=UTF8&seller=AP7X4GZ |
| 17 | M1: -4NO 1 | RZZ81J&isAmazonFulfilled=0&asin=B0979YV5ZP&ref_ |
| 17 | McalisterN0.1 | =olp merch name 1 |
| 18 | New Style Life Standard | https://www.amazon.com/sp?ie=UTF8&seller=AUSATRC CDP7QZ&isAmazonFulfilled=1 |
| 19 | DISMISSED | DISMISSED |
| 17 | DISWISSED | https://www.amazon.com/sp?seller=AEVS0KGN05D8W |
| 20 | Rainforest Specialties | & |
| | | https://www.amazon.com/sp?seller=A2U2WRSKPPT1DA |
| 21 | RN Decor | & |
| | | https://www.amazon.com/sp?ie=UTF8&seller=A13WS3J |
| 22 | The Best US | M2JF7F5&isAmazonFulfilled=1 |
| | | https://www.amazon.com/sp?seller=A16WETBRR6QK56 |
| 23 | TUTA | & |
| | | https://www.amazon.com/sp?ie=UTF8&seller=A1ZULRI |
| 24 | Unforgettable Party US | BCTRUTV |
| 25 | DISMISSED | DISMISSED |
| | | https://www.amazon.com/sp?ie=UTF8&seller=A1G7NFV |
| 26 | xiaeidianzishangwu | XB3E03S&isAmazonFulfilled=1 |

| 27 | DISMISSED | DISMISSED |
|----|--------------------------|---|
| 28 | DISMISSED | DISMISSED |
| | 海口市 贴廖贸易有限公 | 1 // O' LUTTEO O 11 AL DATENZA |
| 29 | 司 | https://www.amazon.com/sp?ie=UTF8&seller=ALJMTYV Y116G0 |
| 29 | PJ | |
| 30 | 维条百货 | https://www.amazon.com/sp?seller=A2K7YCNTLWQ8T N& |
| 31 | 3c-evolution | https://www.ebay.com/usr/3c-evolution |
| 32 | aria2006 | https://www.ebay.com/usr/aria2006 |
| 33 | chamitlasith-0 | https://www.ebay.com/usr/chamitlasith-0 |
| 34 | dilwath-69 | https://www.ebay.com/usr/dilwath-69 |
| 35 | dk dreamstock | https://www.ebay.com/usr/dk dreamstock |
| 36 | DISMISSED | DISMISSED |
| 37 | fun2goltd | https://www.ebay.com/usr/fun2goltd |
| 38 | gapg store | https://www.ebay.com/usr/gapg store |
| 39 | jezzamart | https://www.ebay.com/usr/jezzamart |
| 40 | kivain store | https://www.ebay.com/usr/kivain store |
| 41 | krishsl | https://www.ebay.com/usr/krishsl |
| 42 | laknaradesilva | https://www.ebay.com/usr/laknaradesilva |
| 43 | lemaiconlineshopping | https://www.ebay.com/usr/lemaiconlineshopping |
| 44 | mihiranga online store98 | https://www.ebay.com/usr/mihiranga_online_store98 |
| 45 | ni950166 | https://www.ebay.com/usr/ni950166 |
| 46 | DISMISSED | DISMISSED |
| 47 | parakramrusith 0 | https://www.ebay.com/usr/parakramrusith_0 |
| 48 | peiriscollection | https://www.ebay.com/usr/peiriscollection |
| 49 | phoebe us | https://www.ebay.com/usr/phoebe_us |
| 50 | quick_ship_store10 | https://www.ebay.com/usr/quick_ship_store10 |
| 51 | r n onlinemart | https://www.ebay.com/usr/r_n_onlinemart |
| 52 | sanquextstore | https://www.ebay.com/usr/sanquextstore |
| 53 | sheyy_22 | https://www.ebay.com/usr/sheyy_22 |
| 54 | sursi-3884 | https://www.ebay.com/usr/sursi-3884 |
| 55 | textilebestbuys | https://www.ebay.com/usr/textilebestbuys |
| 56 | thushanpeiris | https://www.ebay.com/usr/thushanpeiris |
| 57 | umar_fazal7 | https://www.ebay.com/usr/umar_fazal7 |
| 58 | vanessa_online_store | https://www.ebay.com/usr/vanessa_online_store |
| 59 | vsith_store | https://www.ebay.com/usr/vsith_store |
| 60 | DesignDigitalBoutiq | https://www.etsy.com/uk/shop/DesignDigitalBoutiq |
| 61 | digitallyprints | https://www.etsy.com/uk/shop/digitallyprints |
| 62 | EclipartcoDesign | https://www.etsy.com/uk/shop/EclipartcoDesign |
| 63 | feltdecor2014 | https://www.etsy.com/uk/shop/feltdecor2014 |
| 64 | FilokaleinHome | https://www.etsy.com/uk/shop/FilokaleinHome |
| 65 | GreenBoxConcept | https://www.etsy.com/uk/shop/GreenBoxConcept |
| 66 | haekelhexesUnikate | https://www.etsy.com/uk/shop/haekelhexesUnikate |

| 67 | JoFlock84 | https://www.etsy.com/uk/shop/JoFlock84 |
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| 68 | Kissyidea | https://www.etsy.com/uk/shop/Kissyidea |
| 69 | MASGIFTWARE | https://www.etsy.com/uk/shop/MASGIFTWARE |
| 70 | DISMISSED | DISMISSED |
| 71 | NaturalVintageeShop | https://www.etsy.com/uk/shop/NaturalVintageeShop |
| 72 | Nilv | https://www.etsy.com/uk/shop/Nilv |
| 73 | PACvideoinvitations | https://www.etsy.com/uk/shop/PACvideoinvitations |
| 74 | ProFiBra | https://www.etsy.com/uk/shop/ProFiBra |
| 75 | RobertoDesigner | https://www.etsy.com/uk/shop/RobertoDesigner |
| 76 | RobinnZapata | https://www.etsy.com/uk/shop/RobinnZapata |
| 77 | Sevillantal | https://www.etsy.com/uk/shop/Sevillantal |
| 78 | Tempodifesta | https://www.etsy.com/shop/Tempodifesta |
| 79 | VintageeTee | https://www.etsy.com/uk/shop/VintageeTee |
| 80 | WallflagsDecor | https://www.etsy.com/uk/shop/WallflagsDecor |
| 81 | wedesignbyjes | https://www.etsy.com/uk/shop/wedesignbyjes |
| | Beijing Huyikang Trading | 1 2 77 |
| 82 | Company | https://www.fruugo.us/search?merchantId=13524 |
| | Chengdunuokuomingshan | |
| 83 | gmaoyouxiangongsi | https://www.fruugo.us/search?merchantId=14044 |
| 84 | DISMISSED | DISMISSED |
| 85 | Cool Mai Technology | https://www.fruugo.us/search?merchantId=14206 |
| 86 | Dalian Jiaxu Trading | https://www.fruugo.us/search?merchantId=14189 |
| | Dongguan Dalang Lvyi | |
| 0.7 | Simulation Plant | 1,, // 6 / 10 1 /11/47 |
| 87 | Handicraft | https://www.fruugo.us/search?merchantId=14147 |
| 88 | Dongguanshengshuomaoy | 1.44 |
| 88 | iyouxiangongsi | https://www.fruugo.us/search?merchantId=13806 |
| 89 | Dongguanshibonengzidon ghuashebeiyouxiangongsi | https://www.fruugo.us/search?merchantId=14227 |
| 90 | DISMISSED | DISMISSED |
| 70 | Guangzhou HaoFeng | DIOMIOSED |
| 91 | International Trading | https://www.fruugo.us/search?merchantId=13255 |
| | Guangzhou Jiaming | |
| 92 | Trading | https://www.fruugo.us/search?merchantId=14377 |
| | Guangzhou Jiwei | • |
| 93 | Information Technology | https://www.fruugo.us/search?merchantId=14728 |
| 94 | Guangzhou Liuyu Trading | https://www.fruugo.us/search?merchantId=14477 |
| | Guangzhou Paiminsi | |
| 95 | Express | https://www.fruugo.us/search?merchantId=14531 |
| 2.5 | Guangzhou Yangtian | |
| 96 | Trading | https://www.fruugo.us/search?merchantId=14951 |
| 97 | DISMISSED | DISMISSED |

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| | Guangzhounanshaquguha | |
| 0.0 | ochadeshangmaoyouxiang | 1,, // 6 / 10 1 /1 12722 |
| 98 | ongsi | https://www.fruugo.us/search?merchantId=13723 |
| 99 | DISMISSED | DISMISSED |
| | Hangzhou Jielin | |
| 100 | Gongyinglian | 1 // 0 / 10 1 10 10 1 |
| 100 | Youxiangongsi | https://www.fruugo.us/search?merchantId=13591 |
| | Hefei Maitusilu | |
| 101 | Wangluokeji | 1 // 0 / 10 1 71 15000 |
| 101 | Youxiangongsi | https://www.fruugo.us/search?merchantId=15030 |
| 100 | Henan Changwu Hede | 1 // 0 / 10 1 31 14475 |
| 102 | Medical Equipment | https://www.fruugo.us/search?merchantId=14475 |
| | Lai Wenwen Electronic | |
| | Product Business | |
| 103 | Department | https://www.fruugo.us/search?merchantId=14359 |
| | Meizhoushixinganfengjia | |
| | nzhuzhuangshigongcheng | |
| 104 | youxiangongsi | https://www.fruugo.us/search?merchantId=13462 |
| 105 | Nantong Lunyang Trading | https://www.fruugo.us/search?merchantId=14306 |
| | Pujiang Weifeng | |
| 106 | Gongmao Youxiangongsi | https://www.fruugo.us/search?merchantId=15240 |
| | Quanzhou Dengku | |
| 107 | Electronic Technology | https://www.fruugo.us/search?merchantId=14590 |
| | Shantou Weiwei Clothing | |
| 108 | Industry | https://www.fruugo.us/search?merchantId=15038 |
| | Shanxi Tengda Network | |
| 109 | Technology | https://www.fruugo.us/search?merchantId=14879 |
| | Shen Zhen Jia Bao Feng | |
| 110 | Mei Dian Zi Shang Wu | https://www.fruugo.us/search?merchantId=14969 |
| | Shen Zhen Shi Zhi You | |
| | Yun Ke Ji You Xian Gong | |
| 111 | Si | https://www.fruugo.us/search?merchantId=14409 |
| 1 | Shenzhen Best Fitness | 1 // 0 / 10 1 71 117 |
| 112 | Management | https://www.fruugo.us/search?merchantId=14179 |
| | Shenzhen Changyun | |
| 113 | Electronics | https://www.fruugo.us/search?merchantId=13276 |
| | Shenzhen Genesis | |
| 114 | Technology | https://www.fruugo.us/search?merchantId=14595 |
| | Shenzhen Guozhifang | |
| 115 | Electronic Technology | https://www.fruugo.us/search?merchantId=14097 |
| | Shenzhen Hean Peptide | |
| 116 | Technology | https://www.fruugo.us/search?merchantId=13742 |
| | Shenzhen Huiwang | |
| 117 | Technology | https://www.fruugo.us/search?merchantId=14383 |
| | Shenzhen Katie Network | |
| 118 | Technology | https://www.fruugo.us/search?merchantId=14117 |

| | Shenzhen Kuaizhike | |
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| 119 | Technology | https://www.fruugo.us/search?merchantId=14378 |
| 117 | Shenzhen Kuyo E- | integration in the second in t |
| 120 | commerce Trading | https://www.fruugo.us/search?merchantId=14023 |
| 120 | Shenzhen Maisheng | INDENTITY OF THE PROPERTY OF T |
| 121 | Technology | https://www.fruugo.us/search?merchantId=14004 |
| | Shenzhen Naierjin | |
| 122 | Technology | https://www.fruugo.us/search?merchantId=14989 |
| | Shenzhen Pangshu | |
| 123 | Technology | https://www.fruugo.us/search?merchantId=13843 |
| | Shenzhen Qianhai | |
| | Zhengyi Supply Chain | |
| 124 | Management | https://www.fruugo.us/search?merchantId=14570 |
| | Shenzhen Xiangyuan E- | |
| 125 | commerce | https://www.fruugo.us/search?merchantId=14450 |
| 126 | Shenzhen Xihe Trading | https://www.fruugo.us/search?merchantId=14006 |
| | Shenzhen Yi Yang E- | |
| 127 | commerce | https://www.fruugo.us/search?merchantId=12682 |
| 128 | Shenzhen Yitaoju Trading | https://www.fruugo.us/search?merchantId=14645 |
| | Shenzhen Yuyuan | |
| 129 | Technology | https://www.fruugo.us/search?merchantId=14808 |
| | Shenzhen Zongshang | |
| 130 | Technology | https://www.fruugo.us/search?merchantId=14384 |
| | Shenzhenenmitewangluok | |
| 131 | ejiyouxiangongsi | https://www.fruugo.us/search?merchantId=13452 |
| | Shenzhenshi Lebaiqikeji | |
| 132 | Youxiangongsi | https://www.fruugo.us/search?merchantId=14517 |
| 122 | Shenzhenshihuairankejiyo | 1,, // 6 / 10 1 31 14700 |
| 133 | uxiangonsi | https://www.fruugo.us/search?merchantId=14702 |
| 124 | ShenzhenshiLingyoukejiy | 1,4 // 6 / 19 1 31 12520 |
| 134 | ouxiangongsi | https://www.fruugo.us/search?merchantId=13529 |
| 125 | Shenzhenshisitaboruikejiy | 1.44 |
| 135 | ouxiangongsi | https://www.fruugo.us/search?merchantId=14580 |
| 126 | Shenzhenshiyimeijiajuyou | https://www.fmugo.ug/goorgh?morghontId=12700 |
| 136 | xiangongsi | https://www.fruugo.us/search?merchantId=13799 |
| 137 | Shenzhenshizhihuiguhulia | https://www.fruugo.us/search?merchantId=13857 |
| 137 | nwang Shenzhensipakekejiyouxia | nups.//www.nuugo.us/scarcn/merchanuu-1303/ |
| 138 | | https://www.fruugo.us/search?merchantId=13097 |
| 130 | ngongsi Su Zhou Hai Heng Bo | nups.//www.nuugo.us/scarch/introhamud-1309/ |
| | Yuan Mao Yi You Xian | |
| 139 | Gongsi | https://www.fruugo.us/search?merchantId=14395 |
| 137 | Xi'an Shengchong | napon www.maago.as/souron/moronantia 17375 |
| 140 | Trading | https://www.fruugo.us/search?merchantId=15021 |
| 1 10 | Trading | https://www.maago.as/searen.merenantia 15021 |

| | Xiamen Yi Ting Nuo | |
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| 141 | Trading | https://www.fruugo.us/search?merchantId=14380 |
| | Yichangliniudianzishang | https://www.fruugo.us/search?whcat=6058&merchantId=1 |
| 142 | maoyouxiangongsi | 3878 |
| | Yiweisai (Shenzhen) | |
| 143 | Electronic | https://www.fruugo.us/search?merchantId=13521 |
| | Yiwu Hongyu Electronic | |
| 144 | Commerce | https://www.fruugo.us/search?merchantId=15082 |
| | Yiwu Yanjia Electronic | |
| 145 | Commerce | https://www.fruugo.us/search?merchantId=14876 |
| | Yiwu Yunzhi Electronic | |
| 146 | Commerce | https://www.fruugo.us/search?merchantId=15028 |
| | Yonghonghuanyujianshen | |
| 147 | tiyuyongpin | https://www.fruugo.us/search?merchantId=13923 |
| 1.10 | Zaozhuang Boqin Trading | |
| 148 | Company | https://www.fruugo.us/search?merchantId=14674 |
| 1.40 | Zhangzhou Yiye Qianfan | |
| 149 | Electronic Commerce | https://www.fruugo.us/search?merchantId=13883 |
| 1.50 | Zhongshan Orange Home | https://www.fruugo.us/search/?q=the+crow&merchantId=1 |
| 150 | Technology | 5072 |
| 151 | abctoyshop | https://www.abctoyshop.com/ |
| 152 | Orient Moon | http://www.orientmoon.com/ |
| 153 | PROCOSPLAY | https://www.procosplay.com/ |
| 154 | Rook Brand Clothing | https://rookbrand.com |
| 155 | RULESTEE | https://rulestee.com |
| 156 | smallnlight.shop | https://www.smallnlight.shop |
| 157 | SYGMall | http://www.sygmall.com |
| 158 | Trendstees | https://www.trendstees.com |
| | Dongguan Tingqiwan | |
| 159 | Trading | https://www.fruugo.us/search?merchantId=14880 |
| 160 | DISMISSED | DISMISSED |
| 161 | Moonlady | https://www.onbuy.com/gb/shop/moonlady/ |
| | Dongguan Dezhuosheng | |
| 162 | Business & Trading | https://www.fruugo.us/search?merchantId=15033 |
| | Shenzhen JiuzhouYishang | https://www.fruugo.us/search?whcat=6058&merchantId=1 |
| 163 | Technology | 4992 |
| 164 | Shenzhen Suren Luggage | https://www.fruugo.us/search?merchantId=15114 |