

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

MLB ADVANCED MEDIA, L.P. and MAJOR  
LEAGUE BASEBALL PROPERTIES, INC.,

Plaintiffs,

v.

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

Defendants.

Case No. 22-cv-02321

**Judge Robert W. Gettleman**

**Magistrate Judge Sunil H. Harjani**

**PRELIMINARY INJUNCTION ORDER AS TO CERTAIN DEFENDANTS**




THIS CAUSE being before the Court on Plaintiffs MLB Advanced Media, L.P.’s (“MLBAM”) and Major League Baseball Properties, Inc.’s (“MLBP”) (“Plaintiffs”) Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS Plaintiffs’ Motion for Entry of a Preliminary Injunction in its entirety against the fully interactive, e-commerce stores<sup>1</sup> operating under the seller aliases identified in Schedule A attached hereto (collectively, the “Seller Aliases”).

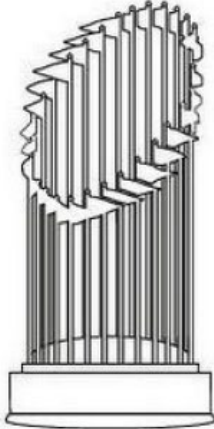
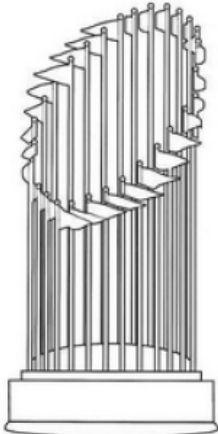
THIS COURT HEREBY FINDS that it has personal jurisdiction over the Defendants because the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce 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 using infringing and counterfeit versions of Plaintiffs’ federally

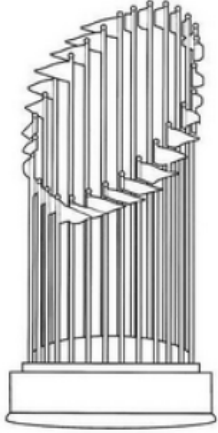
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<sup>1</sup> The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces and Domain Names.

registered trademarks (“MLB Trademarks”) to residents of Illinois. A list of the MLB Trademarks is included in the chart below.

<b>Registration Number</b>	<b>Trademark</b>	<b>Goods and Services</b>
1,620,020	MAJOR LEAGUE BASEBALL	For: clothing, namely, shirts, shorts, dresses, socks, underwear, jackets, sweaters, pants, visors, caps, bibs, infantwear, namely, baby shorts sets, romper sets, baby pants, coveralls; outerwear, namely, uniforms and pullovers, ties, robes and loungewear, sweatshirts, knitted headwear, hosiery, wristbands, robes and shoes in class 025.
2,779,958	MLB	For: clothing, namely, caps, hats, visors, knitted headwear, headbands, shirts, t-shirts, tank tops, sweaters, turtlenecks, pullovers, vests, shorts, pants, dresses, baseball uniforms, jerseys, sweatshirts, sweatpants, underwear, boxer shorts, sleepwear, jackets, cloth bibs, infantwear, rompers, coveralls, creepers, baby booties, ties, wristbands, scarves, socks, hosiery in class 025.
1,617,698		For: clothing, namely, shirts, shorts, dresses, socks, underwear, jackets, sweaters, pants, visors, caps, bibs, infantwear, namely, baby shorts sets, romper sets, baby pants, coveralls; outerwear, namely, uniforms and pullovers, ties, robes and loungewear, sweatshirts, knitted headwear, hosiery, wristbands, robes, and shoes in class 025.
2,569,970		For: jewelry, namely, bracelets, charms, earrings, rings, necklaces, pendants, watches, costume jewelry, medallions, lapel pins, tie clips, tie fasteners, cuff links, belt buckles of precious metal, money clips of precious metal, clocks, non-monetary coins of precious metal in class 014.
2,573,503		For: clothing, namely, caps, hats, visors, knitted headwear, shirts, t-shirts, tank tops, sweaters, turtlenecks, pullovers, vests, shorts, baseball uniforms, jerseys, warm-up suits, sweatshirts, sweatpants, underwear, boxer shorts, robes, sleepwear, jackets, cloth bibs, infantwear, infant diaper covers, cloth diaper sets with undershirt and diaper cover, rompers, coveralls, creepers, baby

		booties, ties, belts, wristbands, scarves, footwear, socks, slippers, aprons in class 025.
3,410,585	WORLD SERIES	For: Jewelry, namely, bracelets, earrings, pendants, watches, costume jewelry, rubber or silicone bracelets and wristbands in the nature of bracelets, medallions, ornamental metal pins, lapel pins, cuff links, money clips of precious metal, metal key chains of precious metal, metal key rings of precious metal, clocks, wall clocks, and non-monetary coins of precious metal in class 014.
5,510,999		For: Clothing, namely, headwear, shirts, sweatshirts, jackets, infant wear in class 025.
5,511,001		For: trophies of common metal in class 006.

5,511,002		For: trophies of precious metal; ornamental pins; lapel pins; rings; bracelets; charms for jewelry; non-monetary coins; clocks; key chains; key rings in class 014.
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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 Plaintiffs’ previously granted Motion for Entry of a Temporary Restraining Order establishes that Plaintiffs have demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Plaintiffs will suffer irreparable harm if the injunction is not granted. Specifically, Plaintiffs have proved a *prima facie* case of trademark infringement because (1) the MLB 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 MLB Trademarks, and (3) Defendants’ use of MLB Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants’ products with Plaintiffs. Furthermore, Defendants’ continued and unauthorized use of MLB Trademarks irreparably harms Plaintiffs through diminished goodwill and brand confidence, damage to Plaintiffs’ reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Plaintiffs have 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 MLB 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 Plaintiffs' Genuine Product or not authorized by Plaintiffs to be sold in connection with MLB Trademarks;
  - b. passing off, inducing, or enabling others to sell or pass off any product as Plaintiffs' genuine product or any other product produced by Plaintiffs, that is not Plaintiffs' or not produced under the authorization, control or supervision of Plaintiffs and approved by Plaintiffs for sale under MLB Trademarks;
  - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Plaintiffs, or are sponsored by, approved by, or otherwise connected with Plaintiffs;
  - d. further infringing MLB Trademarks and damaging Plaintiffs' 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 Plaintiffs, nor authorized by Plaintiffs to be sold or offered for sale, and which bear any of Plaintiffs' trademarks, including the MLB Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof.

2. The domain name registries for the Domain Names, including, but not limited to, VeriSign, Inc., Neustar, Inc., Afilias Limited, CentralNic, Nominet, and the Public Interest Registry, within seven (7) calendar days of receipt of this Order, shall, at Plaintiffs' choosing:
  - a. unlock and change the registrar of record for the Domain Names to a registrar of Plaintiffs' selection until further ordered by this Court; or
  - b. disable the Domain Names and make them inactive and untransferable until further ordered by this Court.
3. The domain name registrars, including, but not limited to, GoDaddy Operating Company, LLC ("GoDaddy"), Name.com, PDR LTD. d/b/a PublicDomainRegistry.com ("PDR"), and Namecheap Inc. ("Namecheap"), within seven (7) calendar days of receipt of this Order shall take any steps necessary to transfer the Domain Names to a registrar account of Plaintiffs' selection so that the Domain Names can be redirected or disabled until further ordered by this Court.
4. 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 the Defendants' Online Marketplaces and Domain Names, 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 Plaintiffs expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

- a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including, all known contact information, and all associated e-mail addresses;
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, the Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names; 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"), Walmart, DHgate, Wish.com, Amazon Pay, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
5. Upon Plaintiffs' request, those with notice of the injunction, including the Third Party Providers as defined in Paragraph 4, 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 MLB Trademarks.

6. 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.
7. Any Third Party Providers, including PayPal, eBay, Alipay, Alibaba, Ant Financial, Walmart, DHgate, Wish.com, and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:
  - a. locate all accounts and funds connected to Defendants or the Seller Aliases, Online Marketplaces and Domain Names, including, but not limited to, any financial accounts connected to the information listed in Schedule A attached 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.
8. Plaintiffs are authorized to issue expedited written discovery, pursuant to the Federal Rules of Civil Procedure 33, 34 and 36, related to:
  - a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, including any and all associated e-mail addresses; and
  - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces, the Domain Names, and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces and Domain Names.

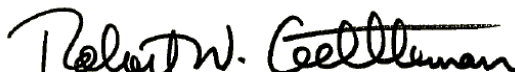


Plaintiffs are authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

9. Plaintiffs 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 to which the Domain Names which are transferred to Plaintiffs' control will redirect, or 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 or e-mail, along with any notice that Defendants receive from domain name registrars and 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.
10. 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 the Northern District of Illinois Local Rules.
11. The \$10,000 bond posted by Plaintiffs shall remain with the Court until a Final disposition of this case or until this Preliminary Injunction is terminated.

IT IS SO ORDERED

DATED: May19, 2022



Robert W. Gettleman  
United States District Judge

**MLB Advanced Media, L.P. and Major League Baseball Properties, Inc. v. The Partnerships and  
Unincorporated Associations Identified on Schedule "A"**  
**Case No. 22-cv-2321**

## Schedule A

<b>Defendant Online Marketplaces</b>		
<b>No</b>	<b>URL</b>	<b>Name / Seller Alias</b>
1	EXCEPTED	EXCEPTED
2	EXCEPTED	EXCEPTED
3	EXCEPTED	EXCEPTED
4	EXCEPTED	EXCEPTED
5	EXCEPTED	EXCEPTED
6	amazon.com/sp?seller=A1Q18ME3QC6SRB	A1Q18ME3QC6SRB
7	amazon.com/sp?seller=A10HFUOMELMZ30	Castle Fairy
8	amazon.com/sp?seller=A2TBAYY4R3GFB2	chengshidaolinshangmaoyouxiangongsi
9	amazon.com/sp?seller=A2X69SN0SZ81Z3	DAMAIPU
10	amazon.com/sp?seller=A5GCV0RM19OIJ	DOUBLE Z STORE
11	amazon.com/sp?seller=AYO4QX6N2S0YB	FLAG -Store
12	amazon.com/sp?seller=A1RZHZZ3RVESQY	gezhuodianzhishangwu
13	amazon.com/sp?seller=A13X4ZQV8EQZ0A	GongYiShiQianYiShangMaoYouXianGongSi
14	amazon.com/sp?seller=A1L6DXVQ686Z5Q	guangzhouxinhangjiayiyouxianzerengongs
15	amazon.com/sp?seller=A10B2IBI6OH8U8	Haowen NAI trading
16	amazon.com/sp?seller=A3C8UHDBCOD2N6	liuqiongfu Zhuang-shops
17	amazon.com/sp?seller=A81ENG29VDTLL	OutDoorSport-Shop
18	amazon.com/sp?seller=A3KDZHG44UY98N	OutDoorSports-Shop
19	amazon.com/sp?seller=A3KKLZIYHD3AMU	SEGGJQWEWD
20	amazon.com/sp?seller=A2PSEM03028LS	shihuiecommerce
21	amazon.com/sp?seller=A3KLGRYTKZ9AZ	Sunday-Surprise
22	amazon.com/sp?seller=A2NWIY789PCCP	TiyanoUS
23	amazon.com/sp?seller=A3E3Y3R0P30NDW	WWWuxiaobing
24	amazon.com/sp?seller=A28WW3BHI6U7IU	W-Y Store
25	amazon.com/sp?seller=A3SF62305L3CBL	xuchaohongmaoyius
26	amazon.com/sp?seller=A2KEJHU5QZY3EN	YIGE STORE
27	amazon.com/sp?seller=A893YA735CWOF	YU SEA STORE
28	amazon.com/sp?seller=AFRKN1CCWQ4JT	yuanchaohh
29	amazon.com/sp?seller=AOX52QT5A7F55	ZDKDD
30	EXCEPTED	EXCEPTED
31	EXCEPTED	EXCEPTED
32	EXCEPTED	EXCEPTED

33	ebay.com/usr/bling-tech	bling-tech
34	ebay.com/usr/canjun2013	canjun2013
35	ebay.com/usr/convert.58	convert.58
36	ebay.com/usr/djuan163	djuan163
37	ebay.com/usr/guan-6006	guan-6006
38	ebay.com/usr/guevara_1021	guevara_1021
39	ebay.com/usr/guolany57	guolany57
40	ebay.com/usr/hishn8gm	hishn8gm
41	ebay.com/usr/ifixsupplier	ifixsupplier
42	ebay.com/usr/lidaf57	lidaf57
43	ebay.com/usr/liuge696	liuge696
44	ebay.com/usr/luohhui7788	luohhui7788
45	ebay.com/usr/piece1971	piece1971
46	ebay.com/usr/premiumring2019	premiumring2019
47	ebay.com/usr/ringstore2013	ringstore2013
48	ebay.com/usr/sportsfan_lucas2014	sportsfan_lucas2014
49	ebay.com/usr/supersell6	supersell6
50	ebay.com/usr/superteknik24	superteknik24
51	ebay.com/usr/top-sz-2	top-sz-2
52	ebay.com/usr/wei.6868	wei.6868
53	ebay.com/usr/xiuyuan2016	xiuyuan2016
54	wish.com/merchant/61232d76137497c91acc9fe0	baofu222
55	wish.com/merchant/607ebc0d4402476a03107889	Dkaii
56	altendr.com	altendr.com
57	btingstores.com	btingstores.com - contact@dyiplatform.ltd
58	dhbuying.com	dhbuying.com - jornser@gmail.com
59	jerseyalbum.com	jerseyalbum.com - Secure Merchant ID CLUGYERAAD2HC
60	jerseysesupply.store	jerseysesupply.store - service24hoursonlines@gmail.com
61	livgag.com	livgag.com
62	owlesy.com	owlesy.com
63	smileprinz.com	smileprinz.com
64	tobersportusa.com	tobersportusa.com
65	wowidz.com	wowidz.com

Defendant Domain Names		
No	URL	Name / Seller Alias
66	mlbfanjersey.net	mlbfanjersey.net
67	bravesauthorize.com	bravesauthorize.com
68	mlbsalejersey.com	mlbsalejersey.com
69	fanaticsretailer.com	fanaticsretailer.com
70	authenticphilliesonline.com	authenticphilliesonline.com
71	atbravesshop.com	atbravesshop.com
72	cardinalsedge.com	cardinalsedge.com
73	cardinalsapparel.com	cardinalsapparel.com
74	dodgersonlinefans.com	dodgersonlinefans.com
75	teammetsshop.com	teammetsshop.com
76	dodgersedge.com	dodgersedge.com
77	giantsedge.com	giantsedge.com
78	metsedge.com	metsedge.com
79	ladfanshop.com	ladfanshop.com
80	mlbjersey.pro	mlbjersey.pro
81	tamakaji.com	tamakaji.com
82	redsoxteamfanstore.com	redsoxteamfanstore.com
83	avenueform.com	avenueform.com
84	mlbjersey.net	mlbjersey.net
85	mlbjerseypro.com	mlbjerseypro.com
86	lindalately.com	lindalately.com
87	newpunks.com	newpunks.com
88	galaxykevin.com	galaxykevin.com
89	cortexsportstore.com	cortexsportstore.com
90	continuitystoreusa.com	continuitystoreusa.com
91	azacube.com	azacube.com
92	adultknithat.com	adultknithat.com
93	mlbjerseysfans.com	mlbjerseysfans.com
94	acerja.club	acerja.club
95	mmfrab.top	mmfrab.top
96	mmrxob.top	mmrxob.top
97	mmrzkb.top	mmrzkb.top
98	mmqjet.xyz	mmqjet.xyz
99	mmqmet.xyz	mmqmet.xyz
100	zedkel.shop	zedkel.shop
101	mmrhrf.top	mmrhrf.top
102	mmjnwc.xyz	mmjnwc.xyz
103	mmdtpc.xyz	mmdtpc.xyz
104	mmduvc.xyz	mmduvc.xyz

105	mmyfkc.xyz	mmyfkc.xyz
106	mmdaoz.top	mmdaoz.top
107	prosperg.online	prosperg.online
108	mmpxcg.xyz	mmpxcg.xyz
109	mmzask.xyz	mmzask.xyz
110	proabe.online	proabe.online
111	mmhkve.top	mmhkve.top
112	mmygqa.xyz	mmygqa.xyz
113	mmjcmd.xyz	mmjcmd.xyz
114	ekoos.biz	ekoos.biz
115	takeoutak.com	takeoutak.com
116	mlbcap.store	mlbcap.store
117	pure-survival.com	pure-survival.com
118	flavourpirates.com	flavourpirates.com
119	pornoindirs.com	pornoindirs.com
120	mnlboxshop.com	mnlboxshop.com
121	mlbjerseys.top	mlbjerseys.top
122	garthroadbaptist.com	garthroadbaptist.com
123	ueiso.shop	ueiso.shop
124	mlbsportjersey.com	mlbsportjersey.com
125	authenticroyalsonline.com	authenticroyalsonline.com
126	authentictwinonline.com	authentictwinonline.com
127	jerseyshop.store	jerseyshop.store
128	probaten.online	probaten.online
129	mmdrun.xyz	mmdrun.xyz
130	propern.online	propern.online
131	mmjpsw.xyz	mmjpsw.xyz
132	shabeldenittis.com	shabeldenittis.com
133	3rdtvgh.com	3rdtvgh.com
134	release-o-matic.com	release-o-matic.com
135	topdogboarding.com	topdogboarding.com
136	packersprosale.com	packersprosale.com
137	outofdeepwood.com	outofdeepwood.com
138	goldengoosewomensshoes.com	goldengoosewomensshoes.com
139	daftar10.com	daftar10.com
140	six-350.com	six-350.com
141	innova237.com	innova237.com
142	qbsoln.com	qbsoln.com
143	donnareedshow.com	donnareedshow.com
144	couleurocean.com	couleurocean.com
145	joclarepr.com	joclarepr.com

146	mlbjerseysforcheapxl.com	mlbjerseysforcheapxl.com
147	cheapmlbjerseysroyals.com	cheapmlbjerseysroyals.com
148	cheapmlbjerseystigers.com	cheapmlbjerseystigers.com
149	patrick-tilley.com	patrick-tilley.com
150	cheapmlbjerseysreds.com	cheapmlbjerseysreds.com
151	thecanonicityqueenanne.com	thecanonicityqueenanne.com
152	gittx.com	gittx.com
153	mlbtwinsonline.com	mlbtwinsonline.com