

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

GENERAL MOTORS LLC,

Plaintiff,

v.

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

Defendants.

Case No. 22-cv-02476

Judge Ronald A. Guzman

Magistrate Judge Gabriel A. Fuentes

PRELIMINARY INJUNCTION ORDER AS TO CERTAIN DEFENDANTS

Plaintiff General Motors LLC (“GM” or “Plaintiff”) filed a Motion for Entry of a Preliminary Injunction against Certain Defendants identified in Schedule A attached hereto (collectively, “Defendants”) and using at least the online marketplace accounts identified in Schedule A (the “Online Marketplaces”). After reviewing the Motion and the accompanying record, this Court GRANTS GM’s Motion as follows.

This Court finds GM has provided notice to Defendants in accordance with the Temporary Restraining Order entered May 16, 2022, [23] (“TRO”), and Federal Rule of Civil Procedure 65(a)(1).

This Court also finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendants because Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, GM has provided a basis to conclude that 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, and have sold products using infringing and counterfeit versions of GM's federally registered trademarks (the "Chevrolet Trademarks") to residents of Illinois. In this case, GM has presented screenshot evidence that each Defendant e-commerce store is reaching out to do business with Illinois residents by operating one or more commercial, interactive internet stores through which Illinois residents can and do purchase products using counterfeit versions of the Chevrolet Trademarks. *See* Docket No.[15], which includes screenshot evidence confirming that each Defendant e-commerce store does stand ready, willing and able to ship its counterfeit goods to customers in Illinois bearing infringing and/or counterfeit versions of the Chevrolet Trademarks. A list of the Chevrolet Trademarks is included in the below chart.

Registration No.	Trademark	Class	Goods and Services
647,235	CHEVROLET	037	Maintenance and repair service for automotive vehicles, parts, and accessories.
1,471,518	CHEVROLET	028	Toys and playthings, namely, toy vehicles, toy cars, toy model hobbycraft kits.
1,661,627	CHEVROLET	012	Motor land vehicles, namely, automobiles, passenger vans, cargo vans, sport utility vehicles, pick-up trucks, commercial land vehicles, namely, automobiles, trucks, vans, sport utility vehicles, chassis for the foregoing and any combination thereof and structural parts therefor, engines therefor, and structural parts thereof; cabs and chassis for trucks; chassis for vans

1,667,108	CHEVROLET	042	Automobile and truck dealership services
1,708,169	CHEVROLET	016	Printed materials, namely, manuals, brochures, and catalogs pertaining to the features and controls, operation, maintenance, service and repair, and technical facts and specifications of motor vehicles
2,309,369	CHEVROLET	024	Cloth banners, cloth flags and bed blankets
2,311,214	CHEVROLET	006	Metal license plates
2,348,249	CHEVROLET	025	Shirts, sweaters, jackets, hats, clothing ties, pants and shorts
2,522,861	CHEVROLET	028	Balloons, Christmas tree ornaments, collectible toy cars, die cast vehicle models, golf bags, golf ball markers, golf balls, golf clubs, golf tees, peddle cars, coin operated pinball machines, plastic toy vehicle model hobbycraft kits, plastic toy model kit cars, radio controlled cars, coin operated video games and hand held units for playing video games
2,563,091	CHEVROLET	006	Metal money clips, metal knobs, non-mechanical metal street signs, non-mechanical metal parking signs, non-mechanical tin signs, metal key rings, metal license plates
4,195,243	CHEVROLET MYLINK	012	Electronic interface modules sold as an integral part of a motor land vehicle for wired and wireless interface of handheld electronic devices

2,469,555	CHEVROLET RACING	016	Pressure sensitive graphics, namely, decals, stickers, bumper stickers
4,321,360	CHEVROLET SPARK	012	Motor land vehicles, namely, automobiles
2,313,769	CHEVROLET USA-1	006	Metal license plates
3,506,116	CHEVROLETOR	028	Toy vehicles
2,357,128	CHEVY	016	Pressure sensitive graphics for application to automobiles and automobile dealership windows, decals, stickers, bumperstickers, calendars
2,308,986	CHEVY	025	Shirts, sweaters, jackets, hats, shorts
1,494,385	CHEVY	028	Toys and playthings; namely, toy vehicles, toy cars, toy model battery-operated remote and radio-controlled toy vehicles, friction powered toy vehicles and hobbycraft kits
2,543,117	CHEVY TRUCKS	021	Beverage glassware, bottle openers, can wraps, mugs
2,609,931	CHEVY TRUCKS	025	Clothing, namely, aprons, caps, coat, dress shirts, gloves, golf shirts, hats, jackets, polo shirts, rainwear, sunvisors, sweat shirts, t-shirts and vests
2,649,537	CHEVY TRUCKS	020	Chairs, desk ornaments made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, picture frames, plaques, plastic flags, seat cushions, stools

2,313,756	CAMARO	006	Metal license plates
2,356,823	CAMARO	025	Shirts, sweaters, jackets, blazers, hats, clothing ties, sweat suits, pants and shorts
2,654,526	CAMARO	020	Desk ornaments, made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, mirrors, non-metal money clips, picture frames, pillows, plastic flags, seat cushions, stools
3,126,223	CAMARO	012	Automobile bumpers, automotive windshield shade screens fitted covers for vehicles, vehicle seat covers
3,628,953	CAMARO	012	Motor land vehicles, namely, automobiles, engines therefor and structural parts thereof
4,246,081	CAMARO	028	Toy vehicles
4,246,082	CAMARO	009	Video game software
1,470,779	CAMARO Z-28	028	Toys and playthings, namely, toy vehicles, toy cars, toy model hobbycraft kits
4,646,598	CANYON	012	Motor land vehicles, namely, trucks
5,046,433	CANYON NIGHTFALL EDITION	012	Motor vehicles parts and accessories, namely, option package for black motor vehicles comprised of a black grille, black 5-inch assist steps, 18-inch aluminum wheels, polished exhaust tips,





			spray-in bedliner, remote start and automatic climate control, sold as a unit
2,311,794	CHEVELLE	006	Metal license plates
4,431,312	CHEVELLE	012	Exterior badges for vehicles
4,431,313	CHEVELLE	025	Clothing, namely, t-shirts, hats, sweatshirts
4,431,314	CHEVELLE	028	Toy vehicles
4,431,315	CHEVELLE	027	Floor mats for vehicles
4,646,599	COLORADO	012	Motor land vehicles, namely, trucks
5,350,973	COMMERCIAL LINK	009	Software application which allows subscribers to obtain vehicle information
5,138,021	COOL SHIELD	002	Corrosion-inhibiting coating sold as a component ingredient of brake rotors for land vehicles
3,970,828	COPO	012	Automobile engines and structural parts
4,151,421	COPO	012	Automobiles
5,726,814	COPO	025	Shirts and short-sleeved shirts, polo shirts, sweat shirts, jackets, baseball caps and hats, beanies
1,467,522	CORVETTE	028	Toys and playthings, namely, toy vehicles, toy cars, toy model hobbycraft kits
1,494,171	CORVETTE	014	Jewelry; namely, quartz watches
1,494,980	CORVETTE	009	Eyeglasses
1,495,033	CORVETTE	012	Motor vehicles; namely, automobiles, engines therefor, and structural parts thereof
1,792,602	CORVETTE	016	Printed materials; namely, manuals, brochures, and







			catalogs pertaining to the features and controls, operation, maintenance, service and repair, and technical facts and specifications of motor vehicles
2,311,215	CORVETTE	006	Metal license plates
2,314,485	CORVETTE	025	Shirts, sweaters, jackets, blazers, hats, clothing ties, sweat suits and shorts
2,463,898	CORVETTE	006	Metal money clips, metal gear shift knobs, non-mechanical metal street signs, non-mechanical metal parking signs, non-mechanical tin signs, metal key rings, metal license plates
3,147,782	CORVETTE C6	025	Clothing, namely, shirts, sweatshirts and t-shirts
4,150,438	CORVETTE GRAND SPORT	012	Motor land vehicles, namely, automobiles
5,643,759	CRUZE PREMIER	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,382,628	EL CAMINO	012	Upholstery for motor land vehicles; exterior and interior badges for motor land vehicles
2,854,854	EQUINOX	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
2,757,501	EXPRESS ACCESS	012	Motor land vehicles, namely, vans, engines therefor, and structural parts thereof
2,308,987	GENUINE CHEVROLET	006	Metal license plates





2,538,435	GENUINE CHEVROLET	021	Beverage glassware, can wraps, coasters, coolers, cups, mugs
2,678,108	GENUINE CHEVROLET	009	Computer mouse pads, neon signs; thermometers not for medical use
4,444,192	HIGH COUNTRY	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks and vans
661,322	IMPALA	012	Automobiles
2,311,798	IMPALA	006	Metal license plates
2,669,222	IMPALA	020	Chairs, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, picture frames, plastic flags, stools
4,275,949	L88	016	Decals
4,275,878	L88	012	Exterior and interior badges for motor land vehicles
4,382,776	LT-1	016	Decals
4,713,011	LT1	012	Engines for automobiles, sport utility vehicles, trucks and vans
2,092,090	MALIBU	012	Motor vehicles, namely, automobiles, engines therefor and structural parts thereof
2,663,321	MALIBU	020	Desk ornaments made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, nonmetal key tags, non-metal license plates, mirrors, non-metal money clips, picture frames, seat cushions and stools



5,675,518	MALIBU PREMIER	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
2,430,738	MONTE CARLO	006	Metal license plates
2,681,174	MONTE CARLO	020	Non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, plaques
2,637,279	ROADRESPONSE	012	Struts and shock absorbers for land motor vehicle suspensions
1,039,220	SILVERADO	012	Motor vehicles; namely, trucks
1,519,946	STINGRAY	028	Toys and playthings; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, and toy model hobbycraft kits
1,750,042	STINGRAY	012	Nameplates for motor land vehicles
4,436,811	STINGRAY	012	Motor land vehicles, namely, automobiles
1,490,090	SUBURBAN	012	Motor vehicles, namely, trucks, engines thereof and structural parts therefor
2,652,035	SUBURBAN	020	Chairs, desk ornaments made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, plastic flags, seat cushions





1,880,529	TAHOE	012	Motor vehicles, namely trucks, engines therefor, and structural parts thereof
2,652,036	TAHOE	020	Chairs, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, plastic flags, seat cushions
3,537,570	TRAVERSE	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,704,309	TRAX	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,275,899	TURBO-FIRE	016	Decals
4,275,896	TURBO-JET	012	Exterior and interior badges for motor land vehicles
4,275,897	TURBO-JET	016	Decals
2,316,536	Z/28	025	Shirts, Jackets, Hats
2,538,434	Z06	025	Clothing, namely, caps, coats, dress shirts, golf shirts, hats, jackets, polo shirts, sunvisors, sweat shirts, sweaters, t-shirts
2,008,406	Z71	012	Modified off road chassis sold as components of trucks
2,308,988	Z71	025	Shirts, jackets, hats
2,654,527	Z71	020	Chairs, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags,



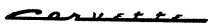

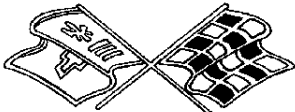
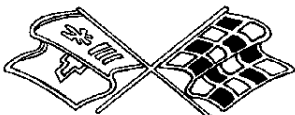
			non-metal license plates, plastic flags
5,027,847	Z71 TRAIL BOSS	012	Passenger vehicles, namely, light duty pickup trucks
4,279,992	ZR2	016	Decals
5,566,056	ZR2	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,172,493	ZL1	012	Motor land vehicles, namely, automobiles
4,117,179	ZL1	007	Automotive engine blocks
216,070	CHEVROLET	012	Automobiles
1,540,658		028	Toys and playthings; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, friction-powered toy vehicles, and toy model hobbycraft kits
647,236		037	Maintenance and repair service for automotive vehicles, parts, and accessories
2,311,397		025	Shirts, jackets, hats, clothing ties and shorts
2,563,092		006	Metal money clips, metal knobs, non-mechanical metal street signs, non-mechanical metal parking signs, non-mechanical tin signs, metal key rings, metal license plates




2,678,153		020	Non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, non-metal money clips, stools
1,540,884		037	Maintenance and repair services for motor vehicles, parts and accessories
2,311,791		006	Metal license plates
2,311,792		025	Shirts, sweaters, jackets, blazers, hats, clothing ties, sweat suits, pants and shorts
2,311,918		024	Cloth banners, cloth flags, and bed blankets
2,538,436		021	Beverage glassware, bottle openers, can wraps, coasters, commemorative plates, coolers, corkscrews, cups, glass canisters, ice scrapers with brushes, mugs, ornament replicas of vehicles made of glass, crystal and ceramic,








			portable containers, salt and pepper shakers, service trays, squeeze bottles and steins
2,550,170		028	Balloons, Christmas tree ornaments, collectible toy cars, diecast vehicle models, golf balls, peddle cars, pinball machines, plastic vehicle kits, plastic vehicle models, radio controlled cars
2,562,025		014	Belt buckles, charms, clocks, coins, cuff-links, earrings, lapel pins, money clips, pendants, rings, watches
2,578,898		025	Aprons, gloves, headbands, rainwear, robes, scarves, sleepwear, slippers, socks, sunvisors, sweaters, and vests
2,734,714		009	Binoculars; calculators; photographic cameras; directional compasses; computer mouse pads; computer mice; computer game software for use in arcade games, hand held electronic games and video games; computer screen saver software; electric signs; eyeglass cases; eyeglasses; computer and video game cartridges; video game interactive hand held remote controls for playing electronics games; hand held joy stick units for playing









			video games; graduated rulers; interactive video games of virtual reality comprised of computer software and hardware; decorative magnets; magnifying glasses; neon signs; prerecorded videotapes featuring information on automobiles; radio antennas; radios; sunglasses; tape measures; telephones; thermometers not for medical use; tire pressure gauges; video rewinders; yard sticks
2,736,654		020	Badge holders made of plastic, chairs, desk ornaments made of bone, ivory, plaster, plastic, wax and wood, non-metal jewelry boxes, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, mirrors, non-metal money clips, name badges made of plastic, name plates made of plastic, picture frames, pillows, plaques, plastic flags, seat cushions, stools
2,779,456		006	Metal banks, metal decorative boxes, ingots of common metal, metal key chains, metal key fobs, metal key rings, metal keys, license plates made of metal, non-luminous and non-mechanical metal signs, money clips made of








			metal, ornamental replicas of vehicles made of metal, non-luminous and non-mechanical parking signs made of metal, non-luminous and non-mechanical street signs made of metal, metal tool boxes
95,398		012	Automobiles, motor-vehicles, and parts thereof
1,519,942		028	Toys and play-things; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, friction-powered toy vehicles, and toy model hobbycraft kits
1,530,792		014	Clocks
1,661,628		012	Motor land vehicles;; namely, automobiles, passenger vans, cargo vans, sport utility vehicles, pick-up trucks, commercial land vehicles;; namely, automobiles, trucks, vans, sport utility vehicles, chassis for the foregoing and any combination thereof and structural parts therefor, engines therefor, and structural parts thereof; cabs and chassis for trucks; chassis for vans





1,668,924		042	Automobile and truck dealership services
2,555,071		006	Non-luminous and non-mechanical metal street signs and parking signs, metal license plates, and metal key rings
579,485		012	Automobiles
2,311,399		025	Shirts, jackets, hats, clothing ties, sweat suits
2,631,880		016	Automotive books; bank checks; bumper stickers; desktop business card holders; business cards; calendars; checkbook covers; decals; greeting cards; note pads; paperweights; pen and pencil holders; pens; pictures; playing cards; posters; lithographic prints; trading and collector cards
2,654,528		020	Chairs, desk ornaments, made of bone, ivory, plaster, wax, wood, china, crystal, glass and porcelain, jewelry boxes not of metal, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, non-metal money clips, picture frames, pillows, plaques, plastic flags, seat cushions, stools










2,750,257		020	Desk ornaments made of plastic, and wood, jewelry boxes not of metal, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal novelty license plates, non-metal money clips, picture frames, plaques
2,232,346		016	Printed materials; namely, manuals, brochures, and catalogs pertaining to the features and controls, operation, maintenance, service and repair, and technical facts and specifications of motor vehicles
2,242,877		009, 014, 016, 018, 021, 025	<p>Sunglasses, eyeglass cases and computer peripheral mouse pads</p> <p>Jewelry, namely, tie tacks, lapel pins, watches and charms</p> <p>Note pads, playing cards, posters</p> <p>Umbrellas, luggage, gym bags, leather key fobs, briefcase-type portfolios, attache cases and wallets</p> <p>Mugs, portable coolers, coasters not of paper and not being table linen and beverage glassware</p> <p>Shirts, sweaters, jackets, hats, clothing ties, sweat suits and shorts</p>









2,683,719		020	Chairs, desk ornaments, namely, ornaments of plastic or wood, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, picture frames, pillows, plaques, plastic flags, seat cushions, stools
3,739,089		009	Sunglasses, sunglass cases, computer mouse, laptop carrying cases, CD cases, neon signs
3,739,090		012	Fitted dashboard covers for vehicles, vehicle tire valve stem caps, fitted covers for vehicles, license plate frames
3,739,092		018	Wallets, duffle bags, backpacks, umbrellas, trunks
3,739,093		020	Stools
3,739,094		021	Beverage glassware, mugs, travel insulated beverage containers
3,739,096		025	Clothing, namely, t-shirts, hats, jackets, shirts, sweatshirts, coats, bandanas










3,739,097		027	Floor mats for vehicles
3,739,098		028	Toy vehicles
4,482,475		012	Motor land vehicles, namely, automobiles, engines therefor and structural parts thereof
4,597,263		028	Toy vehicles, ride-on toy vehicles, remote controlled toy vehicles
4,601,524		014	Lapel pins, watches
4,601,525		016	Posters, pens, calendars, blank journal books
4,601,526		021	Mugs, travel mugs, drinking glasses, water bottles sold empty, portable beverage coolers
4,601,527		025	Shirts, hats, jackets, coats, pullovers





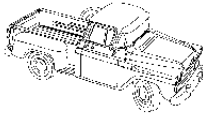

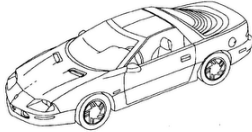
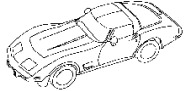
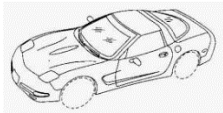
4,719,036		006	Non-luminous and non-mechanical metal signs
4,719,043		018	Duffel bags, leather credit card cases
2,545,728		025	Clothing, namely, shirts, t-shirts, jogging suits, sweat shirts, sweat pants, bandanas, sweaters, socks, hats, leather jackets, coats, ties, jackets
1,491,293		028	Toys and plaything; namely, toy vehicles, toy cars, toy model hobbycraft kits, battery-operated remote and radio-controlled toy vehicles; and friction powered toy vehicles
1,494,172		014	Jewelry; namely quartz watches and gold rings
2,311,917		025	Shirts, sweaters, jackets, blazers, hats, clothing ties, sweat suits, pants and shorts
2,545,133		016	Automotive books, bank checks, bumper stickers, business card holders, business cards, calendars, checkbook covers, children's activity books, decals, note pad holders, note pads, paperweights, pen and pencil holders, pens, photo albums, pictures, playing cards, posters, reproduction lithographic prints,

			trading and collector cards
2,578,899		025	Sleepwear, sunvisors, and vests
2,666,595		020	Chairs, desk ornaments made of bone, ivory, plaster, plastic, wax, wood, china, crystal, glass and porcelain, jewelry boxes not of metal, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, mirrors, picture frames, pillows, plaques, plastic flags, plastic storage bins, seat cushions, stools
6,190,715		012	Motor land vehicles, namely, automobiles, engines therefor and structural parts thereof
6,639,689		006, 014, 016, 018, 021, 025, 028	Non-luminous and non-mechanical metal signs Posters, pens, calendars, blank journal books Duffel bags, leather credit card cases. Mugs, travel mugs, drinking glasses, water bottles sold empty, non-electric portable beverage coolers Shirts, hats, jackets, coats, pullovers Toy vehicles, remote controlled toy vehicles

6,433,801		012	Vehicle windshields; vehicle windows
3,650,649		006	Metal holiday ornaments; sculptures made of metal
3,650,651		016	Posters, decals, pressure sensitive graphics for application to automobiles, desktop business card holders
3,650,654		021	Beverage glassware
3,650,657		022	Lanyards for holding badges and passes
4,514,976		012	Motor land vehicles, namely, automobiles
4,597,272		021	Mugs, travel mugs
4,597,273		025	Shirts, hats
4,597,275		028	Toy vehicles, ride-on toy vehicles, remote controlled toy vehicles

4,597,292		006	Non-luminous and non-mechanical metal signs
4,601,531		014	Lapel pins
4,601,532		016	Pens, posters, blank journal books
2,700,379		020	Chairs, non-metal key chain, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, stools
4,863,379		025	Clothing, namely, hats and shirts
4,863,380		014	Lapel pins
4,863,381		006	Non-luminous and non-mechanical metal signs
4,863,382		016	Posters, calendars

4,863,383		020	Decorative mirror
4,863,384		021	Stone coasters
4,863,385		024	Cloth banners
5,004,543		012	Motor land vehicles, namely, automobiles
1,506,101		028	Toys and playthings; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, friction-powered toy vehicles, and toy model hobbycraft kits
2,346,738		025	Shirts, jackets, and hats
1,898,835		012	Motor vehicles, namely automobiles, engines therefor, and structural parts thereof
2,346,737		025	Shirts, jackets, hats, pants
2,346,904		016	Stickers and calendars

2,349,761		006	Metal license plates
2,756,065		020	Non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal novelty license plates
2,721,375		020	Key fobs, key tags, key chains and key rings not made of metal; non-metal license plates
2,705,700		028	Toy vehicles
2,705,698		028	Toy vehicles
2,705,697		028	Toy vehicles
2,705,702		028	Toy vehicles
2,708,261		028	Toy vehicles
3,161,525		028	Miniature models of vehicles, toy vehicles, toy model hobby kits for the construction of toy vehicles, collectable toy cars

This Court also finds that the injunctive relief previously granted in the TRO should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of GM's previously granted Motion for Entry of a TRO establishes that GM has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that GM will suffer irreparable harm if the injunction is not granted.

Specifically, GM has proved a *prima facie* case of trademark infringement because (1) the Chevrolet Trademarks are distinctive marks and are registered with the U.S. Patent and Trademark Office on the Principal Register, (2) Defendants are not licensed or authorized to use any of the Chevrolet Trademarks, and (3) Defendants' use of the Chevrolet Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with GM. Furthermore, Defendants' continued and unauthorized use of the Chevrolet Trademarks irreparably harms GM through diminished goodwill and brand confidence, damage to GM's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, GM has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions. Accordingly, this Court orders that:

1. Defendants, their officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be preliminarily enjoined and restrained from:
 - a. using the Chevrolet Trademarks or any reproductions, counterfeit copies, or colorable imitations in any manner in connection with the distribution, marketing, advertising,

- offering for sale, or sale of any product that is not a genuine GM product or not authorized by GM to be sold in connection with the Chevrolet Trademarks;
- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine GM product or any other product produced by GM, that is not GM's or not produced under the authorization, control, or supervision of GM and approved by GM for sale under the Chevrolet Trademarks;
 - c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control, or supervision of GM, or are sponsored by, approved by, or otherwise connected with GM; and
 - d. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for GM, nor authorized by GM to be sold or offered for sale, and which bear any of GM's trademarks, including the Chevrolet Trademarks, or any reproductions, counterfeit copies, or colorable imitations.
2. Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.
 3. Upon GM's request, Defendants and any third party with actual notice of this Order who is providing services for any of 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., ContextLogic Inc. d/b/a Wish.com ("Wish.com"), and DHgate (collectively, the "Third Party Providers"), shall, within

seven (7) calendar days after receipt of such notice, provide to GM expedited discovery, limited to copies of documents and records in such person's or entity's possession or control sufficient to determine:

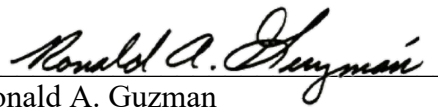
- a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including all known contact information and all associated e-mail addresses;
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services, and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and
 - c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active 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"), Alipay, Wish.com, Alibaba, Ant Financial Services Group ("Ant Financial"), Amazon Pay, eBay, and DHgate or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
4. Upon GM's request, those with notice of this Order, including the Third Party Providers as defined in Paragraph 3, shall within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants

in connection with the sale of counterfeit and infringing goods using the Chevrolet Trademarks.

5. Any Third Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, eBay, DHgate, and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:
 - a. locate all accounts and funds connected to Defendants' seller aliases, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in Exhibit 2 to the Declaration of Andrea Ankawi, 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 order by this Court.
6. GM may provide notice of the proceedings in this case 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 Pleadings, this Order, and other relevant documents on a website and by sending an e-mail with a link to said website to the e-mail addresses provided for Defendants by third parties. 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.

7. 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. Any third party impacted by this Order may move for appropriate relief.
8. The \$10,000 bond posted by GM shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

SO ORDERED:



Ronald A. Guzman
United States District Judge

Dated: 6/1/2022

**General Motors LLC v. The Partnerships and Unincorporated Associations Identified on Schedule "A" -
Case No. 22-cv-02476**

Schedule A

Defendant Online Marketplaces		
No	URL	Name / Seller Alias
1	EXCEPTED	EXCEPTED
2	EXCEPTED	EXCEPTED
3	EXCEPTED	EXCEPTED
4	EXCEPTED	EXCEPTED
5	EXCEPTED	EXCEPTED
6	EXCEPTED	EXCEPTED
7	EXCEPTED	EXCEPTED
8	EXCEPTED	EXCEPTED
9	EXCEPTED	EXCEPTED
10	EXCEPTED	EXCEPTED
11	EXCEPTED	EXCEPTED
12	EXCEPTED	EXCEPTED
13	EXCEPTED	EXCEPTED
14	EXCEPTED	EXCEPTED
15	EXCEPTED	EXCEPTED
16	EXCEPTED	EXCEPTED
17	EXCEPTED	EXCEPTED
18	EXCEPTED	EXCEPTED
19	EXCEPTED	EXCEPTED
20	EXCEPTED	EXCEPTED
21	amazon.com/sp?seller=A124A8GO9OSRN7	rongtie123
22	amazon.com/sp?seller=A12ERYYG99EQAQ	A12ERYYG99EQAQ
23	amazon.com/sp?seller=A14RFL4TZ7BE8R	LASKENPER
24	amazon.com/sp?seller=A15OEGFSFJUB9B	hejishangjoy
25	amazon.com/sp?seller=A18IE1ABTKXGR6	guanliang6
26	amazon.com/sp?seller=A1B7JWXGWN7AFZ	Wonderful Flag Store
27	amazon.com/sp?seller=A1C4HTYYU2JBYI	PPOOG FLAG
28	amazon.com/sp?seller=A1CHNMZM7M7B1R	zhubowen11
29	amazon.com/sp?seller=A1H1TICI7PP12R	XiaojingStore
30	amazon.com/sp?seller=A1I02T50Y1OYAR	guangzhoujiehanwangluokejiyouxiangongsi
31	amazon.com/sp?seller=A1JDEU0X9Z7ABM	hjahe
32	amazon.com/sp?seller=A1JERF3HL77K48	ZK-home
33	amazon.com/sp?seller=A1MP64QMUKTCNS	Franderik

34	amazon.com/sp?seller=A1OSNU9MDVSGAT	qinhuangdaohaoxinkejiyouxiangongsi
35	amazon.com/sp?seller=A1PCOHM48OLWVA	Sonow
36	amazon.com/sp?seller=A1QITOPHEFIURC	Mountfly
37	amazon.com/sp?seller=A1UC2Z57KA4RT1	A1UC2Z57KA4RT1
38	amazon.com/sp?seller=A1UJBM7WYUXRHF	XiXuanshop
39	amazon.com/sp?seller=A1WXFVEN98O00N	qinhuangdaopengcaiyouxiangongsi
40	amazon.com/sp?seller=A1Z2YF0CJOXZLF	yanchengshifengyixinshangmaoyouxiangongsi
41	amazon.com/sp?seller=A1ZPTY6CSH8FXH	Auto Parts Factory Store
42	amazon.com/sp?seller=A21GHAJRK64CQM	BERCYA
43	amazon.com/sp?seller=A23R14CIU0N6LU	LSPstore
44	amazon.com/sp?seller=A26RXR42LI4V60	belilser
45	amazon.com/sp?seller=A2BFB7RQ6T7L5Z	GRAB-A-DRESS
46	amazon.com/sp?seller=A2C5TWTCESH2ZW	lijinqistore
47	amazon.com/sp?seller=A2CQWWING0FHJJ	CaJoUS
48	amazon.com/sp?seller=A2DHIDK10Q3NBO	Emei-NA
49	amazon.com/sp?seller=A2FMIJPO454BVD	shijiazhuangluonieshangmaoyouxiangongsi
50	amazon.com/sp?seller=A2HAWP1AJF56E2	guowokoudianzishangwu
51	amazon.com/sp?seller=A2I6A4QFHL2A79	dengzhoushiyueyetubaihuoshanghang
52	amazon.com/sp?seller=A2IWHXL0ZH7EWX	auto4racing2
53	amazon.com/sp?seller=A2JLARE59L14LL	JDM Racing Online
54	amazon.com/sp?seller=A2KY92LPT93DC3	Qihua Technology Co., Ltd.
55	amazon.com/sp?seller=A2KYI6TOD1PBH5	DGFSTM
56	amazon.com/sp?seller=A2N21HPMBBKJMR	DRAWOR-Direct
57	amazon.com/sp?seller=A2NIGAQNKYBSW5	UK mian
58	amazon.com/sp?seller=A2ORRYFCMVH9FG	AUTOKOLA
59	amazon.com/sp?seller=A2SDVYCXYDAYHPO	BAISAN
60	amazon.com/sp?seller=A2SHUK2NMSUKXI	ANDONGNIO
61	amazon.com/sp?seller=A2U6CROLLKCJHS	ZLJIA AUTO
62	amazon.com/sp?seller=A2UD2LQ6JQ1132	OnlyYou.X
63	amazon.com/sp?seller=A2UMJE2Y8F4GYM	Biyrly
64	amazon.com/sp?seller=A2WI1LRVUNVUFI	jinshan689
65	amazon.com/sp?seller=A2X60U3V03YJ4O	87Shop
66	amazon.com/sp?seller=A2YHXY1K8LJ79H	A2YHXY1K8LJ79H
67	amazon.com/sp?seller=A2ZYRX6VZ3FHA0	BABCAR
68	amazon.com/sp?seller=A307O7ZT7WKMFD	haoren2-Home
69	amazon.com/sp?seller=A30D468563Q1HH	GuoJiacheng Art
70	amazon.com/sp?seller=A31S43HPRLA035	ROCCS(Authorized Dealer)
71	amazon.com/sp?seller=A35SE8JOOX006W	BIG DRAGON PROPERTIES LIMITED5
72	amazon.com/sp?seller=A35VZAF1FWHZ4X	LEIZIMAOYI
73	amazon.com/sp?seller=A3609H96Q1VIGP	Zqlc Lcc
74	amazon.com/sp?seller=A36K99O3OHUS6W	AUTO HOTSEN
75	amazon.com/sp?seller=A373APLZFJS6T6	Maoyi-vc

76	amazon.com/sp?seller=A37YHMXOKYH80	PUMERY
77	amazon.com/sp?seller=A39IXBIR4G7JI1	WANGJINJI
78	amazon.com/sp?seller=A3A999MZDUFIDE	zlnida
79	amazon.com/sp?seller=A3AVK8V179092J	Liu Yang's Store
80	amazon.com/sp?seller=A3AZ2J27BI9OOA	carmonmon
81	amazon.com/sp?seller=A3BM953OOTR0H1	YIBECAR Tech
82	amazon.com/sp?seller=A3E057T2J4EWS2	Obstoni
83	amazon.com/sp?seller=A3FCPXUJLTVAZH	nanoha2005
84	amazon.com/sp?seller=A3HES03OVPK34N	WXDLI
85	amazon.com/sp?seller=A3N02X9ELD0VCV	Vintage blueprint poster store
86	amazon.com/sp?seller=A3NE93U34A5B5O	Mingtinart
87	amazon.com/sp?seller=A3O5NL8CZNIXRE	pengjinyan
88	amazon.com/sp?seller=A3RJEJCT65M0YO	HNZVWH
89	amazon.com/sp?seller=A3RO4KXFIV0KI1	Dimike
90	amazon.com/sp?seller=A3RQYGH645JE3L	BESHGB
91	amazon.com/sp?seller=A3V9CGGKNVV4FY	MHHDAL
92	amazon.com/sp?seller=A56Z3KZLCUIHA	GAMERIEND-US
93	amazon.com/sp?seller=A58P5WGECJBIK	MUTA0PUS
94	amazon.com/sp?seller=A5ILTCE8P2L1B	shangshuixianzhanyanshangmaoyouxiangongsi
95	amazon.com/sp?seller=A6P5BQS7JPGIK	AYJDHX
96	amazon.com/sp?seller=ABB2F5YSJAYJG	Wiwwivoi
97	amazon.com/sp?seller=AGPB23FDCQ64E	Commonasme
98	amazon.com/sp?seller=AIBQKVRWJ6MN	GFFTEO
99	amazon.com/sp?seller=AIYC3NYAV8VT8	guangxiyanshatouziyouxiangongsi
100	amazon.com/sp?seller=AIZF1GC966NH5	HuaZo
101	amazon.com/sp?seller=AKB20K4JGCGPB	MXAUTO Store
102	amazon.com/sp?seller=AKUA8SSUJWR3N	anything for car
103	amazon.com/sp?seller=ALVYV373F4I4W	ouhaodingsheng
104	amazon.com/sp?seller=AMHPLCX4D9ICU	BOERLKY STORE
105	amazon.com/sp?seller=AMT4XWE3RCGP1	Lan Fan
106	amazon.com/sp?seller=ANMFKWA1OOO3E	heanttv flagship store
107	amazon.com/sp?seller=ANRKTB13IGAN6	ZQDAN AUTO
108	amazon.com/sp?seller=AP0TODYRDAZQS	PetalsStoreUS
109	amazon.com/sp?seller=AP26FX2LT4WNY	chongqingjunlijidianshebeiyouxixiangongsi
110	amazon.com/sp?seller=ARTDR05PJI5B7	PDD Pet tools
111	amazon.com/sp?seller=AVH6L6I0UBV7G	Than More
112	amazon.com/sp?seller=AWOS9TBH9CWLR	ATNUWMFGIUIAE
113	amazon.com/sp?seller=AWWQY0QRS8CFS	Carb Omar
114	amazon.com/sp?seller=AZ0H3P7ZN2L19	AnnLeeKe
115	amazon.com/sp?seller=AZEJQU51HTQ2Y	Boyous
116	EXCEPTED	EXCEPTED
117	EXCEPTED	EXCEPTED

118	EXCEPTED	EXCEPTED
119	EXCEPTED	EXCEPTED
120	EXCEPTED	EXCEPTED
121	EXCEPTED	EXCEPTED
122	EXCEPTED	EXCEPTED
123	EXCEPTED	EXCEPTED
124	ebay.com/usr/aestheticism-11	aestheticism-11
125	ebay.com/usr/amazinghappy	amazinghappy
126	ebay.com/usr/autopartshomeus	autopartshomeus
127	ebay.com/usr/beautiful_boxroom2008	beautiful_boxroom2008
128	ebay.com/usr/bestyseller-v	bestyseller-v
129	ebay.com/usr/cangnanhengyu3	cangnanhengyu3
130	ebay.com/usr/chole2021	chole2021
131	ebay.com/usr/chunyan-us	chunyan-us
132	ebay.com/usr/daynight_2028	daynight_2028
133	ebay.com/usr/dg-tuning	dg-tuning
134	ebay.com/usr/dreamfactory5188	dreamfactory5188
135	ebay.com/usr/drjnlp-6	drjnlp-6
136	ebay.com/usr/earthshoptop	earthshoptop
137	ebay.com/usr/emerald1	emerald1
138	ebay.com/usr/fiee-ki	fiee-ki
139	ebay.com/usr/goodautopart	goodautopart
140	ebay.com/usr/happyleucky	happyleucky
141	ebay.com/usr/hong-5855	hong-5855
142	ebay.com/usr/idoleedole	idoleedole
143	ebay.com/usr/jametrade4	jametrade4
144	ebay.com/usr/jasleny	jasleny
145	ebay.com/usr/jksy6164	jksy6164
146	ebay.com/usr/joltio895	joltio895
147	ebay.com/usr/kakii_fernandez	kakii_fernandez
148	ebay.com/usr/kang_1994	kang_1994
149	ebay.com/usr/kingfang568	kingfang568
150	ebay.com/usr/lemonly-1	lemonly-1
151	ebay.com/usr/lerenet	lerenet
152	ebay.com/usr/lideer87	lideer87
153	ebay.com/usr/liuzhi-678	liuzhi-678
154	ebay.com/usr/meijiren9	meijiren9
155	ebay.com/usr/mimoly-6	mimoly-6
156	ebay.com/usr/motherpenny_2	motherpenny_2
157	ebay.com/usr/muellaauto	muellaauto
158	ebay.com/usr/nana-autoparts	nana-autoparts
159	ebay.com/usr/nemo_4421	nemo_4421

160	ebay.com/usr/petrichor-05	petrichor-05
161	ebay.com/usr/pleasant-goat	pleasant-goat
162	ebay.com/usr/rainesinge	rainesinge
163	ebay.com/usr/scene0207	scene0207
164	ebay.com/usr/sdghywb66	sdghywb66
165	ebay.com/usr/seboypz	seboypz
166	ebay.com/usr/sggYWvz0	sggywvz0
167	ebay.com/usr/shoptuny	shoptuny
168	ebay.com/usr/sihugpiao2	sihugpiao2
169	ebay.com/usr/sjsino99	sjsino99
170	ebay.com/usr/specialautoparts-88	specialautoparts-88
171	ebay.com/usr/sunny-store6	sunny-store6
172	ebay.com/usr/sven1667-new-parts	sven1667-new-parts
173	ebay.com/usr/syensi-motors-parts	syensi-motors-parts
174	ebay.com/usr/trmsnicer	trmsnicer
175	ebay.com/usr/truckcar	truckcar
176	ebay.com/usr/vogue1990	vogue1990
177	ebay.com/usr/wendong_20184	wendong_20184
178	ebay.com/usr/wenji4017	wenji4017
179	ebay.com/usr/wig_71	wig_71
180	ebay.com/usr/wishes50	wishes50
181	ebay.com/usr/xin-yi-44	xin-yi-44
182	ebay.com/usr/xunchi	xunchi
183	ebay.com/usr/you2er28	you2er28
184	ebay.com/usr/yusitikk-5	yusitikk-5
185	ebay.com/usr/yuyi-6	yuyi-6
186	wish.com/merchant/5405ccdf1d2d435c5430126b	junmei wholesale store
187	wish.com/merchant/540d2b2a1d2d43129f7a8285	jiyuan fashion
188	wish.com/merchant/5604b204c41c5442b1d75284	Color My Life
189	wish.com/merchant/5a1a6dd567e9be35bdf83544	wangqinxiao
190	wish.com/merchant/5afa5699fbf60d5f27d2cbaa	GUSS1999
191	wish.com/merchant/5de60633b69679cb51122089	dhiwzs9cds
192	wish.com/merchant/5e4a6004b9fc2e486d4be7ea	fangxiaoyan49
193	wish.com/merchant/5e687eed18426d536db9bb0a	jamie wright
194	wish.com/merchant/5f47ebe129e7867b9be42e4c	yondo
195	wish.com/merchant/5f59cf8d83a11f66d908b56d	cdsjhfsfsf
196	wish.com/merchant/5f5ed4e38efa7eb65d7bb50c	bndsjsuffd
197	wish.com/merchant/5f5f14d5cdd973e085754fdb	sdiouduiffcx
198	wish.com/merchant/6006a26cefe8f53b9bc898b6	vannala
199	wish.com/merchant/6068066b51409b01d839461a	sangyuanji84983