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-03208

Judge John Robert Blakey

Magistrate Judge Young B. Kim

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff General Motor LLC's ("Plaintiff" or "GM") Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS GM's Motion for Entry of a Preliminary Injunction in its entirety against the Defendants identified in Schedule A attached hereto (the "Seller Aliases").

This Court further finds that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. "In the context of cases like this one, that means a plaintiff must show that each defendant is actually operating an interactive website that is accessible in Illinois and that each defendant has aimed such site at Illinois by standing ready, willing and able to ship its [infringing] goods to customers in Illinois in particular (or otherwise has some sufficient voluntary contacts with the state)." Am. Bridal & Prom Indus. Ass'n v. P'ships & Unincorporated Ass'ns Identified on Schedule A, 192 F. Supp. 3d 924, 934 (N.D. Ill. 2016). 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 the Pontiac Trademarks to residents of Illinois (a list of which is included in the below chart). *See* [16] (Declaration of Andrea Ankawi) at ¶ 14; [17]. In addition, Plaintiff's screenshot evidence confirms that each Seller Alias does stand ready, willing and able to ship its counterfeit goods to customers in Illinois. *Id.* Moreover, several Seller Aliases have in fact shipped counterfeit goods to Illinois. *Id.*

Registration No.	Trademark	Class	Goods and Services
647,239	PONTIAC	037	Maintenance and repair service for automotive vehicles, parts, and accessories.
1,467,546	PONTIAC	028	Toys and playthings, namely; toy vehicles, toy cars, toy model hobbycraft kits.
1,701,857	PONTIAC	024	Towels.
1,704,693	PONTIAC	009	Radios.
1,708,004	PONTIAC	012	Motor vehicle accessories; namely, windshield sunshades.
1,708,037	PONTIAC	014	Watches and clocks.
1,708,167	PONTIAC	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.
1,744,568	PONTIAC	020	Key fobs not made of metal.
2,539,540	PONTIAC	020	Stools, chairs, pillows, non- metal license plates, non- metal key tags.

Registration No.	Trademark	Class	Goods and Services
2,563,775	PONTIAC	025	Clothing, namely, jackets, coats, sweat shirts, t-shirts, hats, shirts.
2,563,776	PONTIAC	018	Waist packs, duffel bags, tote bags, luggage, wallets.
2,659,488	PONTIAC	006, 018, 020, 028	Metal key chains, metal key fobs, metal key rings, metal keys for locks, license plates made of metal, non-luminous and non-mechanical metal signs, non-luminous and non-mechanical metal parking signs, non-luminous and non-mechanical metal street signs. Leather key chains. Non-metal key chains, plastic key chain tags, key fobs not of metal, non-metal key rings, plastic key rings. Miniature replicas of
2,683,733	PONTIAC	020	vehicles, and toy vehicles. 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.
2,685,227	PONTIAC	009	Magnets, thermometers not for medical use, computer game software, mouse pads, neon signs, calculators.
1,711,668	PONTIAC FIREBIRD	016	Printed materials; namely, manuals, brochures, and catalogs pertaining to the features and controls, operation, maintenance, service and repair, and

Registration No.	Trademark	Class	Goods and Services
			technical facts and specifications of motor vehicles.
1,470,780	FIREBIRD	028	Toys and playthings, namely toy vehicles, toy cars, toy model hobbycraft kits.
2,700,393	FIREBIRD	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.
2,686,610	BONNEVILLE	020	Non-metal key chains; non- metal key fobs; non-metal key holders; non-metal key rings; plastic key tags; plastic novelty license plates.
1,470,782	FIERO	028	Toys and playthings, namely, toy vehicles, toy cars, toy model hobbycraft kits.
3,329,341	FIERO	012	Automobile accessories, namely, badges for vehicle trim.
3,329,342	FIERO	016	Decals.
2,686,611	GRAND AM	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.
2,752,897	GRAND PRIX	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.
2,522,859	GTO	028	Christmas tree ornaments, collectible toy cars, die cast vehicle models, plastic toy

Registration No.	Trademark	Class	Goods and Services
			vehicle model hobbycraft kits, plastic toy model kit cars, radio controlled cars.
4,275,876	GTO	012	Upholstery for motor land vehicles; exterior and interior badges for motor land vehicles.
4,275,877	GTO	016	Decals.
2,985,088	THE JUDGE	012	Parts, restoration parts, and accessories for motor land vehicles, namely, and badges, namely, interior and exterior trim badges.
3,401,756	THE JUDGE	025	T-shirts.
4,279,990	WS6	012	Hub cap covers; exterior and interior badges for motor land vehicles.
4,279,991	WS6	016	Decals.
2,805,682	VIBE	028	Die cast toy vehicles, plastic model toy vehicles, and radio controlled toy vehicles.
1,495,970	PONTIAC	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.
1,686,331		014	Watches and clocks.

Registration No.	Trademark	Class	Goods and Services
1,697,696		024	Towels.
1,697,755		025	Clothing; namely, caps.
1,704,802		012	Automotive window sunshades.
1,708,162		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.

Registration No.	Trademark	Class	Goods and Services
1,744,567		020	Key fobs not made of metal.
2,539,542		020	Jewelry boxes not of metal, stools, chairs, non-metal license plates, non-metal key tags.
2,550,171		025	Clothing, namely, caps, coat, golf shirts, hats, jackets, polo shirts, sunvisors, sweat shirts, t-shirts.
2,555,084		009	Magnets; thermometers not for medical use; computer software for use in arcade games, handheld electronic games, video games, computer games and computer screen savers; mouse pads; neon signs.

Registration No.	Trademark	Class	Goods and Services
2,570,842		018	Wallets.
2,625,151		018	Umbrellas, wallets.
2,635,330		006, 018, 020, 028	Metal piggy banks, metal key chains, metal key fobs, metal key rings, metal keys for locks, license plates made of metal, non-luminous and non-mechanical metal signs, non-luminous and non-mechanical metal parking signs, non-luminous and non-mechanical metal street signs, metal tool boxes and freestanding. Leather key chains. Non-metal key chains, plastic key chain tags, key fobs not of metal, non-metal key rings, plastic key rings. Miniature replicas of vehicles, and toy vehicles.

Registration No.	Trademark	Class	Goods and Services
2,683,734		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.
2,563,777		016	Pressure sensitive graphics for application to automobiles and windows, decals, pens, pencils, calendars.
1,494,384		028	Toys and playthings; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, and friction powered toy vehicles.
2,734,723		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; stools.

Registration No.	Trademark	Class	Goods and Services
4,334,451		012	Exterior and interior badges for vehicles.
4,334,454		027	Floor mats for vehicles.
4,338,289		012	Wheel cover center caps; exterior and interior badges for vehicles.
4,338,290		027	Floor mats for vehicles.
4,338,292		027	Floor mats for vehicles.

Registration No.	Trademark	Class	Goods and Services
4,338,293	The state of the s	012	Wheel cover center caps.
4,338,294	The State of the S	027	Floor mats for vehicles.
1,489,529	Fiero	028	Toys and playthings, namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, and friction powered toy vehicles.
4,395,033	G T O	012	Upholstery for vehicles; exterior and interior badges for vehicles.

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order ("TRO") should remain in place through the pendency of this

litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of GM's previously granted Motion for Entry of a Temporary Restraining Order establishes that GM has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that GM will suffer irreparable harm if the injunction is not granted. Specifically, GM has demonstrated a prima facie case of trademark infringement because (1) the Pontiac 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 Pontiac Trademarks, and (3) Defendants' use of the Pontiac 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 Pontiac Trademarks irreparably harms GM through diminished goodwill and brand confidence, damage to GM's reputation, and loss of exclusivity. Monetary damages fail to address such damage and, therefore, GM has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions. As such, this Court orders that:

- 1. Defendants, their officers, agents, servants, employees, attorneys, and other persons acting in active concert or participation with them be preliminarily enjoined and restrained from:
 - a. using the Pontiac Trademarks or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Pontiac product or not authorized by GM to be sold in connection with the Pontiac Trademarks;

- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Pontiac product or any other 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 Pontiac Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of GM, or are sponsored by, approved by, or otherwise connected with GM;
- d. further infringing the Pontiac Trademarks and damaging GM's goodwill; and
- e. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for GM, nor authorized by GM to be sold or offered for sale, and which bear any of GM's trademarks, including the Pontiac Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof.
- 2. Upon GM's request, any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of Defendants' Online Marketplaces, including, without limitation, any online marketplace platforms such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), Walmart Inc. ("Walmart"), Etsy, Inc. ("Etsy"), and DHgate (collectively, the "Third Party Providers") shall, within seven (7) calendar days after receipt of such notice, provide to GM expedited discovery, limited to copies of documents and records in such person's or entity's possession or control sufficient to determine:

- a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information and all associated e-mail addresses;
- b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces; and
- c. any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Inc. ("PayPal"), eBay, Alipay, Alibaba, Ant Financial Services Group ("Ant Financial"), Amazon Pay, Wish.com, Walmart, Etsy, and DHgate, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
- 3. Upon GM's request, those with notice of the injunction, including the Third Party Providers as defined in Paragraph 2, shall within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Pontiac Trademarks.
- 4. Defendants shall not transfer or dispose of any money or other Defendants' assets in any of Defendants' financial accounts.

- 5. Any Third Party Providers, including PayPal, eBay, Alipay, Alibaba, Ant Financial, Wish.com, Walmart, Etsy, DHgate, and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:
 - a. locate all accounts and funds connected to Defendants' Seller Aliases and Online Marketplaces, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto; and
 - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
- 6. GM is authorized to issue expedited written discovery to Defendants, pursuant to Federal Rules of Civil Procedure 33, 34 and 36, related to:
 - a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, including any and all associated e-mail addresses; and
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces.

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

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7. GM may provide notice of these proceedings to Defendants, including service of process

pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a

link to the Complaint, this Order and other relevant documents on a website and by

sending an e-mail to Defendants that includes a link to said website. The Clerk of the

Court is directed to issue a single original summons in the name of "The Partnerships and

all other Defendants identified in the Complaint" that shall apply to all Defendants. The

combination of providing notice via electronic publication and e-mail, along with any

notice that Defendants receive from payment processors, shall constitute notice

reasonably calculated under all circumstances to apprise Defendants of the pendency of

the action and afford them the opportunity to present their objections.

8. Schedule A to the Complaint [2], Exhibit 2 to the Declaration of Andrea Ankawi [17],

and the TRO [23] are unsealed.

9. Any Defendant or other persons that is subject to this Order may appear and move to

dissolve or modify the Order as permitted by and in compliance with the Federal Rules of

Civil Procedure and Northern District of Illinois Local Rules.

10. The \$10,000 bond posted by GM shall remain with the Court until a Final disposition of

this case or until this Preliminary Injunction is terminated.

SO ORDERED.

Dated: July 28, 2022

Entered:

John Robert Blakey

United States District Judge

General Motors LLC v. The Partnerships and Unincorporated Associations Identified on Schedule "A" - Case No. 22-cv-03208

Schedule A

	Defendant Online Marketplaces			
No	URL	Seller Alias		
1	DISMISSED	DISMISSED		
2	centurylighting.en.alibaba.com	Yancheng Century Opti-Tech Co., Ltd.		
3	aliexpress.com/store/912262629	100% cotton tshirts Store		
4	aliexpress.com/store/5952216	A sad phone cases Store		
5	aliexpress.com/store/912495421	A365A Store		
6	aliexpress.com/store/5890075	AK115 Store		
7	aliexpress.com/store/5422133	ARNOLD SCHWARZENEGGER Store		
8	aliexpress.com/store/4791009	Asia flags Store		
9	aliexpress.com/store/911769830	Bayline-Fashion Store		
10	aliexpress.com/store/912395672	BEIJIE Store		
11	aliexpress.com/store/1100177496	CARDIY Store		
12	aliexpress.com/store/912641184	CHAMPRINT Caps Store		
13	aliexpress.com/store/1100218830	da lao Store		
14	aliexpress.com/store/911745339	DALM ANGELS Store		
15	aliexpress.com/store/5599230	Design Your T-Shirt Store		
16	aliexpress.com/store/900253036	DPP16 Store		
17	aliexpress.com/store/912501428	E-Point Flagg Store		
18	aliexpress.com/store/912418011	Ezio Store		
19	aliexpress.com/store/4070012	Flamestor Store		
20	aliexpress.com/store/5876386	GHH29 Store		
21	aliexpress.com/store/1100151440	glamour decoration 002 Store		
22	aliexpress.com/store/911769656	Gnirue Online Store		
23	aliexpress.com/store/5245226	GWG Store		
24	aliexpress.com/store/911601793	He Car Stickers and Decals Store		
25	aliexpress.com/store/5626268	HOCLOCE Store		
26	aliexpress.com/store/912239237	Huangjan Store		
27	aliexpress.com/store/5244228	jingbao Store		
28	aliexpress.com/store/5180002	ke le Store		
29	aliexpress.com/store/912609302	LOOOL Store		
30	aliexpress.com/store/911764307	marlar33 Store		
31	aliexpress.com/store/911384105	Morton Store		
32	aliexpress.com/store/5048318	ou da Store		
33	aliexpress.com/item/1005003313867125.html	pku.7 Store		

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34	aliexpress.com/store/911113033	Power metal tin signs Store
35	aliexpress.com/store/3631020	QYAutoPart Store
36	aliexpress.com/store/911444117	S85 Store
37	aliexpress.com/store/1100229072	Shop1100229072 Store
38	aliexpress.com/store/4430222	Shop4430222 Store
39	aliexpress.com/store/5870924	Shop5870924 Store
40	aliexpress.com/store/910554245	Shop910554245 Store
41	aliexpress.com/store/910721137	Shop910721137 Store
42	aliexpress.com/store/910911057	Shop910911057 Store
43	aliexpress.com/store/911052137	Shop911052137 Store
44	aliexpress.com/store/911063124	Shop911063124 Store
45	aliexpress.com/store/911198082	Shop911198082 Store
46	aliexpress.com/store/911325144	Shop911325144 Store
47	aliexpress.com/store/912269676	Shop912269676 Store
48	aliexpress.com/store/912624308	Shop912624308 Store
49	aliexpress.com/store/5373002	tao ji Store
50	aliexpress.com/store/912601031	TNF-SVP-ReBull-FDX Store
51	aliexpress.com/store/5783860	TomFlag Store
52	aliexpress.com/store/912396308	T-Shirt High Quality333 Store
53	aliexpress.com/store/912338315	VEHICAR E-commerce Store
54	aliexpress.com/store/912176055	VEHICAR Global Store
55	aliexpress.com/store/911755869	VEHICAR Store
56	aliexpress.com/store/5148094	waha Store
57	aliexpress.com/store/911745381	yellowpodshat Store
58	aliexpress.com/store/912608341	Yoo Baby Store
59	aliexpress.com/store/912330466	zhang8 Store
60	amazon.com/sp?seller=A1N3FKO157R56B	A1N3FKO157R56B
61	amazon.com/sp?seller=A1OPYLX4HME6M4	A1OPYLX4HME6M4
62	amazon.com/sp?seller=A1W3S86EPZA0GT	A1W3S86EPZA0GT
63	amazon.com/sp?seller=A2KSPF4V03B7X9	affordable commodity store
64	DISMISSED	DISMISSED
65	amazon.com/sp?seller=A14452TF8DFSV0	Auto Parts Major
66	amazon.com/sp?seller=A2PK2YMYJT7PMR	AUTOCARFT STORE
67	amazon.com/sp?seller=A3DCMPTLHA6SIB	bhetrjtry7lyurfksryheargdea
68	amazon.com/sp?seller=A2F80V35O77OYY	CAISHISHANGMAOYOUXIANGONGSI
69	amazon.com/sp?seller=A1YKJHFRBZZUTW	changchunshiyumoshangmaogongsi
70	amazon.com/sp?seller=A2LW96C9HCYJ0R	Chenghang Nongg
71	amazon.com/sp?seller=A36WH2IU7SCNDE	COCI-US
72	amazon.com/sp?seller=A1UQ1GVCY5ZG7D	Colorfulsign
73	amazon.com/sp?seller=AEULSJOKAGPL3	CTIC
74	amazon.com/sp?seller=A17V238HTSGLG8	cutespree
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