

**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-03212

Judge Sara L. Ellis

Magistrate Judge Sheila M. Finnegan

PRELIMINARY INJUNCTION ORDER

Plaintiff General Motors LLC (“GM” or “Plaintiff”) filed a Motion for Entry of a Preliminary Injunction against the fully interactive, e-commerce stores¹ operating under the seller aliases 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 July 1, 2022, [24] (“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

¹ The e-commerce store urls are listed on Schedule A hereto under the Online Marketplaces.


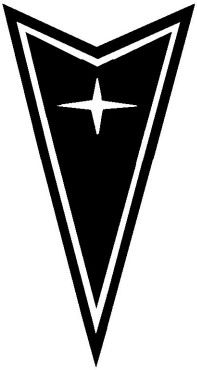
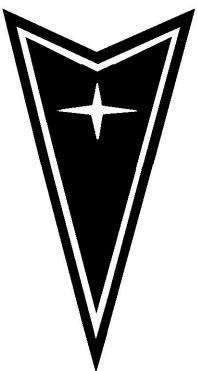
conclude that Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more seller aliases, offer shipping to the United States, including Illinois, and have sold products using infringing and counterfeit versions of GM's federally registered trademarks (the "Pontiac 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 Pontiac Trademarks. *See* Docket No. [17], Exhibit 2 to the Declaration of Andrea Ankawi, 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 Pontiac Trademarks. A list of the Pontiac Trademarks is included in the below chart.

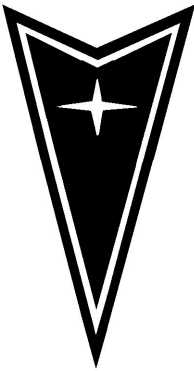
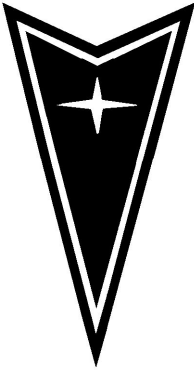
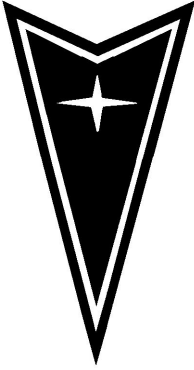
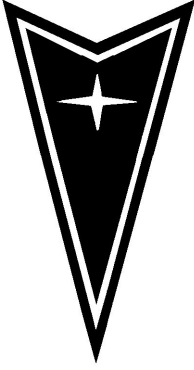
Registration No.	Trademark	Class	Goods and Services
647,239	PONTIAC	037	Maintenance and repair service for automotive vehicles, parts, and accessories.
1,467,546	PONTIAC	028	Toys and playthings, namely; toy vehicles, toy cars, toy model hobbycraft kits.
1,701,857	PONTIAC	024	Towels.
1,704,693	PONTIAC	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,

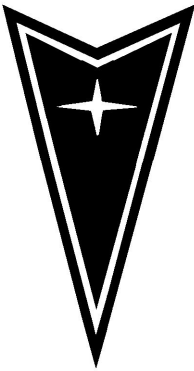
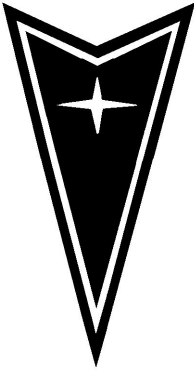
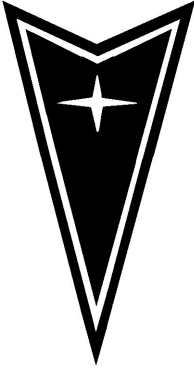
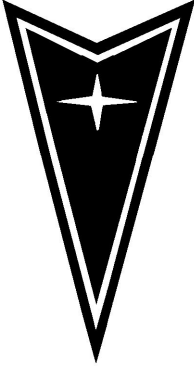
Registration No.	Trademark	Class	Goods and Services
			operation, maintenance, service and repair, and technical facts and specifications of motor vehicles.
1,744,568	PONTIAC	020	Key fobs not made of metal.
2,539,540	PONTIAC	020	Stools, chairs, pillows, non-metal license plates, non-metal key tags.
2,563,775	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	<p>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.</p> <p>Leather key chains.</p> <p>Non-metal key chains, plastic key chain tags, key fobs not of metal, non-metal key rings, plastic key rings.</p> <p>Miniature replicas of vehicles, and toy vehicles.</p>
2,683,733	PONTIAC	020	Chairs, non-metal key chains, non-metal key fobs, non-metal key

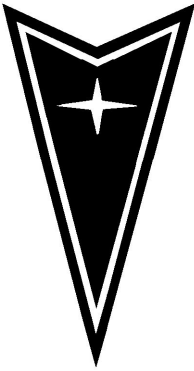
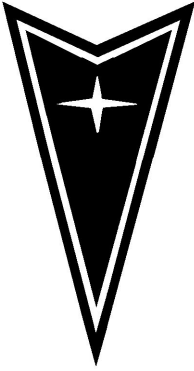
Registration No.	Trademark	Class	Goods and Services
			holders, non-metal key rings, non-metal key tags, non-metal license plates.
2,685,227	PONTIAC	009	Magnets, thermometers not for medical use, computer game software, mouse pads, neon signs, calculators.
1,711,668	PONTIAC FIREBIRD	016	Printed materials; namely, manuals, brochures, and catalogs pertaining to the features and controls, operation, maintenance, service and repair, and 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.

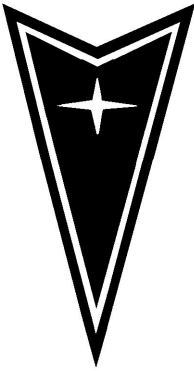
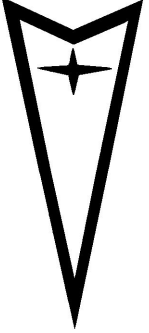


Registration No.	Trademark	Class	Goods and Services
3,329,341	FIERO	012	Automobile accessories, namely, badges for vehicle trim.
3,329,342	FIERO	016	Decals.
2,686,611	GRAND AM	020	Non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license 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 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.






Registration No.	Trademark	Class	Goods and Services
2,805,682	VIBE	028	Die cast toy vehicles, plastic model toy vehicles, and radio controlled toy vehicles.
1,495,970		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.
1,697,696		024	Towels.





Registration No.	Trademark	Class	Goods and Services
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.
1,744,567		020	Key fobs not made of metal.

Registration No.	Trademark	Class	Goods and Services
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.
2,570,842		018	Wallets.

Registration No.	Trademark	Class	Goods and Services
2,625,151		018	Umbrellas, wallets.
2,635,330		006, 018, 020, 028	<p>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.</p> <p>Leather key chains.</p> <p>Non-metal key chains, plastic key chain tags, key fobs not of metal, non-metal key rings, plastic key rings.</p> <p>Miniature replicas of vehicles, and toy vehicles.</p>

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		012	Wheel cover center caps.
4,338,294		027	Floor mats for vehicles.
1,489,529		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		012	Upholstery for vehicles; exterior and interior badges for vehicles.

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 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, 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 Pontiac 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 Pontiac 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 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; 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 Pontiac 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"), 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 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, Walmart, Etsy, 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 Pontiac Trademarks.

5. Any Third Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, eBay, 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, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the 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 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 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, eBay, Alipay, Walmart, Wish.com, Alibaba, Ant Financial, Amazon Pay, Etsy, DHgate, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

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.

7. 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.
8. GM’s Schedule A to the Complaint [2], Exhibit 2 to the Declaration of Andrea Ankawi [17], 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 the Northern District of Illinois Local Rules. Any third party impacted by this Order may move for appropriate relief.
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:

A handwritten signature in black ink, appearing to read 'S. L. Ellis', written over a horizontal line.

Sara L. Ellis
United States District Judge

Dated: August 5, 2022

**General Motors LLC v. The Partnerships and Unincorporated Associations Identified on Schedule
"A" - Case No. 22-cv-03212**

Schedule A

Defendant Online Marketplaces		
No	URL	Name / Seller Alias
1	amazon.com/sp?seller=A1K0PBY355S3E0	Viksee
2	DISMISSED	DISMISSED
3	amazon.com/sp?seller=A2GG7M9NHMDGKH	vooviro
4	amazon.com/sp?seller=A1URXMAFT1KIMN	weiboostore
5	amazon.com/sp?seller=A3HCQTCUT6CI49	WILLSS Direct
6	amazon.com/sp?seller=A3AWBPP29UZ4EF	xgjfgkjk
7	amazon.com/sp?seller=AWEEAR9XD02H0	xingdabhd
8	amazon.com/sp?seller=A2KC2CIRI0OXAZ	Yangdmu
9	amazon.com/sp?seller=A3SZLWWYZ15WVH	YLFDXQ
10	amazon.com/sp?seller=A1G67VSPVZ1P0F	yuekewujinjingmao
11	amazon.com/sp?seller=A3GAT19TZJ6M3M	Yujiangqupengpengabaihuodian
12	amazon.com/sp?seller=A2IAPDEBX98DO2	yunzhilin
13	amazon.com/sp?seller=AO4BTU8WMK45O	Zanyuan Technology
14	amazon.com/sp?seller=A3TWJPVC4LAV68	zhangchang12129
15	amazon.com/sp?seller=A36ES3YTVAZCDF	zheshiwdedian
16	amazon.com/sp?seller=A4NFXDMKRQFUH	zuocaism
17	amazon.com/sp?seller=A1LFZE7GOAXUPG	ZZFUMI
18	amazon.com/sp?seller=A2LM0KIETYB4T	ChangMao Burke
19	amazon.com/sp?seller=A34MX1E4NNGYS	Rhino Tuning
20	amazon.com/sp?seller=AQ54R8F0FC6WS	steel.frame.motor
21	ebay.com/usr/alwaysclothes	alwaysclothes
22	ebay.com/usr/bestkang3	bestkang3
23	ebay.com/usr/hk.xiaox	hk.xiaox
24	ebay.com/usr/ilnk8218	ilnk8218
25	ebay.com/usr/liseanleae	liseanleae
26	ebay.com/usr/rosamund123	rosamund123
27	ebay.com/usr/xiyun668	xiyun668
28	wish.com/merchant/5e837f0eeec4ed0691e4c0b7	11JYH917J
29	wish.com/merchant/584d502373c8764c862b27c4	3 hope
30	wish.com/merchant/6115318af199bb2612d2f676	Aboleng

31	wish.com/merchant/5f1677738a322c000047f026	AngleBab
32	wish.com/merchant/5ea3aeaf98a809528142621b	ArlenCrystalbWmRhX
33	wish.com/merchant/57ff7a0a8bf5da3015bf0d88	bagsworld2046
34	wish.com/merchant/5f86c1eeefb822afc82a41cd	bannerhatcaps
35	wish.com/merchant/5aa89b1eb722cf156f30b212	BaoBao520520
36	wish.com/merchant/5eb1d476b1009e24ea838a5b	bartonvenetta
37	wish.com/merchant/559291e7ebcb0040619289f7	beautiful2015
38	wish.com/merchant/5fab08125b7048362d095a99	belindaMarket
39	wish.com/merchant/540d7f031d2d43129f7a8578	biyun fashion
40	wish.com/merchant/612f84567b59da3bcced3475	Calypso Luminous
41	wish.com/merchant/5d57d05440defd7030aca41b	Car Bling Styling M
42	wish.com/merchant/6130e1a9b2b609bc4ead90d4	carmenuzcatgui66
43	wish.com/merchant/5e71c070f2bef60661bd36c8	Cesar Woodall
44	wish.com/merchant/6136ed6e1a126c5d3795cff1	chaiyingchao01907
45	wish.com/merchant/5e85afafcb44f96abb0661f2	chenbeibei 552018
46	wish.com/merchant/5e818e55ab0739004c7b6023	chenmeixiang1129
47	wish.com/merchant/6175043b87605bce84fa5318	chenpengling84515
48	wish.com/merchant/60cd530bb060c12ebbdcb02a	chenxu8016
49	wish.com/merchant/5e7c5cb82260a95cb9728a84	chenyuan32
50	wish.com/merchant/5fb00d031f5a37002a6635c8	chickenbos90
51	wish.com/merchant/60123913ae4ee6432c468b4f3	Chott and Jay Sukow

52	wish.com/merchant/540edce17a9eb460a80d0ac9	chunmei fashion
53	wish.com/merchant/5e63636ab24fc90dc26d1a28	chzvuaasd
54	wish.com/merchant/5e2254e63733da018061e061	compu_service albert
55	wish.com/merchant/61330b6cbdca6191c3b5ad4f	daiende52957
56	wish.com/merchant/54153db97541ce3cd524e8b2	daqingma plaza
57	wish.com/merchant/5ad07f08a71fbf7b6dadf928	dengdengdadad
58	wish.com/merchant/60bb006df69e463fd11e95df	dengxinxin21189
59	wish.com/merchant/5413adf2f8abc8347ba07e15	dingzhong fashion
60	wish.com/merchant/6020efbeb54280b23433b40b	Discovery Green
61	wish.com/merchant/61331fbcde5238e638bbd241	dongqingshi51372
62	wish.com/merchant/5e96a66d942cd434a13e6ab5	Duodownby Pants
63	wish.com/merchant/600575e8fc7ecd84543315ed	Enasam
64	wish.com/merchant/5fbcae8c0767311374ff5f08	Endorphins
65	wish.com/merchant/614015287918bfae8ed54543	fanhaoxuan32421
66	wish.com/merchant/613380ce87c7635008b5ad3d	Fashion Nexus
67	wish.com/merchant/5f79da21ec54daf3beafb7b4	fdsef
68	wish.com/merchant/5e452b93ddbcbe799cb3e87d	Fenghua Wellyou Sing Noledge
69	wish.com/merchant/5ecb39b484e79f1e7ca6e5e2	fhuxyi
70	wish.com/merchant/5e69421c29e786781f4522bf	fiw xos
71	wish.com/merchant/5417d099f8abc811d4934e6d	fugeng fashion
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