

**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-03384

Judge Elaine E. Bucklo

Magistrate Judge Gabriel A. Fuentes

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 fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A attached hereto (the “Seller Aliases”).

THIS COURT HEREBY 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. 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 counterfeit and infringing versions of GM’s federally registered trademarks (“Chevrolet Trademarks”) to residents of Illinois. A list of the GM Trademarks is included in the below chart.

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

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
2,866,966	AVALANCHE	012	Motor land vehicles, namely automobiles, trucks, sport utility vehicles, vans, engines therefor and structural parts thereof excluding railcars or parts thereof.
5,751,576	BLAZER	023	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks and vans.
1,711,664	BLAZER	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.
2,656,665	BLAZER	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.
2,561,229	BEL AIR	006	Non-luminous and non-mechanical metal street signs, non-luminous and

			non-mechanical parking signs, non-luminous and non-mechanical tin signs, metal key rings, and metal license plates.
4,394,946	BEL AIR	012	Exterior and interior badges for motor land vehicles.
2,059,324	BEL AIR	028	Scale models of automobiles
3,185,665	C6	006; 016; 021; 024; 025	Metal key chains. Pens. Mugs, beverage glassware, and thermal-insulated containers for food or beverages. Fleece blankets. Clothing, namely, jackets, shirts, sweatshirts, and t-shirts.
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 thereof, 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





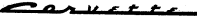

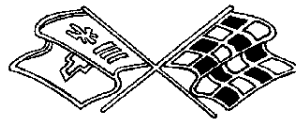
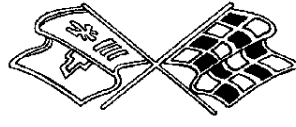
4,117,179	ZL1	007	Automotive engine blocks
216,070	CHEVROLET	012	Automobiles
1,540,658		028	Toys and playthings; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, friction-powered toy vehicles, and toy model hobbycraft kits
647,236		037	Maintenance and repair 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	 CHEVROLET	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;









			<p>sunglasses; tape measures; telephones; thermometers not for medical use; tire pressure gauges; video rewinders; yard sticks</p>
2,736,654		020	<p>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</p>
2,779,456		006	<p>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</p>










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





2,463,897		006	Non-mechanical metal street signs, non-mechanical metal parking signs, non-mechanical tin signs, metal license plates.
2,311,398		025	Jackets, hats.
2,314,496		006	Metal license plates.
2,349,821		016	Pressure sensitive graphics for application to automobiles, decals, stickers, bumper stickers and calendars.
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
2654528		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	Sunglasses, eyeglass cases and computer peripheral mouse pads Jewelry, namely, tie tacks, lapel pins, watches and charms Note pads, playing cards, posters Umbrellas, luggage, gym bags, leather key fobs, briefcase-type portfolios, attache cases and wallets









			<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	<p>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</p>
3,739,089		009	<p>Sunglasses, sunglass cases, computer mouse, laptop carrying cases, CD cases, neon signs</p>
3,739,090		012	<p>Fitted dashboard covers for vehicles, vehicle tire valve stem caps, fitted covers for vehicles, license plate frames</p>
3,739,092		018	<p>Wallets, duffle bags, backpacks, umbrellas, trunks</p>
3,739,093		020	<p>Stools</p>










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








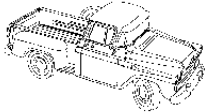

4,601,526		021	Mugs, travel mugs, drinking glasses, water bottles sold empty, portable beverage coolers
4,601,527		025	Shirts, hats, jackets, coats, pullovers
4,719,036		006	Non-luminous and non-mechanical metal signs
4,719,043		018	Duffel bags, leather credit card cases
2,545,728		025	Clothing, namely, 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,

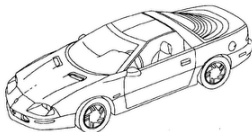
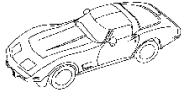
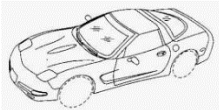
			checkbook covers, children's activity books, decals, note pad holders, note pads, paperweights, pen and pencil holders, pens, photo albums, pictures, playing cards, posters, reproduction lithographic prints, trading and collector cards
2,578,899		025	Sleepwear, sunvisors, and vests
2,666,595		020	Chairs, 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.

			<p>Mugs, travel mugs, drinking glasses, water bottles sold empty, non-electric portable beverage coolers</p> <p>Shirts, hats, jackets, coats, pullovers</p> <p>Toy vehicles, remote controlled toy vehicles</p>
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
6,364,458		012	Vehicle windshields; vehicle windows.
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 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 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, 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 Chevrolet 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 Chevrolet 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 Chevrolet 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;
 - d. further infringing the Chevrolet 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 Chevrolet 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 Chevrolet 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.

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 [16], and the TRO [22] 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.

IT IS SO ORDERED.

Dated: August 9, 2022

A handwritten signature in black ink, reading "Elaine E. Bucklo". The signature is written in a cursive, flowing style. The first name "Elaine" is written with a large, stylized 'E' and 'l'. The last name "Bucklo" is written with a large, stylized 'B' and 'l'. The signature is positioned above a horizontal line.

Elaine E. Bucklo
United States District Judge

**General Motors LLC v. The Partnerships and Unincorporated Associations Identified on Schedule "A" - Case
No. 22-cv-3384**

Schedule A

Defendant Online Marketplaces

No	URL	Name / Seller Alias
1	aliexpress.com/store/912621243	JHTRRXG Store
2	aliexpress.com/store/1102046801	Molly CarCar Store
3	aliexpress.com/store/1100036052	Shop1100036052 Store
4	aliexpress.com/store/1100976225	Shop1496961 Store
5	aliexpress.com/store/1101717960	WendyYang Store
6	aliexpress.com/store/912060801	YUANPIN Store
7	amazon.com/sp?seller=A1D2894BWO62CV	A1D2894BWO62CV
8	amazon.com/sp?seller=A27I8A2E5E7QL5	A27I8A2E5E7QL5
9	amazon.com/sp?seller=A3AXD42DQIDZQ8	AIFEEDING
10	amazon.com/sp?seller=A308DKFVTPPYQR	aifou
11	amazon.com/sp?seller=ATEGMET5MYQCX	AJILU
12	amazon.com/sp?seller=ARVVWLJ8K7Q3E	AMZ--the warehouse
13	amazon.com/sp?seller=A3MF1JKN1CV476	asdgwegdfvasf
14	amazon.com/sp?seller=A1TVTLMWG598IB	Ashley Sandoval
15	amazon.com/sp?seller=A206E90DEO3V88	beiujnis
16	amazon.com/sp?seller=A2W1GA4GJ1J7J9	bibadianzishangwu
17	amazon.com/sp?seller=AFGOXUCUVKR7U	Bingbingdedian
18	amazon.com/sp?seller=AFUCCIC63DYQI	boguiasdkjets
19	amazon.com/sp?seller=A1RD9HDAW6DQGB	Brenda+
20	amazon.com/sp?seller=AOS4RRCQW75A	BS Car
21	amazon.com/sp?seller=AOD706YKFG6J	CAARTIXER
22	amazon.com/sp?seller=A3NU5JQBRLFTAB	Chan Tai
23	amazon.com/sp?seller=A30QS3DKDY93UQ	ChangshanTRA
24	amazon.com/sp?seller=A11CXUWF95JIHU	chengduhuijiewukejiyouxiangongsi
25	amazon.com/sp?seller=A3LX591C2093VB	ChengXianKaiLunGongYiYouXianGongSi
26	amazon.com/sp?seller=A2P0Q9OS3F6JLV	Cinke
27	amazon.com/sp?seller=A3IKJFRZZ7C5ZR	danzhouyunqiushangmaoyouxiangongsi
28	amazon.com/sp?seller=A32MT36HWJL5R6	Deefielly
29	amazon.com/sp?seller=A3HR7FQD9YPZG3	Dennis Jizmejian
30	amazon.com/sp?seller=A3H3UMFAUGJUBS	Elizabeth Olvera
31	amazon.com/sp?seller=AQSVCAQNACYU5	Enmlszjr2
32	amazon.com/sp?seller=A1AN6OH3APDVZI	FELLLL

33	amazon.com/sp?seller=AZ01XROI03ETH	fenfendeduano
34	amazon.com/sp?seller=A3SO5UGO82XWT9	Flow flag XZX
35	amazon.com/sp?seller=AIVXSU1HWPGA8	Funyytoys
36	amazon.com/sp?seller=A1ZHT8X075OUGG	fuyidai
37	amazon.com/sp?seller=A188JSS3UFTMBF	g9iJpeKC
38	amazon.com/sp?seller=A3A89LA7JTW73V	General supermarket
39	amazon.com/sp?seller=A3P447V64NH1I5	GOODIE TECHNOLOGY PTE. LTD.
40	amazon.com/sp?seller=A1PG9E2X4NPHJS	GreedyYory
41	amazon.com/sp?seller=A3KE6MDZ6OXD22	Guangzhou Tianhe qinchuang Trade Co., Ltd
42	amazon.com/sp?seller=A1BVSGXLF6RDV	HAHALUK
43	amazon.com/sp?seller=ACHCRG2NIYPNZ	haikoujieruifengdianzishangwuyouxiangong
44	amazon.com/sp?seller=A60Y2QB1L953P	Hanhujek
45	amazon.com/sp?seller=AMMD6TP4Y922A	Hefei Xinzhan District taimowe department store
46	amazon.com/sp?seller=A1MYA9YH7YEGB0	hefeikerongbolipeijianyouxiangongsi
47	amazon.com/sp?seller=A3Q95NAYMRK5T4	hefeinuzuoshangmaoyouxiangongsi1
48	amazon.com/sp?seller=A1ANIU914J9OY4	HekIng Yongfrcai
49	amazon.com/sp?seller=A37QD61G5WB11A	heshuian
50	amazon.com/sp?seller=A7CPC6G05WUY	HomewallArt
51	amazon.com/sp?seller=AIM174QHDKG1C	Hongyan network technology
52	amazon.com/sp?seller=ABZNYUQ7S5C2K	IHADHOME
53	amazon.com/sp?seller=AZIEI3KCCHTZI	jasl654
54	amazon.com/sp?seller=A39YW3JTFN46D3	Jimei Store
55	amazon.com/sp?seller=AU22GVFGPWHKY	Jinan e-commerce
56	amazon.com/sp?seller=A3GZXT8ZFDD217	jinantangxiushangmaoyouxiangongsi
57	amazon.com/sp?seller=ATFWH16IDW8ZH	KEALAS
58	amazon.com/sp?seller=A2TGLP0TR9KT9P	KUEYFHKL
59	amazon.com/sp?seller=A1BRYLBA02QAAC	KUN DA
60	amazon.com/sp?seller=A6SDCVKJT9NG2	Kunca
61	amazon.com/sp?seller=AIEV1OOXBHZZCQ	LAIMAOSHANGMAOYOUXIANGONGSI
62	amazon.com/sp?seller=A1U2O2M02QDU1K	LECART
63	amazon.com/sp?seller=A1LDMXBL8JOKFA	Lei Ran Management Department
64	amazon.com/sp?seller=A1Y39JVNTWZL2	Leishishangmao Shop
65	amazon.com/sp?seller=ACFIQEZND0ACY	LEPDUN
66	amazon.com/sp?seller=A221QCBH5IWTEE	lianqichunianfeiriyongbaihuodian
67	amazon.com/sp?seller=A1948GFDRSOGQI	Linhanmeics
68	amazon.com/sp?seller=A3M6E29OPJOSLS	liuleileir
69	amazon.com/sp?seller=A27XUX1MUIPS59	LiuYangShiXianNanShangMaoYouXianGongSi
70	amazon.com/sp?seller=A2V65SS3CLFQZ8	LIXIAN SHANGMAO
71	amazon.com/sp?seller=AECAQ59NDX1TN	LiYouDeXiaoDian
72	amazon.com/sp?seller=A1V1NET9VFW6SA	loaloe elnaeb
73	amazon.com/sp?seller=A1PA8N3MCXHPCE	LYDD PARTS
74	amazon.com/sp?seller=A2FQED8NV3IMPA	Manglin department store, Xinzhan District, Hefei
75	amazon.com/sp?seller=A27CTPZJ6RSH71	MAQUNLIANG
76	amazon.com/sp?seller=A1QOB706VPASRG	MASTDEASR
77	amazon.com/sp?seller=A3MAO9X83LGVLN	Metaverse X
78	amazon.com/sp?seller=A32MOKQNXXTLIV	MIbhd

79	amazon.com/sp?seller=AMKS0IA5V9GVA	Mnneryss
80	amazon.com/sp?seller=ANH3E3RNUTXEV	Nedil
81	amazon.com/sp?seller=A2CEMJU8FI8P14	niyoufreestylema
82	amazon.com/sp?seller=A2HKCXC405ERQC	OIDUFNFG
83	amazon.com/sp?seller=AP7MEDJGPLW2D	PANWENSHANGMAO
84	amazon.com/sp?seller=A2GNGPQTUG5PDS	PeuryRone
85	amazon.com/sp?seller=A11XTFCCHALGA	Phewanear Auto
86	amazon.com/sp?seller=AK45ADP3JLD6V	Piateki
87	amazon.com/sp?seller=ANW2VWU66Q1CL	qionghaizhunheweidianzikejiyouxiangongsi..
88	amazon.com/sp?seller=A2N2EIEKZZC07U	quanzhongbaihuo
89	amazon.com/sp?seller=A345UH9M3BLWP5	RQ Tech
90	amazon.com/sp?seller=A3OJL01RGJ3K9Y	rtuytjyuj
91	amazon.com/sp?seller=A280V0PTIWL6KR	ruhuibaihuodian8866
92	amazon.com/sp?seller=A1I83DO8KCRZRT	RYJTYJYUJKYUKTUK
93	amazon.com/sp?seller=AHVTEPY2QVCSF	SHADYKNING
94	amazon.com/sp?seller=A33KMGJJOXCDNM5	shangshuixianminhaishangmaoyouxiangongsi
95	amazon.com/sp?seller=A22K7DIR71ZTFP	shyeer
96	amazon.com/sp?seller=A218WK7TCM0TWS	Smook
97	DISMISSED	DISMISSED
98	amazon.com/sp?seller=AF49NK4ZGOZ5D	tieshankaoshangpu
99	amazon.com/sp?seller=A3LFCD414R1UU4	ting deng bai huo jing ying bu
100	amazon.com/sp?seller=A2PJ7HS0U68PDQ	TongShanXianYouMiaoYingShangMaoYouXianGongSi
101	amazon.com/sp?seller=A37B0D0RQ7561	tongtanshangmaomei
102	amazon.com/sp?seller=A350ORWR1RF4OY	Tyler Boney
103	amazon.com/sp?seller=A1YEBDYTWBNY5M	Usudu
104	amazon.com/sp?seller=A1502SM3O6U8H1	visit chain store
105	amazon.com/sp?seller=A27FOW8NBLZW68	Visit the Shuoran store
106	amazon.com/sp?seller=A1OQB4J3B3MV2B	WalenAlok
107	amazon.com/sp?seller=A3MZJFX4YDK0VQ	WangHai 3
108	amazon.com/sp?seller=A208ZYESHT519H	WeibinStore
109	amazon.com/sp?seller=A1LV58SQXOTE11	Weytff
110	amazon.com/sp?seller=A2DTYX8UMCZT3M	WFENDE
111	amazon.com/sp?seller=A2UZZVJDDIRSUE	WSHFD
112	amazon.com/sp?seller=A6U7F2KELZ4YW	Wuhanweiziqishangmaoyouxiangongsi
113	amazon.com/sp?seller=A3G3RZFF9LN3PK	XIANGCHENGSHIPUQUANRIYONGBAIHUODIAN
114	amazon.com/sp?seller=A28IVMUXIJ9E7X	xiongteng
115	amazon.com/sp?seller=A19E27YGGZ9O6C	XJCBDYQ
116	amazon.com/sp?seller=A9R5PKQ83IHX6	xunyangchengguanzhenjiafengshenbaihuodian
117	amazon.com/sp?seller=AVVTQ782IZWYW	YangShangShangMao
118	amazon.com/sp?seller=A1SPA16VNRCF7E	YAO-TX
119	amazon.com/sp?seller=A2XEGXFAFWCI6V	yatengyuemaoyi
120	amazon.com/sp?seller=ALQCCRHHQ352T	yehhigg
121	amazon.com/sp?seller=A1U7W9894ZQCXN	Yibuoo
122	amazon.com/sp?seller=A3G0U59PPDJUDC	yincunhao
123	amazon.com/sp?seller=A19FONQPQMZWJ8	YUHAODOU
124	amazon.com/sp?seller=A5QYDUKGH3RS	yunxiaoxianbowubaihuodian

125	amazon.com/sp?seller=ASS5R3L2KE2ID	Zhangshu Store
126	amazon.com/sp?seller=A3QB8QTH2C72VL	Zhengli Yishu
127	amazon.com/sp?seller=AJRQN5Q83DVKM	Zhihuishop
128	amazon.com/sp?seller=A10NN1E4I5DF6J	zhoukoujiunashangmaoyouxiangongsi
129	amazon.com/sp?seller=AZKXINXTWL7NK	zhoukouleiwushangmaoyouxiangongsi
130	amazon.com/sp?seller=AF8X7RX9D16WC	zhoukoushijingfengshangmaoyouxiangongsi
131	ebay.com/usr/amaz-shops	amaz-shops
132	ebay.com/usr/aqep7932	aqep7932
133	ebay.com/usr/bahe66vh	bahe66vh
134	ebay.com/usr/bos6198	bos6198
135	ebay.com/usr/bwarterkty2875	bwarterkty2875
136	ebay.com/usr/caiyanyantiger	caiyanyantiger
137	ebay.com/usr/custom-trims	custom-trims
138	ebay.com/usr/deyangmengtue-_0	deyangmengtue-_0
139	ebay.com/usr/dynitx-pro	dynitx-pro
140	ebay.com/usr/fantasyfauto	fantasyfauto
141	ebay.com/usr/gangunshangwu102	gangunshangwu102
142	ebay.com/usr/glofecar666	glofecar666
143	ebay.com/usr/glofe-shops	glofe-shops
144	ebay.com/usr/gongxitongguo	gongxitongguo
145	ebay.com/usr/haidengauto	haidengauto
146	ebay.com/usr/hk-collett	hk-collett
147	ebay.com/usr/jiawei66	jiawei66
148	ebay.com/usr/laauto-sticker	laauto-sticker
149	ebay.com/usr/led_autolight	led_autolight
150	ebay.com/usr/ledlighting-2022	ledlighting-2022
151	ebay.com/usr/liaoz98	liaoz98
152	ebay.com/usr/my_auto_parts	my_auto_parts
153	ebay.com/usr/onelemon	onelemon
154	ebay.com/usr/pomelo-store	pomelo-store
155	ebay.com/usr/premiumshop_68	premiumshop_68
156	ebay.com/usr/ruautoparts	ruautoparts
157	ebay.com/usr/shiyoubole	shiyoubole
158	ebay.com/usr/superdutystre	superdutystre
159	ebay.com/usr/topparts_auhw	topparts_auhw
160	ebay.com/usr/ttundrainca	ttundrainca
161	ebay.com/usr/tyspeedracing	tyspeedracing
162	ebay.com/usr/weizhenbb	weizhenbb
163	ebay.com/usr/winetis-hots	winetis-hots
164	ebay.com/usr/winetis-shion	winetis-shion
165	ebay.com/usr/wowautoparts	wowautoparts
166	ebay.com/usr/xabj9895	xabj9895
167	ebay.com/usr/xlautoparts_hw	xlautoparts_hw
168	ebay.com/usr/ysautopart	ysautopart
169	ebay.com/usr/zhuy-39	zhuy-39
170	ebay.com/usr/zwb201009	zwb201009

171	wish.com/merchant/5e6947622fb13f56800c0420	Nnonpmeco
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