

**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-03872

Judge Elaine E. Bucklo

Magistrate Judge M. David Weisman

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

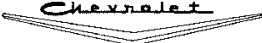
			non-mechanical tin signs, metal key rings, and metal license plates.
4,394,946	BEL AIR	012	Exterior and interior badges for motor land vehicles.
2,059,324	BEL AIR	028	Scale models of automobiles
3,185,665	C6	006; 016; 021; 024; 025	Metal key chains. Pens. Mugs, beverage glassware, and thermal-insulated 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 therefor, and structural parts thereof
2,652,036	TAHOE	020	Chairs, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, plastic flags seat cushions
3,537,570	TRAVERSE	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,704,309	TRAX	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural







			parts thereof
4,275,899	TURBO-FIRE	016	Decals
4,275,896	TURBO-JET	012	Exterior and interior badges for motor land vehicles
4,275,897	TURBO-JET	016	Decals
2,316,536	Z/28	025	Shirts, Jackets, Hats
2,538,434	Z06	025	Clothing, namely, caps, coats, dress shirts, golf shirts, hats, jackets, polo shirts, sunvisors, sweat shirts, sweaters, t-shirts
2,008,406	Z71	012	Modified off road chassis sold as components of trucks
2,308,988	Z71	025	Shirts, jackets, hats
2,654,527	Z71	020	Chairs, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, plastic flags
5,027,847	Z71 TRAIL BOSS	012	Passenger vehicles, namely, light duty pickup trucks
4,279,992	ZR2	016	Decals
5,566,056	ZR2	012	Motor land vehicles, namely, automobiles, sport utility vehicles, trucks, vans, engines therefor and structural parts thereof
4,172,493	ZL1	012	Motor land vehicles, namely, automobiles
4,117,179	ZL1	007	Automotive engine blocks
216,070	CHEVROLET	012	Automobiles
1,540,658		028	Toys and playthings; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles,



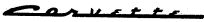

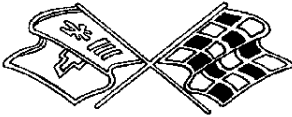
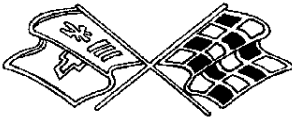
			friction-powered toy vehicles, and toy model hobbycraft kits
647,236		037	Maintenance and repair service for automotive vehicles, parts, and accessories
2,311,397		025	Shirts, jackets, hats, clothing ties and shorts
2,563,092		006	Metal money clips, metal knobs, non-mechanical metal street signs, non-mechanical metal parking signs, non-mechanical tin signs, metal key rings, metal license plates
2,678,153		020	Non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, non-metal money clips, stools
1,540,884		037	Maintenance and repair services for motor vehicles, parts and accessories
2,311,791		006	Metal license plates




2,311,792		025	Shirts, sweaters, jackets, blazers, hats, clothing ties, sweat suits, pants and shorts
2,311,918		024	Cloth banners, cloth flags, and bed blankets
2,538,436		021	Beverage glassware, bottle openers, can wraps, coasters, commemorative plates, coolers, corkscrews, cups, glass canisters, ice scrapers with brushes, mugs, ornament replicas of vehicles made of glass, crystal and ceramic, portable containers, salt and pepper shakers, service trays, squeeze bottles and steins
2,550,170		028	Balloons, Christmas tree ornaments, collectible toy cars, diecast vehicle models, golf balls, peddle cars, pinball machines, plastic vehicle kits, plastic vehicle models, radio controlled cars
2,562,025		014	Belt buckles, charms, clocks, coins, cuff-links, earrings, lapel pins, money clips, pendants, rings, watches








2,578,898		025	Aprons, gloves, headbands, rainwear, robes, scarves, sleepwear, slippers, socks, sunvisors, sweaters, and vests
2,734,714		009	Binoculars; calculators; photographic cameras; directional compasses; computer mouse pads; computer mice; computer game software for use in arcade games, hand held electronic games and video games; computer screen saver software; electric signs; eyeglass cases; eyeglasses; computer and video game cartridges; video game interactive hand held remote controls for playing electronics games; hand held joy stick units for playing video games; graduated rulers; interactive video games of virtual reality comprised of computer software and hardware; decorative magnets; magnifying glasses; neon signs; prerecorded videotapes featuring information on automobiles; radio antennas; radios; sunglasses; tape measures; telephones; thermometers not for medical use; tire pressure gauges; video rewinders; yard sticks









2,736,654		020	Badge holders made of plastic, chairs, desk ornaments made of bone, ivory, plaster, plastic, wax and wood, non-metal jewelry boxes, non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal license plates, mirrors, non-metal money clips, name badges made of plastic, name plates made of plastic, picture frames, pillows, plaques, plastic flags, seat cushions, stools
2,779,456		006	Metal banks, metal decorative boxes, ingots of common metal, metal key chains, metal key fobs, metal key rings, metal keys, license plates made of metal, non-luminous and non-mechanical metal signs, money clips made of metal, ornamental replicas of vehicles made of metal, non-luminous and non-mechanical parking signs made of metal, non-luminous and non-mechanical street signs made of metal, metal tool boxes
95,398		012	Automobiles, motor-vehicles, and parts thereof
1,519,942		028	Toys and play-things; namely, toy vehicles, toy cars, battery-operated remote and radio-controlled toy vehicles, friction-powered toy








			vehicles, and toy model hobbycraft kits
1,530,792		014	Clocks
1,661,628		012	Motor land vehicles;; namely, automobiles, passenger vans, cargo vans, sport utility vehicles, pick-up trucks, commercial land vehicles;; namely, automobiles, trucks, vans, sport utility vehicles, chassis for the foregoing and any combination thereof and structural parts therefor, engines therefor, and structural parts thereof; cabs and chassis for trucks; chassis for vans
1,668,924		042	Automobile and truck dealership services
2,555,071		006	Non-luminous and non-mechanical metal street signs and parking signs, metal license plates, and metal key rings
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	<p>Sunglasses, eyeglass cases and computer peripheral mouse pads</p> <p>Jewelry, namely, tie tacks, lapel pins, watches and charms</p> <p>Note pads, playing cards, posters</p> <p>Umbrellas, luggage, gym bags, leather key fobs, briefcase-type portfolios, attache cases and wallets</p> <p>Mugs, portable coolers, coasters not of paper and not being table linen and beverage glassware</p> <p>Shirts, sweaters, jackets, hats, clothing ties, sweat suits and shorts</p>









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










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






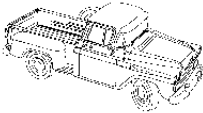

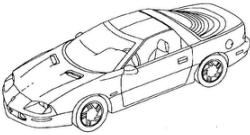
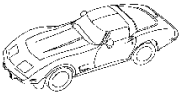
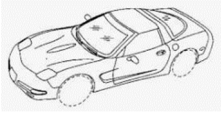
4,719,036		006	Non-luminous and non-mechanical metal signs
4,719,043		018	Duffel bags, leather credit card cases
2,545,728		025	Clothing, namely, shirts, t-shirts, jogging suits, sweat shirts, sweat pants, bandanas, sweaters, socks, hats, leather jackets, coats, ties, jackets
1,491,293		028	Toys and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

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

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

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

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

2,349,761		006	Metal license plates
2,756,065		020	Non-metal key chains, non-metal key fobs, non-metal key holders, non-metal key rings, non-metal key tags, non-metal novelty license plates
2,721,375		020	Key fobs, key tags, key chains and key rings not made of metal; non-metal license plates
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
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THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order (“TRO”) should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of 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 [17], and the TRO [24] 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.

Dated: August 31, 2022

IT IS SO ORDERED.

A handwritten signature in black ink, reading "Elaine E. Bucklo", written over 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-03872**

Schedule A

Defendant Online Marketplaces

No	URL	Name / Seller Alias
1	aliexpress.com/store/1101900457	21AutoParts Store
2	aliexpress.com/store/1101341032	4 Motorcar Store
3	aliexpress.com/store/1101434348	Aisun car accessories Store
4	aliexpress.com/store/1101397088	ANNA car stickers Store
5	aliexpress.com/store/1101989919	Auto Parts Sticker Store
6	aliexpress.com/store/1101357796	Automotive Zones Store
7	aliexpress.com/store/1101235484	AUTOPT.GO AUDIVW Store
8	aliexpress.com/store/1101951746	AYWE Store
9	aliexpress.com/store/1101617523	Bcars Car Accessories Store
10	aliexpress.com/store/1101995465	BREAD Auto Parts Store
11	aliexpress.com/store/1100560979	car buy car Store
12	aliexpress.com/store/1102089169	Car Retrofit emblem Store
13	aliexpress.com/store/1101627265	CARSHELP Store
14	aliexpress.com/store/1101558611	CNW-SHS Store
15	aliexpress.com/store/1101841403	Decal world Store
16	aliexpress.com/store/1100401849	Elifestyle Store
17	aliexpress.com/store/1101845176	FCFY Car Store
18	aliexpress.com/store/1101289013	Flamestor Store
19	aliexpress.com/store/1101792069	Fuwo Stylish decal Shop Store
20	aliexpress.com/store/1100506360	GOFLARE Official Store
21	aliexpress.com/store/1100441952	Good Car Accessories Store
22	aliexpress.com/store/1101127270	GZRIVERRUN Official Store
23	aliexpress.com/store/1101953677	Jppq Store
24	aliexpress.com/store/1100686355	KMDAUTOParts Store
25	aliexpress.com/store/1101265816	Leono Store
26	aliexpress.com/store/1101542352	LJN-ZDT Car Store
27	aliexpress.com/store/1101650662	Maria discount Store
28	aliexpress.com/store/1101278322	Modified-car stickers Store
29	aliexpress.com/store/1101751318	NYP168 Store
30	aliexpress.com/store/1101430746	Peach Hub Store
31	aliexpress.com/store/1101673776	QS Stickers Store
32	aliexpress.com/store/1101684366	RY2021 Store
33	aliexpress.com/store/1101810745	shaoduan Store

34	aliexpress.com/store/1102010218	Shop1100187204 Store
35	aliexpress.com/store/1102041009	Shop1100332129 Store
36	aliexpress.com/store/1102048434	Shop1100348433 Store
37	aliexpress.com/store/1102120243	Shop1102127243 Store
38	aliexpress.com/store/1102163063	Shop1102156997 Store
39	aliexpress.com/store/1101259834	Shop3085047 Store
40	aliexpress.com/store/1101282881	Shop3680012 Store
41	aliexpress.com/store/1101439300	Shop5022115 Store
42	aliexpress.com/store/1101343311	Shop5134084 Store
43	aliexpress.com/store/1101390688	Shop5788889 Store
44	aliexpress.com/store/1101537712	Shop910325063 Store
45	aliexpress.com/store/1101588950	Shop911207256 Store
46	aliexpress.com/store/1101619572	Shop911414059 Store
47	aliexpress.com/store/1101643953	Shop911567529 Store
48	aliexpress.com/store/1101399446	Su chang Store
49	aliexpress.com/store/1101961376	teshu Store
50	aliexpress.com/store/1101556494	TopBeauty Art Store
51	aliexpress.com/store/1101258738	UU-Autoparts Store
52	aliexpress.com/store/1101802177	VN professional spare parts Store
53	aliexpress.com/store/1101342455	Youqing's Store
54	aliexpress.com/store/1101328744	yq's Good Store
55	amazon.com/sp?seller=A17CADV783ERX2	A17CADV783ERX2
56	amazon.com/sp?seller=AW1K3GE95UUJA	ANPEX
57	amazon.com/sp?seller=A2BIDIAHFIKE3G	Autoacces Parts
58	amazon.com/sp?seller=A2M1U2PYG3YVAL	BB PIG
59	amazon.com/sp?seller=AAUCPOYTF91O	beilifeili
60	amazon.com/sp?seller=A2E57ZTBYSF6RG	binyiwangluo
61	amazon.com/sp?seller=A30LJPDAFKQ4MX	CAR DIAN
62	amazon.com/sp?seller=A30X90N760EA8E	CAR FAN
63	amazon.com/sp?seller=A311W5TE094R8V	changchunshitaohuayingshangmaoyouxiangongsi
64	amazon.com/sp?seller=A1NCL2XXL68EDH	chezhichenghdre

65	amazon.com/sp?seller=A1198Y4O0837NS	chongqingshenshihaijianzhucailliaoyouxiangongsi
66	amazon.com/sp?seller=A1XMIF50GOA76O	Dinuoda
67	amazon.com/sp?seller=AS0SBFMP9NZQW	dwqeqvchuhihcxzdsa
68	amazon.com/sp?seller=A3SJPIY8OROB1B	DzyunnanershendianpuAMZzz
69	amazon.com/sp?seller=A2Z12WA40CARFL	Future_Tse
70	amazon.com/sp?seller=AN4TSFTT0AJJ9	guangzhoushikangdadianzimaoyiyouxiangongsi
71	amazon.com/sp?seller=AIRVZ5EC3F2PX	Haikoushinenggengshangmaoyouxiangongsi
72	amazon.com/sp?seller=A1Q4TLGH3BTGJK	heart shaped shop
73	amazon.com/sp?seller=A12IA3FPMTZ2E7	hgebfg
74	amazon.com/sp?seller=A3ANMQGJ9YTD5K	HongHong AUTO
75	amazon.com/sp?seller=A3LYOJS8SYHPT8	Jackyu2020
76	amazon.com/sp?seller=A205V8B8HN0OA0	JSWHE
77	amazon.com/sp?seller=A2ZNRW93OGNC01	JunlongStore
78	amazon.com/sp?seller=A26O4HDDF86W9Q	JUNYUWANGLUO
79	amazon.com/sp?seller=A2IVE90U66UVC5	KAIRONG SHANGMAO
80	amazon.com/sp?seller=A2T7ZIIUFUQCQL	KAOQIAN
81	amazon.com/sp?seller=A2W8E3E2BE169H	kgjd8fjdgb
82	amazon.com/sp?seller=A3D64Z6LIX23Y5	KongY AUTO
83	amazon.com/sp?seller=A3NUBBP6DN4Q67	kunmingxiongkuidianzishangwuyouxiandezhengongsi
84	amazon.com/sp?seller=A1BZ2GFXB566OR	LEPAI
85	amazon.com/sp?seller=A1PQZDVG8R0YOJ	liuyangshizhandandianzimaoyiyouxiangongsi
86	amazon.com/sp?seller=A3C2FR0XC4JD	liuzhuangzhuangshou

	0U	
87	amazon.com/sp?seller=A23XC0LCAFGD30	LWWL
88	amazon.com/sp?seller=AQEP60ES60GH6	Mark Polo
89	amazon.com/sp?seller=A2049VDNUUND7U	meerkat11
90	amazon.com/sp?seller=A1Z70Y2D4BVM9	Old tavern
91	amazon.com/sp?seller=AN7UAKZ65ARMJ	Phoenix Auto Parts
92	amazon.com/sp?seller=A28K1UHGIHB0M3	Priscilla Case
93	amazon.com/sp?seller=AQQFKDX8KV0OE	putianchenningmaoyi
94	amazon.com/sp?seller=A2EDWT41B4PWPM	qinhuangdaoleijikejiyouxiangong
95	amazon.com/sp?seller=ASGGPZE1HRTQ5	rgebgfdfsdaewqvfd
96	amazon.com/sp?seller=A1ST1WQYRSRTNF	Richae
97	amazon.com/sp?seller=A2OA8LQMCRHS37	shanggaoxianhuodongbaihuodian
98	amazon.com/sp?seller=A2UOB SWNDZCSS5	shanxiwanshunlaixiangtiyuyongpinyouxiangongsi
99	amazon.com/sp?seller=ADR64YIIYVOYI	shbn6lpoj
100	amazon.com/sp?seller=A1SXTNNJ6UF69D	snfdkiuhdsawjyuikim
101	amazon.com/sp?seller=A39MPIADMB2R5D	somporn
102	amazon.com/sp?seller=ANHQ1PCCC2K2M	SuMei Store
103	amazon.com/sp?seller=A2JNPDCCKXTGLTX	Wheel Stickers
104	amazon.com/sp?seller=A1Q4U1NWC9SW8L	XCP-Store
105	amazon.com/sp?seller=A20FB3W821V43A	Xqc Z 6352
106	amazon.com/sp?seller=A1M5VGZT1S6FRV	YEOLD
107	amazon.com/sp?seller=A2U7BK4BCQIXJ7	Yichunfuhegonghaodianzishangwu
108	amazon.com/sp?seller=A1FYI9GWK0M	zhanjinzhu

	RML	
109	ebay.com/usr/2022offroad	2022offroad
110	ebay.com/usr/8_47032	8_47032
111	ebay.com/usr/adorn-car	adorn-car
112	ebay.com/usr/allez_our	allez_our
113	ebay.com/usr/auto-0608	auto-0608
114	ebay.com/usr/autofasts2g	autofasts2g
115	ebay.com/usr/auto-jiyi	auto-jiyi
116	ebay.com/usr/car_interior_store	car_interior_store
117	ebay.com/usr/dakoamngzo	dakoamngzo
118	ebay.com/usr/dang76615	dang76615
119	ebay.com/usr/ebwe_77	ebwe_77
120	ebay.com/usr/ecarno.2	ecarno.2
121	ebay.com/usr/flyteching	flyteching
122	ebay.com/usr/gogoshine1026	gogoshine1026
123	ebay.com/usr/hhtown2016_8	hhtown2016_8
124	ebay.com/usr/iqvc5957	iqvc5957
125	ebay.com/usr/jiyieyieauto	jiyieyieauto
126	ebay.com/usr/little-big-brother	little-big-brother
127	ebay.com/usr/mokuyo	mokuyo
128	ebay.com/usr/smartshop888-88	smartshop888-88
129	ebay.com/usr/the.aa	the.aa
130	ebay.com/usr/vjhw1217	vjhw1217
131	ebay.com/usr/yesall0601	yesall0601
132	ebay.com/usr/yuanjie_32	yuanjie_32
133	ebay.com/usr/zhangrenfeng2001	zhangrenfeng2001
134	walmart.com/seller/101173586	Perfect Office Products 2020