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

THOSE CHARACTERS FROM CLEVELAND, LLC, Plaintiff, v. THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A HERETO, Defendants.	Case No. 24-cv-11678 Judge Georgia N. Alexakis

PLAINTIFF'S MEMORANDUM IN SUPPORT OF JOINDER

Plaintiff THOSE CHARACTERS FROM CLEVELAND, LLC ("Plaintiff"), by and through their undersigned counsel, state as follows in support of joinder of the Defendants in the above-captioned case.

I. INTRODUCTION

Plaintiff submits this memorandum in order to demonstrate that all Defendants are properly joined pursuant to Fed. R. Civ. P. 20 because Plaintiff's right to relief is "related to or arises out of the same … series of transactions or occurrences."

Plaintiff seeks redress for the ongoing infringement of its registered CARE BEARS copyright[1]. Plaintiff is the official source of products bearing the CARE BEARS copyright. (Declaration of Sean Gorman, ⁋ 4).

[1] Similar cases against multiple e-commerce store defendants have been filed across the country for over a decade. *See, e.g. Farouk Systems, Inc. v. Eyou Int'l Trading Co., Ltd., et al.,* No. 4:10 CV 2672 (S.D. Tex. Aug. 2, 2010); *The North Face Apparel Corp., et al. v. Fujian Sharing Import & Export Ltd. Co., et al.,* No. 10 CIV 1630 (S.D.N.Y.

A January 24, 2020, report titled *Combating Trafficking in Counterfeit and Pirated Goods* prepared by the U.S. Department of Homeland Security, Office of Strategy, Policy & Plans outlines the operation of e-commerce stores like those operated by the Defendants. [Attached hereto as Exhibit 1].

- "For counterfeiters, production costs are low, millions of potential customers are available online, transactions are convenient, and listing goods on well-known platforms provides an air of legitimacy. When sellers of illicit goods are in another country, they are also exposed to relatively little risk of criminal prosecution or civil liability under current law enforcement and regulatory practices." *Id*. at p. 10-11.
- "Not only can counterfeiters set up their virtual storefronts quickly and easily, but they can also set up new virtual storefronts when their existing storefronts are shut down by either law enforcement or through voluntary initiatives set up by other stakeholders such as market platforms, advertisers, or payment processors." *Id*. at p. 12.
- "In some cases, counterfeiters hedge against the risk of being caught and their websites taken down from an e-commerce platform by preemptively establishing multiple virtual store-fronts. A key underlying problem here is that on at least some e-commerce platforms, little identifying information is necessary for a counterfeiter to begin selling. In the absence of full transparency, counterfeiters can quickly and easily move to a new virtual store if their original third-party marketplace is taken down." *Id*. at p. 22.
- "Platforms generally do not require a seller on a third-party marketplace to identify the

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Mar. 16, 2010); *Louis Vuitton Malletier v. aaalvshop.com, et al*., No. 19- cv-61986 (S.D. Fla. Nov. 21, 2019); *Volvo Car Corporation, et al. v. The Unincorporated Associations Identified in Schedule A*, No. 18-cv-00977 (E.D. Va. Feb. 6, 2019); *CCA and B, LLC v. Douyong toy, et al*., No. 19-cv-01851 (N.D. Ga. Apr. 25, 2019); *Talavera Hair Products, Inc. v. Taizhou Yunsung Elec. Appliance Co., Ltd., et al*., No. 18-cv-00823 (S.D. Ca. Apr. 30, 2018), including hundreds of cases in the Southern District of New York and the Southern District of Florida.

underlying business entity, nor to link one seller profile to other profiles owned by that same business, or by related businesses and owners. In addition, the party that appears as the seller on the invoice and the business or profile that appears on the platform to be the seller, may not always be the same. This lack of transparency allows one business to have many different profiles that can appear unrelated. It also allows a business to create and dissolve profiles with greater ease, which can obfuscate the main mechanism that consumers use to judge seller credibility, namely reviews by other buyers." *Id*. at p. 39

Defendants take advantage of their anonymity, the mass reach afforded by the Internet and the cover afforded by international borders to violate Plaintiff's Copyright and exploit U.S. consumers. Intellectual property rights holders face increasing attacks on their intellectual property rights, as noted in the U.S. Department of Homeland Security's 2020 report. As a result, "filing individual causes of action against each counterfeiter ignores the form of harm" that Plaintiff faces from these Defendants. *Bose Corp. v. P'ships & Unincorporated Ass'ns Identified on Schedule "A"*, 334 F.R.D. 511, 517 (N.D. Ill. 2020). Joinder is consistent with hundreds of factually similar cases and comports with the strongly encouraged policy of "entertaining the broadest possible scope of action consistent with fairness to the parties." *See United Mine Workers of Am. v. Gibbs*, 383 U.S. 715, 724 (1966); s*ee also Bose Corp.*, 334 F.R.D. at 517 (e-commerce stores offering for sale counterfeit Bose products properly joined).

Plaintiff filed its copyright infringement claims to combat e-commerce store operators who trade upon Plaintiff's reputation and goodwill by offering for sale and/or selling unauthorized and unlicensed products using infringing and counterfeit versions of Plaintiff's federally registered Copyright (the "Counterfeit CARE BEARS Products"). The Defendants created numerous Internet Stores and designed them to appear to be selling genuine CARE

BEARS products, while selling inferior imitations of Plaintiff's products. (Declaration of Sean Gorman, ⁋⁋ 12, 14, 23). The Defendants share unique identifiers, such as design elements and similarities of the counterfeit products offered for sale, establishing a logical relationship between them and suggesting that Defendants' illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences. *Id.* ⁋ 17. Defendants go to great lengths to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal counterfeiting operations to violate Plaintiff's CARE BEARS Copyright and exploit U.S. consumers. *Id.* ⁋ 16. All of the Defendants in Schedule A have offered for sale or made sales to individuals located in the Northern District of Illinois. *Id.* ⁋ 13. By participating in this collaborative endeavor, Defendants have engaged in conduct that meets the criteria for joinder under Fed. R. Civ. P. 20(a).

II. SEVERANCE IS THE MINORITY APPROACH IN THIS DISTRICT AND UNDERMINES JUDICIAL ECONOMY

There is no controlling Seventh Circuit authority defining a single transaction or occurrence for purposes of joinder. A minority of Courts in this District have taken a narrower position than *Bose Corp*. and define "transaction, occurrence or series of transactions and occurrences" to require linking unique information between Seller Aliases (*e.g.,* email addresses, phone numbers, etc.). *See Estée Lauder Cosmetics Ltd. v. P'ships & Unincorporated Ass'ns Identified on Schedule A*, 334 F.R.D. 182, 184 (N.D. Ill. 2020) (Chang, J.) ("*Estée Lauder I*"); *Estée Lauder Cosmetics Ltd., et al. v. The Partnerships, et al.,* No. 20-cv-00845 (N.D. Ill. Jun. 22, 2020) (Lee, J.) (Docket Entry No. 40) ("*Estée Lauder II*") (together, the "Minority Approach Decisions"). This narrow approach does not permit joinder of any defendants. Rather, it requires plaintiff to show, at the pleading stage, that multiple e-commerce store seller aliases are operated by the same individual or entity. Moreover, the information required to meet such a stringent requirement is both not available prior to court ordered discovery and easily circumvented by defendants using false information.

The Minority Approach Decisions rely on distinguishable cases, construe allegations in the light most favorable to defendants, and undervalue certain considerations of judicial economy. For example, both cite the non-binding *Slep-Tone Entm't Corp. v. Roberto* case for the proposition that multiple defendants alleged to have infringed the same patent or trademark in a similar manner is not sufficient to establish joinder. 2013 U.S. Dist. LEXIS 151923, at *2 (N.D. Ill. Oct. 22, 2013). However, in *Slep-Tone Entm't Corp.*, the defendants were identifiable, distinct individuals and restaurants. *Id*. There were no allegations in *Slep-Tone Entm't Corp.* that the defendants' identities were unknown or that they were operating in a similar manner and during the same time period as part of the same "occurrence" of mass harm. The Minority Approach Decisions also construed facts in the light most favorable to the defendants by downplaying other commonalties between seller aliases as merely coincidental. *See, e.g*. *Estée Lauder I*, 334 F.R.D. 188-89 ("[i]t is just as likely that each online retailer decided to avoid being shut down yet again by removing the trademarks"); *Estée Lauder II* at p. 9 ("defendants with nearly identical product descriptions may in fact share no ties, with each simply copying the same description from elsewhere").

Finally, recognizing that most defendants settle or default in similar cases, the Minority Approach Decisions reason that "this Court must evaluate the evidence submitted in support of liability and, eventually, damages" which the Court reasoned undermines judicial economy. *Estée Lauder I*, 334 F.R.D. at 189. However, allegations in the complaint are accepted as true if a defendant defaults, so there would not be any evidence beyond plaintiff's allegations to evaluate with respect to liability. *United States v. Di Mucci*, 879 F.2d 1488, 1497 (7th Cir. 1989). Regarding a damages award, such a concern is not applicable in this case because Plaintiff will likely be seeking a statutory damages award pursuant to 15 U.S.C. § 1117(c). *See, e.g., Chapter 4 Corp. v. Fopu Import and Export Co., Ltd. Store, et al.*, No. 20-cv-04736 (N.D. Ill. Oct. 27, 2020) (Docket No. 49). Both Minority Approach Decision Courts, like other Courts in this District, have formulated their own baseline statutory damages awards for all defendants that default as a result of not participating in the underlying case. There is no "ensuing discovery and variety of defenses" to evaluate when a defendant defaults. *Estée Lauder I*, 334 F.R.D. at 190. *See also*, *Estée Lauder II* at p. 7 (citing to statutory damages cases involving defendants that appeared and made an adversarial presentation). Additionally, the Minority Approach Decision Courts did not consider the number of additional cases that would, by necessity, be filed in this District if their approach to joinder is adopted. The Courts in this District would still face the same number of defendants but spread out over a much larger volume of cases, antithetical to the concept of judicial economy.

III. ARGUMENT

A. Federal Rule of Civil Procedure 20 Liberally Allows Joinder

Fed. R. Civ. P. 20 permits joinder when "any right to relief is asserted against [defendants] jointly, severally, or in the alternative with respect to or arising out of the same transaction, occurrence, *or series of transactions or occurrences*; and . . . any question of law or fact common to all defendants will arise in the action." Fed. R. Civ. P. 20(a)(2) (emphasis added). Permissive joinder is to be liberally construed to promote convenience and judicial economy. *See First Time Videos, LLC v. Does 1-500*, 276 F.R.D. 241, 251-52 (N.D. Ill. 2011) (Castillo, J.). The Supreme Court has advised that, "joinder of claims, parties and remedies is *strongly encouraged*." *United Mine Workers of America v. Gibbs*, 383 U.S. 715, 724 (1966) (emphasis added). The Supreme Court has since reaffirmed its preference for a liberal interpretation of joinder, stating that "the impulse is toward entertaining the broadest possible scope of action consistent with fairness to the parties; joinder of claims, parties and remedies is strongly encouraged." *In re EMC Corp*., 677 F.3d 1351, 1358 (Fed. Cir. 2012) (quoting *Gibbs*, 383 U.S. at 724). Above all, the Seventh Circuit has noted that the purpose of a liberal Rule 20(a) joinder requirement "is to enable economies in litigation." *Elmore v. Henderson*, 227 F.3d 1009, 1012 (7th Cir. 2000). Courts have not provided a bright- line definition for this phrase so that it can continue to be flexible enough to allow effective trial management. *See In re EMC Corp*., 677 F.3d 1351, 1358 (Fed. Cir. 2012) (citing Charles Alan Wright et al., Federal Practice and Procedure § 1653 (3d ed. 2001)).

Courts have applied this "transaction or occurrence" requirement using a "case-by-case approach" based on a "flexib[le] . . . standard [that] enables the federal courts to promote judicial economy by permitting all reasonably related claims for relief by or against different parties to be tried in a single proceeding under the provisions of Rule 20." *In re EMC Corp*., 677 F.3d at 1358. The Seventh Circuit does not have a definitive standard for determining what constitutes a single transaction or occurrence. *See Bailey v. N. Trust Co.*, 196 F.R.D. 513, 515 (N.D. Ill. 2000) (explaining that "no hard and fast rules have been established" in this context). The phrase "transaction or occurrence" is also not defined in Rule 20(a); however, courts have looked to the similar "transaction or occurrence" test for compulsory counterclaims in Rule 13(a). *Mosley*, 497 F.2d at 1333; *PTG Nev., LLC v. Doe*, 2016 U.S. Dist. LEXIS 83546, at *7 (N.D. Ill. June 28, 2016).

In its analysis of Rule 13(a), the Supreme Court has stated that "[t]ransaction is a word of flexible meaning. It may comprehend a series of many occurrences, depending not so much upon the immediateness of their connection as upon their logical relationship." *Moore v. N.Y. Exch.*, 270 U.S. 593, 610 (1926); *see also Burlington N.R. Co. v. Strong*, 907 F.2d 707, 711 (7th Cir. 1990) (applying "logical relationship" test to determine whether the "transaction or occurrence" is the same for purposes of Rule 13(a)). Factors considered by Courts in this District include whether the alleged conduct occurred during the same general time period, involved the same people and similar conduct. *Lozada v. City of Chicago*, 2010 U.S. Dist. LEXIS 89231, at *7 (N.D. Ill. Aug. 30, 2010). The Court has "considerable discretion" and "flexibility" in determining whether Plaintiff has plausibly alleged such a relationship. *UWM Student Ass'n v. Lovell*, 888 F.3d 854, 863 (7th Cir. 2018). Other Circuits have applied the "logical relationship" test to interpret "same transaction or occurrence" as it appears in Rule 20(a) and found that "all reasonably related claims for relief by or against different parties" can be tried in a single proceeding. *Mosley*, 497 F.2d at 1333. Absolute identity of all events is unnecessary. *Id.*; *see also Alexander v. Fulton County,* 207 F.3d 1303, 1323 (11th Cir. 2000)).

Fed. R. Civ. P. 20 similarly does not define "occurrence" and courts have not considered the meaning of "occurrence" apart from the meaning of "transaction." *Bose Corp.*, 334 F.R.D. at 516. However, "canons of construction ordinarily suggest that terms connected by a disjunctive ... be given separate meanings," and the dictionary definitions suggest that "occurrence" is much broader than "transaction." *Id*. An "occurrence" is defined as something that simply happens or appears, and is not necessarily the product of joint or coordinated action. *Id*. *See also Oakley, Inc. v. The P'ships & Unincorporated Ass'ns Identified on Schedule "A",* No. 1:20-cv-05972 (N.D. Ill. Nov. 9, 2020) (unpublished) (Docket No. 27) ("Plaintiff has sufficiently demonstrated that [the asserted claims] arise out of the same occurrence or series of occurrences").

The Supreme Court's decision in *United States v. Mississippi*, 380 U.S. 128 (1965) further supports liberal joinder of parties. In that case, the Supreme Court held that the joinder of six defendants, election registrars of six different counties, was proper because the allegations were all based on the same state-wide system designed to enforce the voter registration laws in a way that would deprive African-Americans of the right to vote. *Id.* at 142. Although the complaint did not allege that the registrars directly interacted with each other, or even that they knew of each other's actions, or that each other's actions directly affected each other in any way, the Supreme Court interpreted Rule 20 to hold a right to relief severally because the series of transactions were related and involved common law and fact. *Id*. at 142-143. In accordance with *United States v. Mississippi*, it is not necessary for each of the Defendants to have directly interacted with each other to be joined.

B. The Well-Pleaded Allegations in Plaintiff's Amended Complaint Establish Joinder

"In assessing whether the requirements of Rule 20(a)(2) are met, courts must accept the factual allegations in a plaintiff's complaint as true." *Desai v. ADT Sec. Services, Inc.*, 2011 U.S. Dist. LEXIS 77457, at *8 (N.D. Ill. July 18, 2011). A court must construe the complaint "in the light most favorable to the plaintiff, accepting as true all well-pleaded facts alleged, and drawing all possible inferences" in favor of the plaintiff. *Tamayo v. Blagojevich*, 526 F.3d 1074, 1081 (7th Cir. 2008) (citing *Bell Atl. Corp. v. Twombly*, 550 U.S. 544, 555 (2007)). The plaintiff must only put forth enough "facts to raise a reasonable expectation that discovery will reveal evidence" supporting the plaintiff's allegations. *Brooks v. Ross*, 578 F.3d 574, 581 (7th. Cir. 2009).

The well-pleaded allegations in Plaintiff's Amended Complaint establish that Defendants are working in a similar manner and during the same time period to sell Counterfeit CARE BEARS Products, as part of the same "occurrence" which establishes a logical relationship supporting joinder. The screenshot evidence in Exhibit 3 to the Declaration of Sean Gorman shows that the Defendants were selling counterfeit resin charms infringing the same copyright during the same time period. [Dkt. No. 18]. For example, the screenshot evidence for Defendants definitively establishes that each of these Defendants was offering for sale and selling products infringing Plaintiff's CARE BEARS Copyright Registration No. VA 1-982-408 on resin charms in the third fiscal quarter of 2024. [Dkt. No. 18, pp. 1, 10, 19, 29, 36, 43, 50, 57, 67, 77, 86, 97, 104, 111, 120 and 127]. Joinder at this stage is consistent with hundreds of factually similar cases and comports with the strongly encouraged policy of "entertaining the broadest possible scope of action consistent with fairness to the parties." *See United Mine Workers of Am. v. Gibbs*, 383 U.S. 715, 724 (1966); s*ee also Bose Corp.*, 334 F.R.D. at 517 (e-commerce stores offering for sale counterfeit Bose products properly joined); *Oakley, Inc. v. The Partnerships, et al.*, No. 1:20-cv-05972 (N.D. Ill. Nov. 9, 2020) (unpublished) [Dkt. No. 27] ("Plaintiff has sufficiently demonstrated that [the asserted claims] arise out of the same occurrence or series of occurrences. Therefore, joinder of the 'Schedule A' Defendants is proper at this preliminary stage."); *Weifang Tengyi Jewelry Trading Co. Ltd v. The Partnerships, et al.*, No. 1:18-cv-04651 (N.D. Ill. July 5, 2018) (unpublished) [Dkt No. 150] ("[Plaintiff's] claims against [Defendants] rest in substantial part on the same legal and factual grounds as [Plaintiff's] claims against the other defendants, including that [Defendants] were involved in a counterfeiting network with the other defendants. Given the nature of [Plaintiff's] claims, joinder is proper under Rule 20(a)(2)."); *Too Faced Cosmetics, LLC v. Operators of KTKT Store, et al.*, No. 19-cv- 07762 (N.D. Ill. Feb. 12, 2020) (Lefkow, J.) [Dkt. Nos. 22, 27, 30] (finding joinder appropriate in factually similar case after supplemental briefing); *Gold's Gym Licensing LLC v. Operators of dropshipping fast ship Store, et al.*, No. 19-cv-07446 (N.D. Ill. Jan.15, 2020) (Lefkow, J.) [Dkt. Nos. 32, 38, 43] (same); *Otter Products, LLC, et al. v. James Chen, et al.*, No. 16-cv-06807 (N.D. Ill. Aug. 31, 2016) (Shadur, J.) (same). Indeed, cases like this one have proven effective at substantially reducing online counterfeiting and infringement and preventing consumer confusion.

Plaintiff's well-pleaded allegations establish that Defendants are operating in the same transaction, occurrence, or series of transactions or occurrences and, therefore, joinder is proper. Each of the Defendants uses common design elements, offers similar counterfeit products for sale, omits contact information or other information for identifying Defendants, offers no credible information regarding their physical addresses and uses the same advertising and marketing strategies to target consumers while attempting to evade enforcement.

Plaintiff's specific factual allegations, that Defendants are working in a similar manner and during the same time period to sell Counterfeit CARE BEARS Products, show a logical relationship supporting joinder. *Bose Corp.*, 334 F.R.D. at 516. Even if Defendants are not directly coordinating, Defendants "take advantage of a set of circumstances – the anonymity and mass reach afforded by the internet and the cover afforded by international borders – to violate [Plaintiff's] trademarks with impunity." *Id*. "[I]t is plausible that Defendants understand that their ability to profit through anonymous internet stores is enhanced as their numbers increase, even though they do not engage in direct communication or coordination." *Id*. Defendants are alleged to be infringers, and "want to blend in to cause consumer confusion." *Id.* at. 514. As a result of the Defendants' actions to obfuscate their identities and evade detection, it is not possible to link all or clusters of seller aliases together using arbitrary commonalities. As such, Plaintiff is not required to show and provide evidence that each of the Defendants are commonly owned at the pleading stage. Such linking efforts are extremely cumbersome, time consuming and not required by Fed. R. Civ. P. 20 to join multiple Defendants at the pleading stage, especially without adversarial presentation or the opportunity to conduct discovery.

C. Well-Pleaded Allegations Satisfy Federal Rule of Civil Procedure 20(A)(2)(B)

Plaintiff's well-pleaded allegations also satisfy Fed. R. Civ. P. 20(a)(2)(B), which provides that joinder is proper if "any question of law or fact common to all defendants will arise in the action." In this case, Defendants, without any authorization or license from Plaintiff, have jointly and severally, knowingly and willfully used and continue to use the CARE BEARS Copyright in connection with the advertisement, distribution, offering for sale, and sale of Counterfeit CARE BEARS Products into the United States and Illinois over the Internet. [Dkt. No. 14 at ¶ 28]. In addition, the methods Plaintiff uses to investigate and collect evidence about any infringing activity will be the same or similar for each Defendant. While each Defendant may later present different factual evidence to support individual legal defenses, prospective factual distinctions do not defeat the commonality in facts and legal claims that support joinder under Fed. R. Civ. P. 20(a)(2)(B) at this stage in the litigation. *See First Time Videos, LLC v. Does 1–500*, 276 F.R.D. 241, 251–52 (N.D. Ill. 2011) (Castillo, J.).

D. Joinder Promotes Judicial Efficiency, Fairness and Comports with Public Policy.

Joinder of the Defendants promotes judicial efficiency without impeding case administration or fairness to the parties and should be maintained. *See United Mine Workers*, 383 U.S. at 724 ("joinder of claims, parties and remedies is strongly encouraged."). the Seventh Circuit has noted that the purpose of a liberal Rule 20(a) joinder requirement "is to enable economies in litigation." *Elmore v. Henderson*, 227 F.3d 1009, 1012 (7th Cir. 2000).

The resources of the Court and other judges in this District will be substantially taxed if Plaintiff's claims against Defendants are severed into multiple separate lawsuits. "Requiring the filing of separate complaints could flood the courts with thousands of additional single defendant

Lanham Act cases, with no difference in resolution of nearly every case in a practical sense. The only thing that will inevitably occur is the slowdown of adjudications of other lawsuits, or the decrease of filings of cases which on their face have alleged plausible violations of the Lanham Act." *Bose Corp*., 334 F.R.D. at 517, n.6. As noted in *Bose Corp.*, severance of the Defendants in this Case alone would add dozens of additional cases to the dockets of the judges in the Northern District of Illinois.

Restricting joinder would also substantially reduce the ability for Plaintiff and other brand owners to effectively protect their intellectual property rights and consumers. This is especially true in the context of online counterfeiting. Online counterfeiting is rampant and widespread. Homeland security seizures of counterfeit goods have increased exponentially over the past ten years. In recent years, marketplace platforms have emphasized opening and marketing their services to sellers located in China and other foreign jurisdictions. These sellers are uniquely situated to avoid criminal and civil consequences for their counterfeiting actions. Due to the numerous problems that restricting joinder causes, there is no reason to add this additional burden on the court, the court system or Plaintiff at this very early stage of litigation.

IV. CONCLUSION

For the foregoing reasons, Plaintiff respectfully submits that joinder of the Defendants is appropriate under Federal Rule of Civil Procedure 20(a)(2), and Plaintiff's joined case against them should be permitted to continue. This approach is consistent with other courts and comports with the strongly encouraged policy of entertaining the broadest possible scope of action consistent with fairness to the parties.

Respectfully submitted,

Dated: December 11, 2024

By: s/ Michael A. Hierl

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CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Plaintiff's Memorandum in Support of Joinder was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on December 11, 2024.

s/Michael A. Hierl