

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

HONG KONG LEYUZHEN TECHNOLOGY
CO., LIMITED,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED IN SCHEDULE “A” HERETO,

Defendants.

Case No. 1:24-cv-12324-JJT-LKM

Honorable Judge John J. Tharp, Jr.

Magistrate Laura K. McNally

**PLAINTIFF’S MOTION TO EXCEED PAGE LIMITATION FOR MEMORANDUM IN
SUPPORT OF PLAINTIFF’S MOTION FOR ENTRY OF A TEMPORARY
RESTRAINING ORDER**

Plaintiff Hong Kong Leyuzhen Technology Co., Limited (“Plaintiff”), by and through its counsel, the Bayramoglu Law Offices, LLC, and pursuant to Local Rule 7.1 of the United States District Court for the Northern District of Illinois, respectfully requests that it be given leave to file their brief in support of Plaintiff’s *Ex Parte* Motion for Entry of a Temporary Restraining Order (the “*Ex Parte* Motion”) against the Defendants listed in Schedule A attached as Exhibit 2 to the Complaint (the “Defendants”) which is in excess of 15 pages in length.

As part of the *Ex Parte* Motion Plaintiff seeks: (1) entry of a temporary restraining order against Defendants enjoining them from the manufacture, importation, distribution, offering for sale, and sale of knockoff products that display or otherwise use, without authorization the copyrights asserted in this action, which are federally registered marks as set forth in Exhibit 1 to the Complaint; (2) a temporary restraining order prohibiting the transfer of Defendants’ assets to preserve Plaintiff’s right to an equitable accounting; (3) expedited discovery allowing Plaintiff to inspect and copy Defendants’ records related to the manufacture, distribution, offering for sale,

and sale of knockoff products that have used, without authorization, the copyrights asserted in this action, and Defendants' financial accounts – which additionally includes discovery on any third parties acting in concert with or associated with Defendants; and (4) service by electronic mail and/or electronic publication.

Plaintiff's *Ex Parte* Motion for TRO includes multiple, distinct issues regarding its intellectual property rights, its likelihood of success on multiple claims for relief, and additional arguments concerning expedited discovery and alternative services means, each of which must be decided simultaneously. As a result, Plaintiff's brief contains necessary substantive content relevant to each issue that should be considered. Plaintiff's brief is approximately 30 pages, which is substantially less than the 60-page limit allowed if multiple required motions were filed separately. Plaintiff, therefore, respectfully requests that it be granted leave to file a combined brief in excess of 15 pages, for purposes of efficiency.

Dated: December 5, 2024

Respectfully Submitted

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