

**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-JTT-LKM

Honorable Judge John J Tharp, Jr.

Magistrate Laura K. McNally

**DECLARATION OF JILLIAN SULLIVAN IN SUPPORT OF PLAINTIFF’S
MOTION FOR TEMPORARY RESTRAINING ORDER**

I, JILLIAN SULLIVAN, of the City of Chicago, in the State of Illinois, declare as follows:

1. Except as otherwise expressly stated to the contrary, this declaration is based upon my personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the statements made herein.

2. I make this declaration in support of Plaintiff’s Motion for Temporary Restraining Order, including a temporary injunction, a temporary asset restraint, expedited discovery, and service of process by email and/or electronic publication (the “Motion”).

3. On October 30, 2024, and on October 31, 2024, I placed product orders on temu.com (the “Platform”). These purchases made by me from the online marketplace storefronts maintained on the Platform (the “Online Marketplaces”) by the named Schedule “A” Defendants (the “Defendants”) in this action. Moreover, each of the foregoing purchases were made because the Online Marketplaces were using Plaintiff’s federally registered copyright (the “Brand

Copyright”) to promote, advertise, market, distribute, offer for sale, and sell knockoff products, including women’s clothing, merchandise, and related items, (the “Infringing Products”).

4. The Infringing Products purchased on October 30 and October 31, 2024 have since shipped to the State of Illinois and the City of Chicago. All Infringing Products ordered by me are sold by the Defendants in this action.

5. A review of Defendants’ product listings as of the date of filing this declaration, the Infringing Products remain available for purchase on Defendants’ Online Marketplaces and the Defendant are actively representing they are ready, willing, and able to sell, using the Brand Trademark without authorization, the Counterfeit Products and ship them to consumers in the State of Illinois by the items to be added to online carts selecting shipment Illinois.

6. All purchased Infringing Products have resulted in completed sales transactions, which includes payment being made. To the extent the Court requires physical proof that I have received the purchased products in the State of Illinois, City of Chicago, I am willing to supplement this declaration with photographic evidence of my receipt of same.

I declare under penalty of perjury under the laws of the United States of America the foregoing is true and correct.

Executed on December 4, 2024 in Chicago, Illinois.

Respectfully Submitted

By: /s/ Jillian Sullivan
JILLIAN SULLIVAN