

**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

Honorable John J. Tharp Jr.

**PLAINTIFF'S SUPPLEMENT TO 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, submits this Supplement in support of its *Ex Parte* Motion for Entry of a Temporary Restraining Order, including a temporary injunction, a temporary asset restraint, expedited discovery, and service of process by e-mail and/or electronic publication (the "Supplement"), and pursuant to the Court's December 6, 2024, Minute Order [Dkt. No. 12].

INTRODUCTION

Plaintiff initiated this lawsuit on November 27, 2024, which included its initial Complaint for Copyright infringement and Plaintiff's motion for a temporary restraining order [Dkt. Nos. 1, 10]. On December 6, 2024, this Court issued Docket Entry 12 stating that the plaintiff is required to supplement its motion with: (1) a listing of all prior online trademark, copyright, or patent infringement cases (also known as "Schedule A" cases) filed in any court in the United States in

which it was a plaintiff, (2) a listing of any of the defendants included in the Schedule A in this case that the plaintiff has previously named as a defendant in any prior complaint or Schedule A case, (3) a certification that the plaintiff has not used any of the screenshot evidence supplied in support or its motion in any prior proceeding, and (4) an index that, in addition to matching each defendant to the screenshots supplied in support of the motion, lists the dates those screenshots were taken, and identifies, on a defendant-by-defendant basis, the specific copyright each defendant has allegedly infringed. Plaintiff is hopeful that after reviewing the factual background provided below, the Court will be satisfied from any concerns.

I. All Prior Filed “Schedule A” Cases with the Same Plaintiff. Noted cases by specific platform and each containing limited copyrights.

(1) a listing of all prior online trademark, copyright, or patent infringement cases (also known as "Schedule A" cases) filed in any court in the United States in which it was a Plaintiff.		
Plaintiff	Case	Court
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-00333-NLM Copyright Infringement Mixed Platforms	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-01547-ARW-JC Copyright Infringement eBay Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-01652-JCD-KLHH Copyright Infringement Walmart Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-01689-ARW-JC Copyright Infringement Temu Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-01705-JIC-BWJ Copyright Infringement Aliexpress Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-01807-VMK-GAF Copyright Infringement Alibaba Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-02809-JCD-MV Copyright Infringement Aliexpress Platform	Northern District of Illinois

(1) a listing of all prior online trademark, copyright, or patent infringement cases (also known as "Schedule A" cases) filed in any court in the United States in which it was a Plaintiff.		
Plaintiff	Case	Court
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-02825-EEB-SMF Copyright Infringement Independent Websites	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-02910-SCS-MDW Copyright Infringement Amazon Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-02939-MFK-BWJ Copyright Infringement Amazon Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-03191-VMK-GAF Copyright Infringement Aliexpress Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-03210-MMP-SMF Copyright Infringement Amazon Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-04067-LAH-JC Copyright Infringement Aliexpress Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-06226-GNA-YBK Copyright Infringement Temu Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-07059-MFK-JTG Copyright Infringement eBay Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-07262-JIC-JC Copyright Infringement Temu Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-07702-LCJ-SMF Copyright Infringement Aliexpress Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-08856-MFK-MDW Copyright Infringement Temu Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-12324-JJT-LKM Copyright Infringement Temu Platform	Northern District of Illinois
Hong Kong Leyuzhen Technology Co. Limited	1:24-cv-12600-SLE-KLHH Copyright Infringement eBay Platform	Northern District of Illinois

II. All previously named as a defendant in any prior complaint or “Schedule A” case that have previously been named in other cases.

Please refer to **Exhibit A** to the Supplement which lists any of the defendants included in Schedule A in this case that the Plaintiff has previously named as a defendant in any prior complaint or Schedule A case.

III. Plaintiff’s Certification

I, Shawn A. Mangano, hereby certify under penalty of perjury that the screenshot evidence submitted in support of the current motion for a temporary restraining order has not been used in any prior proceeding.

Executed on this 13th of December 2024.

By: /s/ *Shawn A. Mangano*

~~Shawn A. Mangano (Bar No. 6299408)~~

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Attorney for Plaintiff

IV. Index of Screenshots

Please refer to **Exhibit A** to the Supplement that matches each defendant to the screenshots supplied in support of the motion, lists the dates those screenshots were taken, and identifies, on a defendant-by-defendant basis, the specific copyright each defendant has allegedly infringed .

CONCLUSION

For the foregoing reasons, Plaintiff respectfully submits that it has fully addressed all concerns set forth by the Court in its December 6, 2024, Minute Order [Dkt. No. 12]. To the extent

the Court requires additional information or asks that further steps be taken to address its concerns, Plaintiff stands ready, willing, and able to do so on an expedited basis.

DATED: December 13, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano

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