

**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 John J. Tharp Jr.

Magistrate Judge Laura K. McNally

**MEMORANDUM IN SUPPORT OF PLAINTIFF’S
MOTION TO EXTEND TEMPORARY RESTRAINING ORDER**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd, (“Plaintiff”), by and through its counsel, the Bayramoglu Law Offices, LLC, submits this Memorandum in Support of its Motion to Extend Temporary Restraining Order (the “Motion”). In support The Motion, Plaintiff states as follows:

Plaintiff seeks extension of the Temporary Restraining Order (“TRO”) issued by this Court on December 16, 2024 [Dkt. No. 15] to provide the designated third-party online sales platform (the “Platform”) to comply with the TRO’s requirements and respond to the associated subpoena. (Mangano Decl. ¶ 6.) Absent this information, Plaintiff cannot effectuate electronic service of process on the named Schedule “A” Defendants (the “Defendants”) as authorized by the TRO. (*Id.* ¶ 8.) This is Plaintiff’s first request for an extension of the TRO. (*Id.* ¶ 6.)

Pursuant to Fed. R. Civ. P. Rule 65(b), the Court may extend a temporary restraining order for a period not to exceed fourteen (14) days upon a showing of good cause. Fed.R.Civ.P. 65(b).

This Court and other courts in the Seventh Circuit have found good cause to extend a TRO where service and expedited discovery responses from third-party platforms remain pending. *See H-D Michigan, LLC v. Hellenic Duty Free Shops S.A.*, No. 2:11-CV-00742, 2011 WL 4368418, at *1 (E.D. Wis. Sept. 19, 2011) (the court granted motion to extend temporary restraining order to effectuate service); *loanDepot.com, LLC v. Schneider*, 647 F. Supp. 3d 620, 627 (N.D. Ill. 2022) (granting extensions of temporary restraining order for expedited discovery).

In this case, Plaintiff has worked diligently to serve the TRO and the associated subpoena on the Platform. (Mangano Decl. ¶ 6.) Plaintiff has served the TRO and associated subpoena on the Platform’s legal@temu.com email. (*Id.*) The Platform acknowledged receipt of the TRO and associated subpoena on December 17, 2024, but requested additional information to comply with their requirements. (*Id.* ¶ 7.)

Absent an extension of the TRO so that the Platform can comply with its requirements, Plaintiff cannot effectuate electronic service of process authorized by the Court. (*Id.* ¶ 8.) Moreover, absent an extension of the TRO, Plaintiff is exposed to immediate and continuing irreparable harm because Defendants would likely learn of these proceedings, abandon their storefronts on third-party platforms, transfer their assets to offshore accounts outside of the jurisdiction of this Court, and frustrate Plaintiff’s ability to obtain its requested relief. (*Id.*) Furthermore, these circumstances demonstrate “good cause” for the requested 14-day extension under Federal Rule of Civil Procedure 65(b). (*Id.*)

For the foregoing reasons, Plaintiff respectfully requests that the TRO [Dkt. No. 15] be extended for a period of fourteen (14) days up to and including January 13, 2025.

DATED: December 23, 2024

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (Bar No. 6299408)

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