

**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

**DECLARATION OF SHAWN A. MANGANO, ESQ. IN SUPPORT OF PLAINTIFF’S
MOTION TO EXTEND TEMPORARY RESTRAINING ORDER**

I, Shawn A. Mangano, of the City of Las Vegas, in the State of Nevada, 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 to Extend the Temporary Restraining Order (the “Motion”).
3. I am an attorney at law, duly admitted to practice before the Courts of the State of Illinois and the United States District Court for the Northern District of Illinois. I am the lead attorney for Plaintiff Hong Kong Leyuzhen Technology Co. Ltd. (“Plaintiff”). I make this declaration from my matters within my own knowledge unless stated otherwise.

4. Plaintiff filed its Motion for Temporary Restraining Order including a Temporary Injunction, a Temporary Asset Restraint, Expedited Discovery, and Service of Process by E-Mail and/or Electronic Publication on December 5, 2024 [Dkt. No. 10].

5. The Court granted Plaintiff's motion and issued a signed Temporary Restraining Order (the "TRO") on December 16, 2024 [Dkt. No. 15], which is effective for a period of fourteen (14) days and is set to expire on December 30, 2024. This is Plaintiff's first request for an extension of the TRO.

6. Since entry of the TRO, Plaintiff has been working diligently to effectuate service on the designated third-party online sales platform (the "Platform"). These efforts include serving the Platform's designated TRO email address legal@temu.com.

7. The Platform acknowledged receipt of the TRO and the associated subpoena via email on December 17, 2024, but requested more information before they would process the remaining expedited discovery requested.

8. Without an extension of the TRO so that the Platform can have additional time to comply with the TRO and the associated subpoena, Plaintiff is unable to effectuate electronic service on the named Schedule "A" Defendants (the "Defendants") as authorized by the Court. Moreover, an extension of the TRO so that the Platform can comply with its requirements, there is a high probability that the Defendants will learn of these proceedings, close their seller accounts, and transfer their assets to offshore bank accounts outside of the jurisdiction of this Court. This would subject Plaintiff to immediate and continuing irreparable harm. Moreover, these circumstances justify "good cause" for extending the TRO under Federal Rule of Civil Procedure 65(b).

9. For the foregoing reasons, and the reasons stated in Plaintiff's Memorandum in Support of the Motion for TRO [Dkt. No. 10], there is a high probability that Plaintiff will suffer immediate and irreparable injury, loss, or damage if the TRO is not extended.

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

Executed on December 23, 2024, in Las Vegas, Nevada.

Respectfully Submitted,

By: /s/ Shawn A. Mangano
SHAWN A. MANGANO, ESQ.