

**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

**PLAINTIFF’S FIRST MOTION TO EXTEND THE
TEMPORARY RESTRAINING ORDER**

Plaintiff Hong Kong Leyuzhen Technology Co. Ltd., (“Plaintiff”), by and through its counsel, the Bayramoglu Law Offices, LLC, submits this motion (the “Motion”) to extend the Temporary Restraining Order (“TRO”), entered by this Court on December 16, 2024 [Dkt. No. 15], which is set to expire on December 30, 2024, for an additional period of fourteen (14) days up to and including January 13, 2025. This is Plaintiff’s first request for an extension of the TRO. Plaintiff’s application is based upon this Motion, the memorandum in support the motion, the Declaration of Shawn A. Mangano (the “Mangano Decl.”) filed herewith, together with any argument of counsel entertained by the Court.

Since entry of the TRO, Plaintiff has been diligently working to effectuate service and ensure compliance with the TRO’s terms by the designated Temu third-party platform (the “Platform”). In particular, Plaintiff has electronically served legal@temu.com and has received a

response from the Platform. Plaintiff has served the third-party provider with the TRO and the associated subpoena, which requests information concerning the email addresses for the named Schedule “A” Defendants (the “Defendants”) in order to effectuate electronic service of process that has been authorized by the Court in the TRO, together with preventing Defendants from abandoning and/or transferring their online stores and move their assets to offshore accounts. Plaintiff respectfully requests the Court to extend the TRO to provide the Platform with additional time to comply with the terms of the TRO and the related subpoena.

Absent an extension of the TRO, there is significant risk that Defendants will transfer assets from their U.S.-based financial accounts to offshore accounts, modify the names of their internet stores, remove their internet stores from their current platform, and other conduct described in Plaintiff’s Motion for a Temporary Restraining Order [Dkt. No. 10]. As such, the probability of harm irreparable to Plaintiff absent extension of the TRO is significant and continuing. Moreover, these circumstances clearly demonstrate “good cause” required for the requested extension of the TRO under Federal Rule of Civil Procedure 65(b).

Based on the foregoing, 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
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CERTIFICATE OF SERVICE

I hereby certify that on the 23rd day of December 2024, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Illinois, Eastern Division, using the electronic case filing system. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. Notice of this filing is provided to unrepresented parties for whom contact information has been provided via email and by posting the filing on a URL contained on our website blointernetenforcement.com.

By: /s/ Shawn A. Mangano
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