

**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 Laura K. McNally**

DECLARATION OF JOSEPH DROTER PURSUANT TO MINUTE ORDER 23

Pursuant to the Honorable John J. Tharp Jr.’s Minute Order (Dkt. No. 23), I, Joseph Droter, declare under the penalty of perjury under the laws of the United States that the following contents of this Declaration are true and accurate. If called upon, I am competent to testify as to the matters contained in this Declaration.

1. I am an attorney licensed to practice law in the state of Illinois and I am admitted to practice before Court. I am an attorney-at-law in the law firm Bayramoglu Law Offices, LLC where I practice primarily intellectual property law including patents, trademarks, and copyrights. I am representing Plaintiff Hong Kong Leyuzhen Technology Co. Limited (“Plaintiff”) in this matter.

2. On January 8, 2025 Plaintiff filed a Motion for Preliminary Injunction (the “Motion”) (Dkt. No. 24). Plaintiff subsequently filed a Declaration of L. Li in Support of the Motion for Preliminary Injunction (the “Li Decl.”) fourteen minutes after the Motion (Dkt. No. 25). Pursuant to the Motion’s Certificate of Service, the Motion with all supporting documents

including the Li Decl. was served via Blind Carbon Copy to maintain privacy on all Defendants listed in the Schedule “A”. Attached as **Exhibit A** is a true and correct copy of the service email and time stamped five minutes after the Li Decl. was filed.

3. On January 10, 2025 the Honorable Tharp issued a Minute Entry directing Plaintiff to (1) publish the Motion on a website with prominent text advising defendants that: “A motion for entry of preliminary injunction has been filed and that any responses or objections to that motion must be filed before 1/13/2025.” (2) Plaintiff must “also provide to each defendant the screenshot evidence of the allegedly infringing product(s) offered and sold” by Defendants that Plaintiff provided in support of its Temporary Restraining Order and Motion. (3) Plaintiff must supplement its certificate of service by identifying the email addresses it used to serve Defendants (the “Minute Entry”) (Dkt. No. 26).

4. On January 10, 2025, Plaintiff complied with the Minute Entry and served via electronic mail the (1) Minute Entry and (2) Evidence of Infringement with the date for Defendants to object or respond prominently placed in the body of the email and provided a link to a website to access the case related documents. As an additional courtesy, Plaintiff re-served the Motion (Dkt. No. 24). Attached as **Exhibit B** is a true and correct copy of the service email.

5. Attached as **Exhibit C** is a true and correct copy of Plaintiff’s website URL: <https://blointernetenforcement.com/case-no-124-cv-12324/> which shows Plaintiff’s Motion for Preliminary Injunction, the Minute Entry with clear and prominent display of Defendants Response date, and the Evidence of Infringement.

///

///

6. Attached as **Exhibit D** is a true and correct copy of the Schedule A Defendants' email addresses Plaintiff used to serve the Motion for Preliminary Injunction, Minute Entry and Evidence of Infringement.

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

DATED AND SIGNED this 10th day Of January, 2025.

Respectfully submitted,

By: /s/ Joseph W. Droter

Joseph W. Droter (IL Bar No. 6329630)

BAYRAMOGLU LAW OFFICES LLC

1540 West Warm Springs Road Ste. 100

Henderson, NV 89014

Tel: (702) 462-5973 | Fax: (702) 553-3404

joseph@bayramoglu-legal.com

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 10th day of January 2025, 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 (the “ECF”) system. Notice of this filing is provided to unrepresented parties for whom contact information is listed below and has been provided via email and by posting the filing on a URL contained on our website <http://blointernetenforcement.com>, and a link to said website in the email provided by third party, AliExpress.

By: /s/ Joseph W. Droter

Joseph W. Droter (IL Bar No. 6329630)

BAYRAMOGLU LAW OFFICES LLC