

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

XYZ Corporation,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED IN
SCHEDULE "A" HERETO

Defendants.

Case No. 1:24-cv-12483

**PLAINTIFF'S MOTION TO EXCEED PAGE LIMITATION IN PLAINTIFF'S MOTION
FOR ENTRY OF A TEMPORARY RESTRAINING ORDER**

Plaintiff, XYZ Corporation, ("Plaintiff"), by and through its counsel, the Bayramoglu Law Offices, LLC, and pursuant to Local Rule 7.1 of the United States District Court for the Northern District of Illinois, respectfully requests that it be given leave to file their brief in support of Plaintiff's Motion for Entry of a Temporary Restraining Order (the "Motion") against the Defendants described in Schedule attached as Exhibit 2 to the Complaint (the "Defendants") which is in excess of 15 pages in length.

As part of the Motion Plaintiff seeks: (1) entry of a temporary restraining order against Defendants enjoining them from the manufacture, importation, distribution, offering for sale, and sale of knockoff and/or counterfeit products that display or otherwise use, without authorization the trademark asserted in this action, which is a federally registered mark described in Exhibit 1 to the Complaint; (2) a temporary restraining order prohibiting the transfer of Defendants' assets to preserve Plaintiff's right to an equitable accounting; (3) expedited discovery allowing Plaintiff to inspect and copy Defendants' records related to the manufacture, distribution, offering for sale,

and sale of knockoff products that have used, without authorization, the copyrights asserted in this action, and Defendants' financial accounts – which additionally includes discovery on any third parties acting in concert with or associated with Defendants; and (4) service by electronic mail and/or electronic publication.

Plaintiff's Motion for TRO includes at least four (4) distinct issues regarding its intellectual property rights, its likelihood of success on multiple claims for relief, and additional arguments concerning expedited discovery and alternative services means, each of which must be decided simultaneously. As a result, Plaintiff's brief contains necessary substantive content relevant to each issue that should be considered. Plaintiff's brief is approximately 20 pages, which is substantially less than the 60-page limit allowed if multiple required motions were filed separately. Plaintiff, therefore, respectfully requests that it be granted leave to file a combined brief in excess of 15 pages, for purposes of efficiency.

DATED: December 4, 2024

Respectfully Submitted,

By: /s/ Shawn A. Mangano
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