

**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

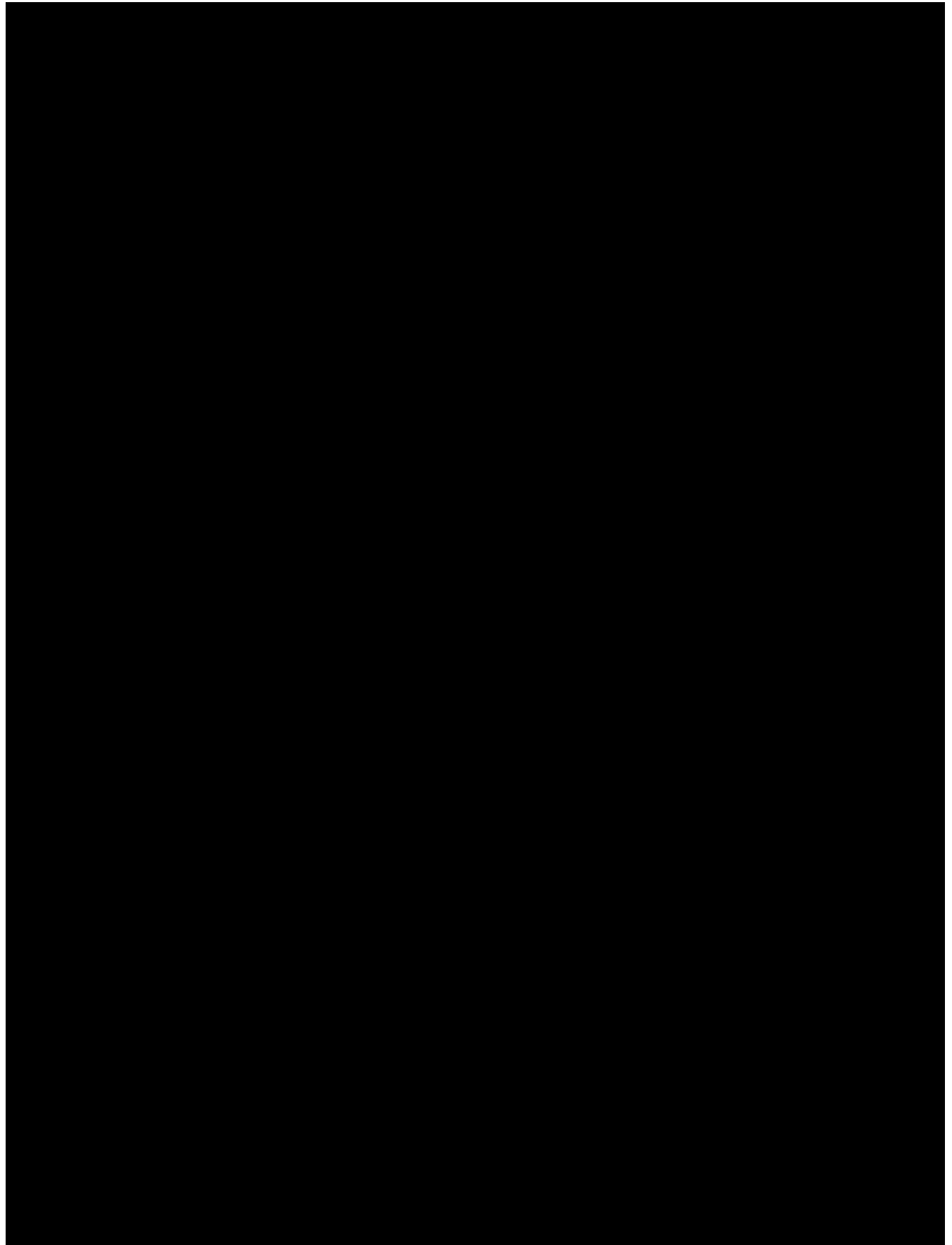
**DECLARATION OF JILLIAN SULLIVAN IN SUPPORT OF PLAINTIFF'S
MOTION FOR TEMPORARY RESTRAINING ORDER**

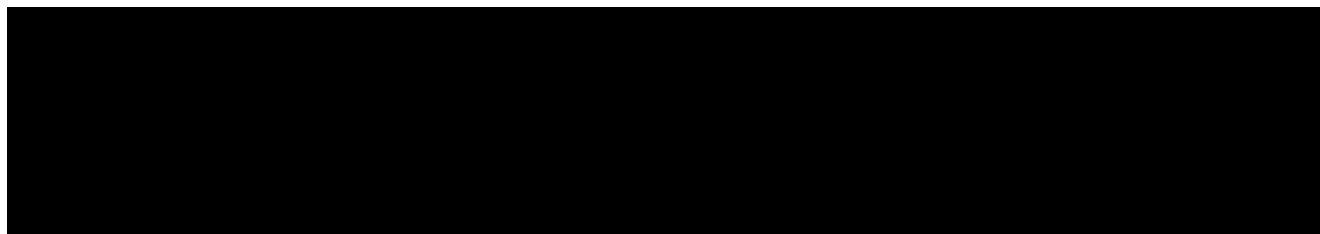
I, JILLIAN SULLIVAN, of the City of Chicago, in the State of Illinois, declare as follows:

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 for Temporary Restraining Order, including a temporary injunction, a temporary asset restraint, expedited discovery, and service of process by email and/or electronic publication (the "Motion").

3. On September 27, 2024, and on October 16, 2024, I placed product orders on Amazon.com (the "Platform") with order numbers to product titles as outlined in the table below:





The foregoing table represents a true and accurate summary of purchases made by me from the online marketplace storefronts maintained on the Platform (the “Online Marketplaces”) by the named Schedule “A” Defendants (the “Defendants”) in this action. Moreover, each of the foregoing purchases were made because the Online Marketplaces were using Plaintiff’s federally registered trademark (the “Brand Trademark”) to promote, advertise, market, distribute, offer for sale, and sell knockoff products, including women’s clothing, merchandise, and related items, (the “Counterfeit Products”).

4. As outlined in the table above, all Counterfeit Products purchased on September 27, 2024 have since shipped to the State of Illinois and the City of Chicago. The Counterfeit Products purchased on October 16, 2024 have an estimated delivery date ranging from October 19, 2024 to November 7, 2024. All Counterfeit Products ordered by me are sold by the Defendants in this action. Attached as Exhibit “1” is a true and correct copies of screenshots of the order confirmations and shipping confirmations, which indicate the product will be shipped to the State of Illinois, City of Chicago.

5. A review of Defendants’ product listings as of the date of filing this declaration, the Counterfeit Products remain available for purchase on Defendants’ Online Marketplaces and the Defendant are actively representing they are ready, willing, and able to sell, using the Brand Trademark without authorization, the Counterfeit Products and ship them to consumers in the State of Illinois by the items to be added to online carts selecting shipment Illinois.

6. All purchased Counterfeit Products have resulted in completed sales transactions, which includes payment being made. To the extent the Court requires physical proof that I have received the purchased Counterfeit Products in the State of Illinois, City of Chicago, I am willing to supplement this declaration with photographic evidence of my receipt of same.

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

Executed on December 4, 2024 in Chicago, Illinois.

Respectfully Submitted

By: /s/ Jillian Sullivan

JILLIAN SULLIVAN