

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

HONG KONG YU'EN E-COMMERCE 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-12483-EEB-MDW

**Honorable Judge Elaine E. Bucklo
Magistrate M. David Weisman**

HEARING DATE: January 15, 2025
HEARING TIME: 9:45 AM
COURTROOM: 2243

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S MOTION TO EXTEND
TEMPORARY RESTRAINING ORDER**

Plaintiff Hong Kong Yu'En E-Commerce Co. Limited, ("Plaintiff"), by and through its counsel, the Bayramoglu Law Offices, LLC, submits this Memorandum in Support of its Motion to Extend Temporary Restraining Order (the "Motion"). In support of the Motion, Plaintiff states as follows:

Plaintiff seeks extension of the Temporary Restraining Order ("TRO") issued by this Court on December 26, 2024 [Dkt. No. 23] to provide the Defendants listed in Schedule A time to respond after receiving notice of this lawsuit and respond to the complaint while keeping the status quo. (Mangano Decl. ¶ 9.) Absent this additional time, the named Schedule "A" Defendants (the "Defendants") will not have enough notice to respond prior to the current expiration of the TRO. (*Id.*) This is Plaintiff's first request for an extension of the TRO. (*Id.* ¶ 5.)

Pursuant to Fed. R. Civ. P. Rule 65(b), the Court may extend a temporary restraining order for a period not to exceed fourteen (14) days upon a showing of good cause. Fed.R.Civ.P. 65(b).

This Court and other courts in the Seventh Circuit have found good cause to extend a TRO where service and expedited discovery responses from third-party platforms remain pending. *See H-D Michigan, LLC v. Hellenic Duty Free Shops S.A.*, No. 2:11-CV-00742, 2011 WL 4368418, at *1 (E.D. Wis. Sept. 19, 2011) (the court granted motion to extend temporary restraining order to effectuate service); *loanDepot.com, LLC v. Schneider*, 647 F. Supp. 3d 620, 627 (N.D. Ill. 2022) (granting extensions of temporary restraining order for expedited discovery).

In this case, Plaintiff has worked diligently to serve the TRO and the associated subpoena on the Platform, Amazon. (Mangano Decl. ¶ 6.) Plaintiff also has out for personal service on the Platform’s U.S. entity, Amazon.com at its Registered Agent and has emailed these materials to the Platform’s designated TRO response email tro-notices@amazon.com on December 26, 2024. (*Id.*) The Platform acknowledged receipt of the TRO and associated subpoena on December 27, 2024, and was able to provide the Defendants contact information on January 2, 2025. (*Id.* ¶ 7)

An extension of the TRO is necessary so that Plaintiff can effectuate electronic service of process authorized by the Court, provide Defendants enough time to respond to the complaint and TRO, as well as notice of Plaintiff’s anticipated motion to enter preliminary injunction. (*Id.* ¶ 8-9.) Moreover, absent an extension of the TRO, Plaintiff is exposed to immediate and continuing irreparable harm because Defendants would likely learn of these proceedings, abandon their storefronts on third-party platforms, transfer their assets to offshore accounts outside of the jurisdiction of this Court, and frustrate Plaintiff’s ability to obtain its requested relief. (*Id.*) Furthermore, these circumstances demonstrate “good cause” for the requested 14-day extension under Federal Rule of Civil Procedure 65(b). (*Id.*)

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For the foregoing reasons, Plaintiff respectfully requests that the TRO [Dkt. No. 23] be extended for a period of fourteen (14) days up to and including January 23, 2025.

DATED: January 9, 2025

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn A. Mangano (IL Bar No. 6299408)

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CERTIFICATE OF SERVICE

I hereby certify that on the 9th 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 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 <http://blointernetenforcement.com>, and distributed to ecommerce platform, Amazon.

Respectfully submitted,

By: /s/ Shawn A. Mangano
Shawn A. Mangano (IL Bar No.6299408)
BAYRAMOGLU LAW OFFICES LLC