

**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

PLAINTIFF'S MOTION FOR PRELIMINARY INJUNCTION

Plaintiff HONG KONG YU'EN E-COMMERCE CO. LIMITED, ("Plaintiff") hereby moves this Honorable Court for entry of a Preliminary Injunction (the "Motion"). The scope of the requested Preliminary Injunction is substantially identical to the Temporary Restraining Order (the "TRO") entered December 26, 2024. [Dkt. No. 23]. On January 3, 2024, Plaintiff effectuated electronic service of process on the named Schedule "A" Defendants for which the Amazon online sales platform provided email addresses [Dkt. No. 29], and the First Amended Complaint on January 6, 2025 [Dkt. No. 30]. Accordingly, Plaintiff's Motion, for which notice will be provided, is properly submitted to the Court on a non-*ex parte* basis.

To the extent the Motion is not adjudicated prior to expiration of the TRO, on January 9, 2025, Plaintiff respectfully requests that its currently entered TRO and pending application for preliminary injunctive relief be converted to a preliminary injunction because the time for extending the TRO exceeds that authorized under Federal Rule of Civil Procedure 65(b). *See H-D Mich., LLC v. Hellenic Duty Free Shops S.A.*, 694 F.3d 827, 843-45 (7th Cir. 2012).

Plaintiff's Motion is made and based on the accompanying Memorandum of Law in Support of Plaintiff's Motion for Preliminary Injunction, the Declaration of Shawn M. Mangano, Esq. (the "Mangano Decl."), the Declaration of En Fang (the "Fang Decl."), and any arguments of counsel entertained by the Court.

DATED: January 9, 2025

Respectfully submitted,

By: /s/ Shawn A. Mangano

Shawn. A. Mangano (IL Bar No. 6299408)

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Attorneys for Plaintiff

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