

EXHIBIT H

**United States District Court
Northern District of Illinois - CM/ECF NextGen 1.8 (rev. 1.8.3) (Chicago)
CIVIL DOCKET FOR CASE #: 1:24-cv-11029**

Hong Kong Yu'En E-Commerce Co. Limited v. USA 1ST Store (Zando Exclusive Agency), a Chinese Entity
Assigned to: Honorable Jeremy C. Daniel
Cause: 15:1114 Trademark Infringement

Date Filed: 10/25/2024
Jury Demand: Both
Nature of Suit: 840 Trademark
Jurisdiction: Federal Question

Plaintiff

XYZ Corporation
TERMINATED: 11/08/2024

represented by **Shawn Anthony Mangano**
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TERMINATED: 01/31/2025
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Plaintiff

HONG KONG YUEN E-COMMERCE CO. LTD.

represented by **Shawn Anthony Mangano**
(See above for address)
TERMINATED: 01/31/2025
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V.

Defendant

The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified in Schedule A Hereto
TERMINATED: 11/08/2024

Defendant

USA 1St Store (Zando Exclusive Agency)

represented by **Ruoting Men**
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Date Filed	#	Docket Text
10/25/2024	<u>1</u>	COMPLAINT <i>for Trademark Infringement</i> filed by XYZ Corporation; Jury Demand. Filing fee \$ 405, receipt number AILNDC-22656460. (Attachments: # <u>1</u> Exhibit 1 to the Complaint, # <u>2</u> Exhibit 2 to the Complaint, # <u>3</u> Exhibit 3 to the Complaint, # <u>4</u> Exhibit 4 to the Complaint, # <u>5</u> Exhibit 5 to the Complaint, # <u>6</u> Exhibit 6 to the Complaint)(Mangano, Shawn) (Entered: 10/25/2024)
10/25/2024	<u>2</u>	SEALED DOCUMENT by Defendant The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified in Schedule A Hereto <i>Sealed Complaint</i> (Attachments: # <u>1</u> Exhibit 1 to the Complaint, # <u>2</u> Exhibit 2 to the Complaint, # <u>3</u> Exhibit 3 to the Complaint)(Mangano, Shawn) (Entered: 10/25/2024)
10/25/2024	<u>3</u>	CIVIL Cover Sheet (Mangano, Shawn) (Entered: 10/25/2024)
10/25/2024	<u>4</u>	ATTORNEY Appearance for Plaintiff XYZ Corporation by Shawn Anthony Mangano (Mangano, Shawn) (Entered: 10/25/2024)
10/28/2024		CASE ASSIGNED to the Honorable Jeremy C. Daniel. Designated as Magistrate Judge the Honorable Young B. Kim. Case assignment: Random assignment. (Civil Category 2). (lj,) (Entered: 10/28/2024)
10/28/2024		CLERK'S NOTICE: Pursuant to Local Rule 73.1(b), a United States Magistrate Judge of this court is available to conduct all proceedings in this civil action. If all parties consent to have the currently assigned United States Magistrate Judge conduct all proceedings in this case, including trial, the entry of final judgment, and all post-trial proceedings, all parties must sign their names on the attached Consent To form. This consent form is eligible for filing only if executed by all parties. The parties can also express their consent to jurisdiction by a magistrate judge in any joint filing, including the Joint Initial Status Report or proposed Case Management Order. (lj,) (Entered: 10/28/2024)
10/29/2024	<u>5</u>	MINUTE entry before the Honorable Jeremy C. Daniel: The plaintiff has filed a complaint alleging trademark infringement, counterfeiting, unfair competition, false designation of origin, and violations of the Illinois Uniform Deceptive Trade Practices Act against 20 defendants. (R. 1 and R. 2.) This case follows a pattern common to "Schedule A" cases where plaintiffs allege that defendants employ similar methods and "work in active concert" to infringe plaintiffs' intellectual property. But experience has shown that not all defendants named in a Schedule A case work together. More importantly, experience has shown that joinder under Fed. R. Civ. P. 20 is rarely appropriate in Schedule A cases. Accordingly, the Court raises the propriety of joinder and requires the plaintiff to file a supplemental memorandum addressing the propriety of joinder on or before November 8, 2024. Alternatively, by the same date, the plaintiff may file an amended complaint naming one or more defendants; however, if the plaintiff names multiple defendants, the plaintiff must show that joinder of those defendants is proper. Having reviewed the complaint, the Court is also concerned about certain allegations directed towards joinder. For instance, the complaint alleges that, "Upon information and belief, [d]efendants are working in active concert to knowingly and willfully manufacture, import, distribute, offer for sale, and sell Counterfeit Products in the same transaction, occurrence, or series of transactions or occurrences." (R. 1 Para. 29.) The complaint also alleges that, "[d]efendants, without any authorization of license from the Plaintiff, have jointly and severally, knowingly and willfully used and continue to use the Brand Trademark." (Id.) These are conclusory statements that do nothing to establish the propriety of joinder. Moreover, experience has shown that, while some individual defendants may operate several online stores, and while some individual defendants may coordinate with other defendants before or after the filing of the infringement action, rarely, if ever, have all defendants named in a Schedule A case worked together, let alone "jointly and severally." Fed. R. Civ. P. 11(b)(3) requires that, "factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery." Pursuant to Fed. R. Civ. P. 11(c)((3), the Court requires counsel for the plaintiff to show cause why the allegations that "defendants are working in active concert" or that defendants have done anything "jointly and severally" do not violate Rule 11(b)(3). The Court will consider the issues raised in this order first, and will hear argument on the issues raised in this order on November 12, 2024, at 9:30 a.m. Mailed notice. (vcf,) (Entered: 10/29/2024)
11/08/2024		NEW PARTIES: HONG KONG YUEN E-COMMERCE CO. LTD. and USA 1St Store (Zando Exclusive Agency) added to case caption. Terminating The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified in Schedule A Hereto and XYZ Corporation (Mangano, Shawn) (Entered: 11/08/2024)

11/08/2024	6	<i>FIRST</i> AMENDED complaint by HONG KONG YUEN E-COMMERCE CO. LTD. against USA 1St Store (Zando Exclusive Agency) (Attachments: # 1 Exhibit 1 to the Complaint, # 2 Exhibit 2 to the Complaint, # 3 Exhibit 3 to the Complaint, # 4 Exhibit 4 to the Complaint, # 5 Exhibit 5 to the Complaint, # 6 Exhibit 6 to the Complaint)(Mangano, Shawn) (Entered: 11/08/2024)
11/11/2024	7	ATTORNEY Appearance for Plaintiff HONG KONG YUEN E-COMMERCE CO. LTD. by Joseph Wendell Droter (Droter, Joseph) (Entered: 11/11/2024)
11/11/2024	8	MOTION by Plaintiff HONG KONG YUEN E-COMMERCE CO. LTD. for leave to file excess pages <i>for Plaintiff's Motion for Temporary Restraining Order</i> (Mangano, Shawn) (Entered: 11/11/2024)
11/11/2024	9	MOTION by Plaintiff HONG KONG YUEN E-COMMERCE CO. LTD. for temporary restraining order <i>INCLUDING A TEMPORARY INJUNCTION, A TEMPORARY ASSET RESTRAINT, EXPEDITED DISCOVERY, AND SERVICE OF PROCESS BY E-MAIL AND/OR ELECTRONIC PUBLICATION</i> (Attachments: # 1 Declaration of Shawn A. Mangano ISO Motion for Temporary Restraining Order)(Mangano, Shawn) (Entered: 11/11/2024)
11/11/2024	10	DECLARATION of En Fang regarding motion for temporary restraining order, 9 (Attachments: # 1 Exhibit 1 to the Declaration of En Fang ISO Motion for TRO, # 2 Exhibit 2 to the Declaration of En Fang ISO Motion for TRO) (Mangano, Shawn) (Entered: 11/11/2024)
11/11/2024	11	<i>Plaintiff's</i> NOTICE of Motion by Shawn Anthony Mangano for presentment of motion for temporary restraining order, 9 , motion for leave to file excess pages 8 before Honorable Jeremy C. Daniel on 11/12/2024 at 09:30 AM. (Mangano, Shawn) (Entered: 11/11/2024)
11/12/2024	12	DECLARATION of Jillian Sullivan regarding motion for temporary restraining order, 9 (Attachments: # 1 Exhibit 1 to the Declaration of J. Sullivan)(Mangano, Shawn) (Entered: 11/12/2024)
11/12/2024	13	MINUTE entry before the Honorable Jeremy C. Daniel: Motion hearing held. Plaintiff's motions to exceed page limitation 8 and temporary restraining order, including a temporary injunction, a temporary asset restraint, expedited discovery, and service of process by e-mail and/or electronic publication 9 are granted. For the reasons stated in open court, the rule to show cause is discharged. Plaintiff's oral motion to amend the caption of the case is granted. The Clerk is directed to amend the caption as follows: Hong Kong Yu'En E-Commerce Co. Limited v. USA 1ST Store (Zando Exclusive Agency), a Chinese Entity. Mailed notice. (vcf,) (Entered: 11/12/2024)
11/12/2024	14	SEALED TEMPORARY RESTRAINING ORDER. Signed by the Honorable Jeremy C. Daniel on 11/12/2024. Mailed notice. (vcf,) (Entered: 11/12/2024)
11/19/2024		SUMMONS Issued as to Defendant USA 1St Store (Zando Exclusive Agency) (lj,) (Entered: 11/19/2024)
11/22/2024	15	ATTORNEY Appearance for Defendant USA 1St Store (Zando Exclusive Agency) by Ruoting Men (Men, Ruoting) (Entered: 11/22/2024)
11/22/2024	16	TRANSCRIPT OF PROCEEDINGS held on 11-12-2024 before the Honorable Jeremy C. Daniel. Order Number: 50422. Court Reporter Contact Information: Krista Burgeson, krista_burgeson@ilnd.uscourts.gov. IMPORTANT: The transcript may be viewed at the court's public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through the Court Reporter/Transcriber or PACER. For further information on the redaction process, see the Court's web site at www.ilnd.uscourts.gov under Quick Links select Policy Regarding the Availability of Transcripts of Court Proceedings. Redaction Request due 12/13/2024. Redacted Transcript Deadline set for 12/23/2024. Release of Transcript Restriction set for 2/20/2025. (Burgeson, Krista) (Entered: 11/22/2024)
11/22/2024	17	MOTION by Plaintiff HONG KONG YUEN E-COMMERCE CO. LTD. to deposit funds <i>into Court Registry</i> (Attachments: # 1 Exhibit Registry Deposit Information Form)(Mangano, Shawn) (Entered: 11/22/2024)
11/22/2024	18	SUMMONS Returned Executed by HONG KONG YUEN E-COMMERCE CO. LTD. as to USA 1St Store (Zando Exclusive Agency) on 11/19/2024, answer due 12/10/2024. (Droter, Joseph) (Entered: 11/22/2024)
11/25/2024	19	MOTION by Plaintiff HONG KONG YUEN E-COMMERCE CO. LTD. for preliminary injunction (Attachments: # 1 Memorandum in Support of Motion for Preliminary Injunction, # 2 Declaration of S. Mangano in Support of Motion for Preliminary Injunction, # 3 Declaration of E. Fang in Support of Motion for Preliminary Injunction)(Mangano, Shawn) (Entered: 11/25/2024)
11/25/2024	20	NOTICE of Motion by Shawn Anthony Mangano for presentment of motion to deposit funds 17 , motion for preliminary injunction, 19 before Honorable Jeremy C. Daniel on 11/26/2024 at 09:30 AM. (Mangano, Shawn) (Entered: 11/25/2024)

11/25/2024	21	ATTORNEY Appearance for Defendant USA 1St Store (Zando Exclusive Agency) by Tao Liu (Liu, Tao) (Entered: 11/25/2024)
11/26/2024	22	MOTION by Defendant USA 1St Store (Zando Exclusive Agency) to set briefing schedule, motion for an evidentiary hearing and motion for a expedited discovery. (Men, Ruoting) (Entered: 11/26/2024)
11/26/2024	23	NOTICE of Motion by Ruoting Men for presentment of motion for miscellaneous relief 22 before Honorable Jeremy C. Daniel on 11/26/2024 at 09:30 AM. (Men, Ruoting) (Entered: 11/26/2024)
11/26/2024	24	RESPONSE by HONG KONG YUEN E-COMMERCE CO. LTD.in Opposition to MOTION by Defendant USA 1St Store (Zando Exclusive Agency) to set briefing schedule, motion for an evidentiary hearing and motion for a expedited discovery. 22 Plaintiff's Partial Opposition (Mangano, Shawn) (Entered: 11/26/2024)
11/26/2024	25	MOTION by Defendant USA 1St Store (Zando Exclusive Agency) to set briefing schedule, motion for an evidentiary hearing and motion for a expedited discovery. 22 (Mangano, Shawn) Modified on 11/27/2024 (smb,). (Entered: 11/26/2024)
11/26/2024	26	MINUTE entry before the Honorable Jeremy C. Daniel: The motion hearing set for 11/26/2024 at 9:30 a.m., will be held by Webex. At least 10 mins prior to the hearing, you are directed to cut and paste this hyper link into a browser: https://us-courts.webex.com/meet/Judge_Daniel . ALL PARTICIPANTS MUST TYPE IN THEIR NAME WHEN JOINING THE VIDEO CONFERENCE AND YOUR CAMERA MUST BE ON WHEN YOUR CASE IS CALLED. You can use the dial in option ONLY if you do not have access to a device with video capability: (650)-479-3207, the access code is: 2315 750 8728. All participants must be in a quiet area while on the line and must be muted until your case is called. Persons granted remote access to proceedings are reminded of the general prohibition against photographing, recording, and rebroadcasting of court proceedings. Violation of these prohibitions may result in sanctions, including removal of court issued media credentials, restricted entry to future hearings, denial of entry to future hearings, or any other sanctions deemed necessary by the Court. Mailed notice. (vcf,) (Entered: 11/26/2024)
11/26/2024	27	Surety BOND in the amount of \$ 5,000.00 posted by HONG KONG YUEN E-COMMERCE CO. LTD. (jcc,) (Entered: 11/26/2024)
11/26/2024	28	MINUTE entry before the Honorable Jeremy C. Daniel: Telephone hearing held. Plaintiff's oral motion to extend the TRO is denied. Motion for preliminary injunction 19 is entered and briefed as follows: response is due on or before 12/5/2024. Evidentiary hearing set for 12/12/2024 at 1:00 p.m. The parties are advised that Judge Daniel's courtroom is equipped with an integrated electronic evidence presentation system. Parties will no longer be permitted to bring their own projection or audiovisual equipment to display evidence electronically during trial. Any party desiring to use the Court's electronic evidence presentation system must confirm by emailing Judge Daniel's courtroom deputy that the person who will be operating the equipment either (1) has participated in a training session with the Systems Department, or (2) does not require training because they have used the system for a trial in this courthouse previously. Parties may arrange for training by contacting the Systems Department at (312) 435-5555. Mailed notice. (vcf,) (Entered: 11/26/2024)
12/02/2024	29	TRANSCRIPT OF PROCEEDINGS held on November 12, 2024 before the Honorable Jeremy C. Daniel. Order Number: 50422. Court Reporter Contact Information: Krista Burgeson, krista_burgeson@ilnd.uscourts.gov . IMPORTANT: The transcript may be viewed at the court's public terminal or purchased through the Court Reporter/Transcriber before the deadline for Release of Transcript Restriction. After that date it may be obtained through the Court Reporter/Transcriber or PACER. For further information on the redaction process, see the Court's web site at www.ilnd.uscourts.gov under Quick Links select Policy Regarding the Availability of Transcripts of Court Proceedings. Redaction Request due 12/23/2024. Redacted Transcript Deadline set for 1/2/2025. Release of Transcript Restriction set for 3/3/2025. (Burgeson, Krista) (Entered: 12/02/2024)
12/04/2024	30	ATTORNEY Appearance for Plaintiff HONG KONG YUEN E-COMMERCE CO. LTD. by Katherine Marilyn Kuhn (Kuhn, Katherine) (Entered: 12/04/2024)
12/05/2024	31	NOTIFICATION of Affiliates pursuant to Local Rule 3.2 by HONG KONG YUEN E-COMMERCE CO. LTD. (Mangano, Shawn) (Entered: 12/05/2024)
12/05/2024	32	STIPULATION regarding telephone conference,,,,, set motion and R&R deadlines/hearings,,,,, set/reset hearings,,,,, 28 AND REQUEST FOR EIGHT-DAY EXTENSION OF TIME TO FILE RESPONSE AND REQUEST TO STAY EVIDENTIARY HEARING IN FAVOR OF SETTLEMENT DISCUSSIONS (Mangano, Shawn) (Entered: 12/05/2024)
12/06/2024	33	MINUTE entry before the Honorable Jeremy C. Daniel: In light of the joint stipulation and request 32 , defendant's response to the plaintiff's preliminary injunction is now due on or before 12/13/2024. The evidentiary hearing set for 12/12/2024 is reset to 2/5/2025 at 10:30 a.m. Mailed notice. (vcf,) (Entered: 12/06/2024)

12/12/2024	34	STIPULATION regarding terminate hearings,, set deadlines/hearings,, set motion and R&R deadlines/hearings, 33 <i>Extend Defendant's response to 12/20/2024</i> (Men, Ruoting) (Entered: 12/12/2024)
12/13/2024	35	MINUTE entry before the Honorable Jeremy C. Daniel: The Court views the parties' stipulation 34 as a motion to extend. The defendant's response is now due on or before December 20, 2024. In the future, the parties shall file the appropriate motion when seeking relief from the Court. Mailed notice. (vcf,) (Entered: 12/13/2024)
12/20/2024	36	STIPULATION <i>REQUEST FOR EXTENSION OF TIME TO FILE RESPONSE ON JANUARY 7, 2025</i> (Men, Ruoting) (Entered: 12/20/2024)
12/23/2024	37	MINUTE entry before the Honorable Jeremy C. Daniel: The Court grants the parties' motion for an extension of time to file a response 36 . The defendant must respond on or before January 7, 2025. The Court will not move the date for the evidentiary hearing, which remains February 5, 2025. Mailed notice (cc,) (Entered: 12/23/2024)
12/27/2024	38	ANNUAL REMINDER: Pursuant to Local Rule 3.2 (Notification of Affiliates) , any nongovernmental party, other than an individual or sole proprietorship, must file a statement identifying all its affiliates known to the party after diligent review or, if the party has identified no affiliates, then a statement reflecting that fact must be filed. An affiliate is defined as follows: any entity or individual owning, directly or indirectly (through ownership of one or more other entities), 5% or more of a party. The statement is to be electronically filed as a PDF in conjunction with entering the affiliates in CM/ECF as prompted. As a reminder to counsel, parties must supplement their statements of affiliates within thirty (30) days of any change in the information previously reported. This minute order is being issued to all counsel of record to remind counsel of their obligation to provide updated information as to additional affiliates if such updating is necessary. If counsel has any questions regarding this process, this LINK will provide additional information. Signed by the Honorable Virginia M. Kendall on 12/27/2024: Mailed notice. (tg,) (Entered: 01/01/2025)
01/08/2025	39	RESPONSE by USA 1St Store (Zando Exclusive Agency)in Opposition to MOTION by Plaintiff HONG KONG YUEN E-COMMERCE CO. LTD. for preliminary injunction 19 (Attachments: # 1 Exhibit USPTO publication, # 2 Declaration Decl. of Li, # 3 Exhibit Screenshot, # 4 Exhibit The 105 product listing)(Men, Ruoting) (Entered: 01/08/2025)
01/29/2025	40	NOTICE by USA 1St Store (Zando Exclusive Agency) re response in opposition to motion, 39 <i>Notice of Errata</i> (Attachments: # 1 Errata 39-2 Decl. of Li, # 2 Errata 39-4 105 Asins)(Men, Ruoting) (Entered: 01/29/2025)
01/30/2025	41	MOTION by Attorney Shawn A. Mangano to withdraw as attorney for HONG KONG YUEN E-COMMERCE CO. LTD.. No party information provided (Mangano, Shawn) (Entered: 01/30/2025)
01/30/2025	42	NOTICE of Motion by Katherine Marilyn Kuhn for presentment of (Kuhn, Katherine) (Entered: 01/30/2025)
01/31/2025	43	MINUTE entry before the Honorable Jeremy C. Daniel: The evidentiary hearing set for 2/5/2025 is reset to 2/12/2025 at 10:00 a.m. Mailed notice. (vcf,) (Entered: 01/31/2025)
01/31/2025	44	MINUTE entry before the Honorable Jeremy C. Daniel: Motion for leave withdraw 41 is granted. The motion hearing set for 2/4/2025 is stricken. Mailed notice. (vcf,) (Entered: 01/31/2025)
02/07/2025	45	MOTION by Plaintiff HONG KONG YUEN E-COMMERCE CO. LTD. to continue <i>EVIDENTIARY HEARING FOR THIRTY DAYS [Unopposed]</i> (Kuhn, Katherine) (Entered: 02/07/2025)
02/07/2025	46	NOTICE of Motion by Katherine Marilyn Kuhn for presentment of motion to continue 45 before Honorable Jeremy C. Daniel on 2/12/2025 at 09:30 AM. (Kuhn, Katherine) (Entered: 02/07/2025)
02/10/2025	47	MINUTE entry before the Honorable Jeremy C. Daniel: Plaintiff's unopposed motion to continue 45 is granted. The Evidentiary Hearing set for 2/12/2025 is reset to 3/5/2025 at 10:00 a.m. The motion hearing is stricken. Mailed notice. (vcf,) (Entered: 02/10/2025)

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