

EXHIBIT K



Re: Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

From Zheng Gao <zgao@reidwise.com>

Date Thu 3/6/2025 6:17 PM

To Kathleen Freeman <Kathleen@bayramoglu-legal.com>; Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Cc Matthew Sava <sava@reidwise.com>; Shiyong Ye <sy@reidwise.com>

Kathleen:

Thank you for your response. I understand you've been tied up recently, but I would still appreciate it if you could send me a brief message when possible, rather than not responding at all. Our client's business is being frozen by a Court order, and any further delay is causing additional harm.

I always "reply all" in responding to emails. I didn't notice that you had only replied to me in your March 4, 2025, 1:22 PM CST (2:22 PM EST) email, without cc'ing others. I've added back all others in my earlier email to you today.

Regards,

Zheng (James) Gao, Esq.

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From: Kathleen Freeman <Kathleen@bayramoglu-legal.com>

Sent: Thursday, March 6, 2025 1:01 PM

To: Zheng Gao <zgao@reidwise.com>; Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <sy@reidwise.com>

Subject: Re: Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Zheng,

You are under the misunderstanding that I am required to respond to you with a moment's notice; let's be clear that I am not.

I was pulled into an emergency hearing out of town yesterday with less than an hour's notice and was out and in meetings through 8PM. I apologize but you should not expect or demand my response within your own guidelines; I would be happy to appear on a Rule 11 motion for sanctions if you so choose.

In following up on my end, I learned that we have more than sufficient evidence to proceed. Thank you for taking the time to discuss the URL trick with me, but thankfully it does not defeat the case.

I would not oppose your motion to obtain the sealed documents in this case, as that is your right. I would oppose a motion for expedited discovery, sanctions, and dissolution of the P.I. I suggest you appear, file responsive pleadings, and initiate written discovery if you would like to move forward. Of course, I appreciate it is your right to proceed as you deem fit.

I am looping in Katherine Kuhn as she is stepping back into this case, so please continue to copy all of us on your emails. Thanks!

From: Zheng Gao <zgao@reidwise.com>

Date: Thursday, March 6, 2025 at 10:17 AM

To: Kathleen Freeman <Kathleen@bayramoglu-legal.com>, Joseph Droter <Joseph@bayramoglu-legal.com>, Katherine Kuhn <Katherine@bayramoglu-legal.com>, Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>, Shiyong Ye <sy@reidwise.com>

Subject: Re: Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Counsel,

You are ignoring my emails and phone calls.

We will move the Court (1) for leave to conduct expedited discovery, (2) to dissolve the preliminary injunction, (3) to dismiss for failure to state a claim, and (4) to impose sanctions for violating Rule 11(b).

In accordance with Judge Bucklo's individual rules, please inform us whether the Plaintiff will object to our motions.

Regards,

Zheng (James) Gao, Esq.

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From: Zheng Gao <zgao@reidwise.com>

Sent: Wednesday, March 5, 2025 11:05 AM

To: Kathleen Freeman <Kathleen@bayramoglu-legal.com>

Subject: Re: Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Hi Kathleen:

I tried to call you but only left a voicemail. Could you please call me back at 929-400-3331 when you have a moment? I need to determine whether we need to file a motion for expedited discovery, a motion to dissolve the preliminary injunction, a motion to dismiss, and a possible Rule 11 motion.

Regards,

Zheng (James) Gao, Esq.

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From: Zheng Gao <zgao@reidwise.com>

Sent: Tuesday, March 4, 2025 2:24 PM

To: Kathleen Freeman <Kathleen@bayramoglu-legal.com>

Subject: Re: Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Hi Kathleen:

I will be available tomorrow morning. Does 3/5/2025 at 10:00 AM (CST) work for you? Thanks.

Regards,

Zheng (James) Gao, Esq.

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From: Kathleen Freeman <Kathleen@bayramoglu-legal.com>

Sent: Tuesday, March 4, 2025 2:22 PM

To: Zheng Gao <zgao@reidwise.com>

Subject: Re: Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Hi Zheng,

So sorry for the misunderstanding, I am tied up this afternoon as this did not get calendared by my team by mistake. Can you speak tomorrow or Thursday? Thank you for following up!

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From: Zheng Gao <zgao@reidwise.com>

Sent: Tuesday, March 4, 2025 1:03:52 PM

To: Kathleen Freeman <Kathleen@bayramoglu-legal.com>; Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <sy@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>; Zhengchun Wan <zwan@reidwise.com>

Subject: Re: Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Hi Kathleen:

Are you attending the Zoom meeting now? I tried to call you and left a voice message.

Regards,

Zheng (James) Gao, Esq.

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From: Zheng Gao <zgao@reidwise.com>

Sent: Friday, February 28, 2025 4:05 PM

To: Kathleen Freeman <Kathleen@bayramoglu-legal.com>; Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <sye@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>; Zhengchun Wan <zwan@reidwise.com>

Subject: Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Dear Kathleen:

It was a pleasure speaking with you.

As discussed, I am preparing to file a short motion requesting that Funlingo be granted access to the documents filed under seal in this case. Please see the attached draft. Could you kindly confirm that the Plaintiff will not oppose this motion?

Additionally, below is the Zoom link for our conference next Tuesday:

Zheng Gao, Esq. is inviting you to a scheduled Zoom meeting.

Topic: Meeting re: Modlily v Funlingo

Time: Mar 4, 2025 02:00 PM Eastern Time (US and Canada)

Join Zoom Meeting

<https://zoom.us/j/93196858407?pwd=9TRdoJjKYBVcUn2HJu7epJKpPOyhbv.1>

Meeting ID: 931 9685 8407

Passcode: 036900

One tap mobile

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- +1 309 205 3325 US
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- +1 346 248 7799 US (Houston)
- +1 360 209 5623 US
- +1 386 347 5053 US
- +1 507 473 4847 US
- +1 564 217 2000 US

Meeting ID: 931 9685 8407

Passcode: 036900

Find your local number: <https://zoom.us/u/addF3tZx9B>

Thanks.

Regards,

Zheng (James) Gao, Esq.

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From: Kathleen Freeman <Kathleen@bayramoglu-legal.com>
Sent: Thursday, February 27, 2025 5:20 PM
To: Zheng Gao <zgao@reidwise.com>; Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>
Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <sye@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>; Zhengchun Wan <zwan@reidwise.com>
Subject: Re: Whether Plaintiff Objects To Motion for Expedited Discovery | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

No problem.

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From: Zheng Gao <zgao@reidwise.com>
Sent: Thursday, February 27, 2025 4:20:17 PM
To: Kathleen Freeman <Kathleen@bayramoglu-legal.com>; Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>
Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <sye@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>; Zhengchun Wan <zwan@reidwise.com>
Subject: Re: Whether Plaintiff Objects To Motion for Expedited Discovery | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Hi Kathleen:

Would Zoom work for you? I believe using Zoom will allow me to share my screen, which may help in better understanding the matter. Thank you.

Below is the link:

Zheng Gao, Esq. is inviting you to a scheduled Zoom meeting.

Topic: Meeting re: Modlily v Funlingo
Time: Feb 28, 2025 03:00 PM Eastern Time (US and Canada)
Join Zoom Meeting
<https://zoom.us/j/93196858407?pwd=9TRdoJjKYBVcUn2HJu7epJKpPOyhbv.1>

Meeting ID: 931 9685 8407
Passcode: 036900

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- +1 305 224 1968 US
- +1 309 205 3325 US
- +1 312 626 6799 US (Chicago)
- +1 301 715 8592 US (Washington DC)
- +1 669 444 9171 US
- +1 669 900 6833 US (San Jose)
- +1 689 278 1000 US
- +1 719 359 4580 US
- +1 253 205 0468 US
- +1 253 215 8782 US (Tacoma)
- +1 346 248 7799 US (Houston)
- +1 360 209 5623 US
- +1 386 347 5053 US
- +1 507 473 4847 US
- +1 564 217 2000 US

Meeting ID: 931 9685 8407

Passcode: 036900

Find your local number: <https://zoom.us/j/93196858407>

Regards,

Zheng (James) Gao, Esq.

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From: Kathleen Freeman <Kathleen@bayramoglu-legal.com>

Sent: Thursday, February 27, 2025 5:15 PM

To: Zheng Gao <zgao@reidwise.com>; Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <sye@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>; Zhengchun Wan <zwan@reidwise.com>

Subject: Re: Whether Plaintiff Objects To Motion for Expedited Discovery | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Works for me, you can reach me at (708)845-0227. Talk soon

From: Zheng Gao <zgao@reidwise.com>

Date: Thursday, February 27, 2025 at 3:45 PM

To: Kathleen Freeman <Kathleen@bayramoglu-legal.com>, Joseph Droter <Joseph@bayramoglu-legal.com>, Katherine Kuhn <Katherine@bayramoglu-legal.com>, Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>, Shiyong Ye <sye@reidwise.com>, Yiqi Wang <yqwang@reidwise.com>, Tianjiao Lyu <tlyu@reidwise.com>, Zhengchun Wan <zwan@reidwise.com>

Subject: Re: Whether Plaintiff Objects To Motion for Expedited Discovery | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Hi Kathleen:

Thank you for your email.

I will be available tomorrow afternoon for a call with you to discuss. Will you be available on 2/28/2025 at 2:00 PM CST (*i.e.*, 3:00 PM EST)? Thanks.

Regards,

Zheng (James) Gao, Esq.

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From: Kathleen Freeman <Kathleen@bayramoglu-legal.com>

Sent: Thursday, February 27, 2025 4:39 PM

To: Zheng Gao <zgao@reidwise.com>; Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <sye@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>; Zhengchun Wan <zwan@reidwise.com>

Subject: Re: Whether Plaintiff Objects To Motion for Expedited Discovery | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Hi Zheng,

Apologies for the delay, our team just concluded an out-of-state trial this week, so we are shuffling some cases around. I am going to handle this matter going forward, along with my colleague, Joseph Droter.

I am still digging into this file but have received your correspondences below. I would appreciate it if you can give me until tomorrow to review the file on my end and ensure I provide you with an informed response. I just wanted to touch base today to let you know I'm working on it.

At this point we would oppose your motion for expedited discovery. I don't see that your client has issued any written discovery in the case at bar, attempted to conduct a meet-and-confer, or made reasonable efforts to obtain documents which are equally as available to your client as they are to mine. And while I am always open to discussion, you don't cite any legal authority in your emails which would compel me to undertake the burden of compiling these documents for you at my client's expense, particularly when it comes to a completely separate and unrelated lawsuit (Case No. 1:24-cv-11029 – which is currently pending) to which your client is not a party.

I am relatively free tomorrow for a call, but I will get you a firm response by early afternoon so you have the opportunity to review first. Let me know your thoughts.

Looking forward to working with you!

Katie Freeman

From: Zheng Gao <zgao@reidwise.com>

Date: Thursday, February 27, 2025 at 10:46 AM

To: Joseph Droter <Joseph@bayramoglu-legal.com>, Katherine Kuhn <Katherine@bayramoglu-legal.com>, Kathleen Freeman <Kathleen@bayramoglu-legal.com>, Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>, Shiyong Ye <sye@reidwise.com>, Yiqi Wang <yqwang@reidwise.com>, Tianjiao Lyu <tlyu@reidwise.com>, Zhengchun Wan <zwan@reidwise.com>

Subject: Whether Plaintiff Objects To Motion for Expedited Discovery | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)
Counsel,

We have not yet received a response to my two emails sent yesterday. We interpret your silence as an unwillingness to voluntarily produce the requested documents, and therefore are going to file a motion for expedited discovery. Specifically, we will seek an order directing Plaintiff to produce the following documents on expedited basis:

1. All documents filed under seal in this case, or alternatively, an order directing the Court Clerk to unseal all documents previously filed under seal in this matter.
2. All documents that Amazon has produced to Plaintiff thus far in this case.
3. The "Schedule A" filed under seal as Exhibit 2 to the Complaint in the earlier case Hong Kong Yu'En E-Commerce v. USA 1ST Store, Case No. 1:24-cv-11029, with the docket number "[Case: 1:24-cv-11029, Document #: 2-2](#)."

These documents are relevant and necessary to support our intended motions to dissolve the preliminary injunction and to dismiss the case. In accordance with Judge Bucklo's individual rules, please inform us whether Plaintiff has any objections to our motion for expedited discovery.

Thank you.

Regards,

Zheng (James) Gao, Esq.

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From: Zheng Gao <zgao@reidwise.com>

Sent: Wednesday, February 26, 2025 1:16 PM

To: Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Kathleen Freeman <Kathleen@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <sye@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>

Subject: Request for Sealed Schedule A in earlier Case: 1:24-cv-11029 Document #: 2-2

Counsel,

In addition to the documents requested in my earlier email, we also request that you immediately provide the "Schedule A" that your firm filed under seal as Exhibit 2 to the Complaint in the case *Hong Kong Yu'En E-Commerce v. USA 1ST Store*, Case No. 1:24-cv-11029. The docket number for the requested document is "[Case: 1:24-cv-11029 Document #: 2-2](#)".

We reasonably suspect that your client previously filed the same Complaint against my client, Funlingo, in an earlier case, [1:24-cv-11029](#). On October 29, 2024, Judge J. Daniel, *sua sponte*, ordered your client to show cause why Rule 11 sanctions should not be imposed for making unfounded claims. It appears that, in response to this rule to show cause, your client dropped the Schedule A defendants from that case, and re-filed the identical Complaint against the same defendants one month later, now before a different judge, Judge Bucklo.

To clarify whether Funlingo was one of the Schedule A defendants that your client dropped in the earlier case, **we request the immediate production of the "Schedule A" filed in the earlier case ([Case: 1:24-cv-11029 Document #: 2-2](#))**.

We look forward to receiving the document. Thank you.

Regards,

Zheng (James) Gao, Esq.

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From: Zheng Gao <zgao@reidwise.com>

Sent: Wednesday, February 26, 2025 10:51 AM

To: Joseph Droter <Joseph@bayramoglu-legal.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Kathleen Freeman <Kathleen@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <syey@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>

Subject: Request for Sealed Documents and Subpoenaed Documents | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Counsel:

I hope this message finds you well.

As you are aware, our firm represents the defendant, Funlingo, in the above-captioned matter. We are currently reviewing the pleadings and motions previously filed in this case, and are considering filing a motion to dismiss and to dissolve the preliminary injunction. However, we do not have access to the documents you filed under seal, some of which are key evidence relied upon in your motions for a TRO and preliminary injunction. Additionally, we understand from the Plaintiff's motion for preliminary injunction that online platforms, such as Amazon, have provided documents in compliance with the TRO.

In light of these, we request that you immediately provide:

1. The following documents you filed under seal:

- Dkt. #3
- Dkt. #5
- Dkt. #8
- Dkt. #10
- Dkt. #12
- Dkt. #14
- Dkt. #21

2. All documents your firm has received from non-party witnesses, including Amazon, pursuant to the orders and subpoenas issued in this case.

We look forward to your prompt response. Thank you.

Regards,

Zheng (James) Gao, Esq.

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From: Joseph Droter <Joseph@bayramoglu-legal.com>

Sent: Thursday, February 13, 2025 7:08 PM

To: Zheng Gao <zgao@reidwise.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <syey@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Kathleen Freeman <Kathleen@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Subject: Re: Request to Extend Time To Respond | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Good Evening,

Defendant FUNLINGO is listed as Defendant 6 in Schedule A. An erroneous list was attached as Exhibit 2 [Dkt No. 27-2] while unsealing the original complaint and re-attaching the original Schedule A on the first amended complaint, which has now been corrected [Dkt No. 40]

Best regards,

Joseph

JOSEPH
DROTER

Associate Attorney

Admissions: Illinois



Bayramoglu Law

1540 West Warm Springs Road, Suite 100,
Henderson, NV 89014
(702) 462-5973
www.bayramoglu-legal.com

EVERY PERSON WHO
WALKS THROUGH
OUR DOOR IS
IMPORTANT TO US

From: Zheng Gao <zgao@reidwise.com>

Sent: Thursday, February 13, 2025 4:32 PM

To: Joseph Droter <Joseph@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <syey@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Kathleen Freeman <Kathleen@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Subject: Re: Request to Extend Time To Respond | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Dear Joseph,

As I review the filings in this case, I couldn't find my client, "Funlingo," listed as a defendant in either the First Amended Complaint [Dkt. #27] or its Schedule "A" (Exhibit 2) [Dkt. #27.2]. Could you please point me to where Funlingo is named as a defendant in the summons or the pleading?

Thank you.

Regards,

Zheng (James) Gao, Esq.

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From: Joseph Droter <Joseph@bayramoglu-legal.com>

Sent: Thursday, February 13, 2025 4:32 PM

To: Zheng Gao <zgao@reidwise.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <syey@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>; Katherine Kuhn <Katherine@bayramoglu-legal.com>; Kathleen Freeman <Kathleen@bayramoglu-legal.com>; Litigation <litigation@bayramoglu-legal.com>

Subject: Re: Request to Extend Time To Respond | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Good Afternoon,

Including my colleagues on this email as well. Plaintiff would not oppose your Client's motion for extension of time to answer. 30 days is agreeable. You may file the motion as unopposed.

Best regards,

Joseph

**JOSEPH
DROTER**

Associate Attorney

Admissions: Illinois



Bayramoglu Law

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Henderson, NV 89014

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IMPORTANT TO US

From: Zheng Gao <zgao@reidwise.com>

Sent: Thursday, February 13, 2025 2:55 PM

To: Gokalp Bayramoglu <gokalp@bayramoglu-legal.com>; Joseph Droter <Joseph@bayramoglu-legal.com>; Deniz Bayramoglu <deniz@bayramoglu-legal.com>; Shawn Mangano <Shawnmangano@bayramoglu-legal.com>

Cc: Matthew Sava <sava@reidwise.com>; Shiyong Ye <syey@reidwise.com>; Yiqi Wang <yqwang@reidwise.com>; Tianjiao Lyu <tlyu@reidwise.com>

Subject: Request to Extend Time To Respond | Hong Kong YU'EN E-Commerce Co. Limited v. Schedule A Defendants (Case No. 24-cv-12483)

Counsel:

Our firm was recently retained by Funlingo, a defendant in the above-captioned matter.

I am writing to inquire whether Plaintiff would be willing to extend the deadline for Funlingo's response to the First Amended Complaint by one month, to Friday, March 14, 2025. We require additional time to properly review and address the allegations.

Thank you in advance for your anticipated courtesy.

Regards,

Zheng (James) Gao, Esq.

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From: usdc_ecf_ilnd@ilnd.uscourts.gov <usdc_ecf_ilnd@ilnd.uscourts.gov>

Sent: Thursday, February 13, 2025 3:09 PM

To: ecfmail_ilnd@ilnd.uscourts.gov <ecfmail_ilnd@ilnd.uscourts.gov>

Subject: Activity in Case 1:24-cv-12483 HONG KONG YU'EN E-COMMERCE CO. LIMITED v. The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified in Schedule A Hereto attorney appearance

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Case Name: HONG KONG YU'EN E-COMMERCE CO. LIMITED v. The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified in Schedule A Hereto

Case Number: [1:24-cv-12483](#)

Filer: FUNLINGO

Document Number: [39](#)

Docket Text:

ATTORNEY Appearance for Defendant FUNLINGO by Zheng Gao (Gao, Zheng)

1:24-cv-12483 Notice has been electronically mailed to:

Gokalp Bayramoglu gokalp@bayramoglu-legal.com, 4641871420@filings.docketbird.com, litigation@bayramoglu-legal.com

Joseph Wendell Droter Joseph@bayramoglu-legal.com, 3330888420@filings.docketbird.com, litigation@bayramoglu-legal.com

Nihat Deniz Bayramoglu deniz@bayramoglu-legal.com, 8506798420@filings.docketbird.com, elizabeth@bayramoglu-legal.com, litigation@bayramoglu-legal.com

Shawn Anthony Mangano shawnmangano@bayramoglu-legal.com, 3062831420@filings.docketbird.com, litigation@bayramoglu-legal.com

Zheng Gao zgao@reidwise.com

1:24-cv-12483 Notice has been delivered by other means to:

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Original filename:n/a

Electronic document Stamp:

[STAMP dcecfStamp_ID=1040059490 [Date=2/13/2025] [FileNumber=28990973-0] [55af2ef2736d3fd41983855e385da6da21d95e66d63e829ede22c4007864a31d4457442277e04800ffc7a22839854bae41f1b3182d8319d06b6896b3bec1ad87]]

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