

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

HONG KONG YU'EN E-COMMERCE CO. LIMITED,	)	
	)	
	)	
Plaintiff,	)	Case No: 1:24-cv-12483-EEB-
	)	MDW
v.	)	
	)	
THE INDIVIDUALS, CORPORATIONS,	)	Honorable Judge Elaine E. Bucklo
LIMITED LIABILITY COMPANIES,	)	Magistrate M. David Weisman
PARTNERSHIPS AND UNINCORPORATED	)	
ASSOCIATIONS IDENTIFIED IN	)	
SCHEDULE "A" HERETO,	)	
	)	
Defendants.	)	

**FUNLINGO'S UNOPPOSED SECOND MOTION FOR
EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

FUNLINGO, a defendant in this case, by and through its undersigned counsel, and for its unopposed second motion for extension of time to answer or otherwise plead, state as follows:

1. FUNLINGO respectfully moves the Court, under FRCP 6(b)(1)(A), for an order further extending its deadline to respond to the First Amended Complaint ("FAC") to April 14, 2025.
2. Plaintiff stated that it would not oppose the requested extension.
3. By Minute Order dated February 21, 2025 (Dkt. # 45), the Court granted FUNLINGO's first motion for an extension of time to answer or otherwise plead, extending the deadline to March 14, 2025.
4. By Minute Order dated February 21, 2025 ([Dkt. # 45](#)), this Court granted

FUNGLINGO's first motion for extension of time to answer or otherwise plead, extending the deadline to March 14, 2025.

5. Therefore, this second motion for extension is made prior to the responsive pleading deadline.

6. There is good cause for the requested extension.

7. On March 7, 2025, FUNLINGO filed an opposed motion to dissolve the preliminary injunction and for expedited discovery ([Dkt. #47](#)), and an unopposed motion for access to sealed documents ([Dkt. #49](#)).

8. As discussed in more detail in the foregoing motions, despite repeated requests, (1) Plaintiff has refused to serve, and FUNLINGO has not had access to, the documents Plaintiff filed under seal in this case, including those purported evidence Plaintiff relied upon in its motions for TRO and preliminary injunctions (*e.g.*, [Dkt. #8-1](#), [#8-2](#), and [#10](#)); (2) Plaintiff has refused to disclose the documents it received from Amazon through expedited discovery; and (3) Plaintiff has refused to disclose the "Schedule A" it filed under seal as Exhibit 2 to the Complaint in the earlier case *Hong Kong Yu'En E-Commerce v. USA IST Store*, Case No. 1:24-cv-11029, with the docket number "[Case: 1:24-cv-11029, Document #: 2-2](#)."

9. These documents are necessary for FUNLINGO to form its defenses, counterclaims (*e.g.*, abuse of process), and potentially a Rule 11 motion.

10. Accordingly, FUNLINGO respectfully requests that the Court grant this unopposed second motion for an extension, further extending FUNLINGO's deadline to respond to the FAC to April 14, 2025.

11. Except as disclosed herein, no other application for this relief has been made.

Dated: March 11, 2025

Respectfully submitted,

/s/ Zheng Gao

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