

**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 Elaine E. Bucklo

Magistrate M. David Weisman

STIPULATED ASSET RESTRAINT

Plaintiff Hong Kong Yu'En E-Commerce Co. Ltd. ("Plaintiff"), and Defendant Zeagoo ("Zeagoo"), hereby jointly file this stipulation regarding an agreed asset restraint of Zeagoo's e-commerce financial accounts for the pendency of this action.

Whereas, the Court entered a Preliminary Injunction Order, including an asset restraint, on January 22, 2025 (Dkt. No. 35);

Whereas, as a result of the Preliminary Injunction Order, Zeagoo's e-commerce store financial account is frozen and restrained;

Whereas, the Parties hereby stipulate to a modification of the Preliminary Injunction Order to reflect an asset restraint of Zeagoo's e-commerce store financial account for the pendency of this action in the amount of only \$350,000.00 USD, and all other e-commerce assets shall be unfrozen, released, and unencumbered with the ability to withdraw the unencumbered portion of the remaining assets. Amazon.com is directed to so comply with this stipulation.

DATED: April 15, 2025

By: /s/William R. Bress

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By: /s/Ivan Posey

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Attestation of Concurrence of Signatories

I, Ivan Posey, attest that all signatories listed above, and on whose behalf this filing is submitted, concur in the filing's content and have authorized the filing.

CERTIFICATE OF SERVICE

The undersigned certifies that on April 15, 2025, we caused the foregoing document to be filed electronically with the Clerk of the Court via CM/ECF, which will notify all parties in this matter who are registered with the Court's CM/ECF filing system of such filing.

Respectfully Submitted,

By: /s/ Ivan Posey

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