

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

GAG GIFTS FOR GOOD CAUSES, LLC,
dba POOPING POOCHES,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, AND UNINCORPORATED
ASSOCIATIONS IDENTIFIED ON
SCHEDULE A HERETO,

Defendants.

Case No.:

PLAINTIFF’S MOTION FOR LEAVE TO FILE DOCUMENTS UNDER SEAL

Plaintiff, GAG GIFTS FOR GOOD CAUSES, LLC, dba POOPING POOCHES (“Plaintiff” or “Pooping Pooches”) respectfully requests leave to file the following attached documents under seal: (1) Plaintiff’s Complaint; (2) Schedule “A” attached to the Complaint, which lists the Defendant Internet Stores; (3) Plaintiff’s Motion and Memorandum in Support of Plaintiff’s *Ex Parte* Request for an Emergency Temporary Restraining Order (“TRO”), which includes alleged facts of the Complaint and Plaintiff’s reasoning for seeking such an order; and (4) Plaintiff’s Declaration In Support of the TRO. In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for federal trademark infringement and counterfeiting, false designation of origin, and violation of the Illinois Uniform Deceptive Trade Practices Act.

Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence and the concealment or transfer of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will move to unseal these documents.

Dated: December 20, 2024

Respectfully submitted,

/s/ Cory Jay Rosenbaum
(electronically signed)

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