

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

TOYOTA MOTOR SALES, U.S.A., INC.,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 26-cv-09569

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Toyota Motor Sales, U.S.A., Inc. (“Plaintiff”) files this Motion requesting leave to file the following documents under seal: (1) Schedule A attached to the Complaint, which lists the fully interactive e-commerce stores operating under the seller aliases (the “Seller Aliases”) and the e-commerce store URLs under the Online Marketplaces; (2) Exhibit 2 to the Complaint, which includes screenshot printouts showing the e-commerce stores operating under the Seller Aliases; and (3) Exhibit 2 to the Declaration of Teena Bohi, which includes screenshot printouts showing the e-commerce stores operating under the Seller Aliases.

In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for trademark infringement, counterfeiting, and false designation of origin. 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 hiding or transferring 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 this 10th day of August 2026.

Respectfully submitted,

/s/ Justin R. Gaudio

Amy C. Ziegler
Justin R. Gaudio
Trevor C. Talhami
Madeline B. Halgren
Greer, Burns & Crain, Ltd.
200 West Madison Street, Suite 2100
Chicago, Illinois 60606
312.360.0080
312.360.9315 (facsimile)
aziegler@gbc.law
jgaudio@gbc.law
ttalhami@gbc.law
mhalgren@gbc.law

Counsel for Plaintiff
Toyota Motor Sales, U.S.A., Inc.