

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

COLLECTANEA J. LIMITED,

Plaintiff,

v.

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

Defendants.

Case No. 25-cv-11910

**Judge Matthew F. Kennelly**

**Magistrate Judge Gabriel A. Fuentes**

**PLAINTIFF’S MOTION FOR ENTRY OF A PRELIMINARY  
INJUNCTION AND INCORPORATED MEMORANDUM OF LAW**

Plaintiff Collectanea J. Limited (“Plaintiff” or “Collectanea”) seeks entry of a Preliminary Injunction against the Defendants identified on the Amended Schedule A. [Doc. 7]. The scope of the Preliminary Injunction is substantially identical to the Temporary Restraining Order entered on November 4, 2025. [Doc. 25]. In support thereof, Plaintiff submits the following Memorandum of Law.

**MEMORANDUM OF LAW**

**I. BACKGROUND AND PROCEDURAL HISTORY**

Plaintiff filed its Amended Complaint on October 10, 2025 [Doc. 6], to combat the willful and intentional infringement of its federally registered trademark, which is covered by Registration No. 4,663,497 (“the Beadnova Mark”), and its federally registered copyright, which is covered by Registration No. VA0002348112 (“the Beadnova Copyrighted Work”). On October 20, 2025, Plaintiff filed its Motion for Expedited Discovery. [Doc. 15]. This Court granted Plaintiff’s Motion for Expedited Discovery, on October 27, 2025. [Doc. 19]. On October 31,

2025, Plaintiff filed its renewed Motion for Entry of an *ex parte* Temporary Restraining Order, Including a Temporary Injunction and Temporary Asset Restraint enjoining the selling and/or offering for sale products utilizing unauthorized and infringing copies of the Beadnova Mark. [Doc. 22]. Plaintiff also filed a Motion for Alternate Service of Process [Doc. 21]. This Court granted Plaintiff's Motion for Expedited Discovery, Renewed Motion for Alternate Service of Process, and Renewed Motion for Temporary Restraining Order on October 27, 2025. [Doc. 24]. On November 14, 2025, Plaintiff moved to extend the TRO for fourteen days. [Doc. 26]. The same day, this Court granted Plaintiff's motion to extend the TRO through December 2, 2025. [Doc. 27]. On November 24, 2025, Plaintiff served Defendants with the Summons and Complaint via email [Doc. 35], pursuant to this Court's order. [Doc. 24].

The Amended Complaint alleges that Defendants, who are individuals, partnerships and unincorporated associations identified on Amended Schedule "A", willfully and intentionally infringed on Plaintiff's Beadnova Mark and Beadnova Copyrighted Work to promote, advertise, display, and offer for sale various beaded jewelry-related products. [Doc. 6 at ¶¶ 28-29, 41-44]. Defendants engage in this activity within this district and throughout the United States by operating storefronts on at least the Alibaba, Aliexpress, Amazon, bonanza, eBay, and Walmart platforms, as identified by the Seller Name ("Seller IDs" hereinafter). [Declaration of Yu Chung Ting at Doc. 11 at ¶¶ 20-24]. As provided in the Declaration of Yu Chung Ting, Plaintiff has obtained evidence demonstrating that Defendants use Seller IDs over the Internet to advertise, offer for sale, and display the Beadnova Mark and Beadnova Copyrighted Work utilizing Plaintiff's registered photographs and/or registered mark in the listings. *Id.* By these activities as described in the Declaration of Yu Chung Ting and the Declaration of Larry Ford Banister, II,

Defendants are defrauding Plaintiff and the consuming public for their own gain. [*Id.* at ¶¶25-26, 32-36; Doc. 23-1].

Plaintiff now moves to convert the Temporary Restraining Order into a Preliminary Injunction.

## **II. ARGUMENT**

### **A. A Preliminary Injunction Extending Relief Already Granted in the TRO Is Appropriate**

Plaintiff respectfully requests that this Court convert the TRO to a preliminary injunction to prevent further unlawful conduct by Defendants. In cases addressing similar allegations of the Internet-based violation of intellectual property rights, including trademark infringement, this Court and others in the Northern District of Illinois regularly convert temporary restraining orders into preliminary injunctions. *See Viacom International Inc. v. The Partnerships, et al.*, Case No. 23-cv-02736, (N.D. Ill. June 5, 2023) (Kennelly, J.); *Sega Corporation et al v. The Partnerships, et al.*, Case No. 23-cv-16654 (N.D. Ill. January 22, 2024) (Rowland, J.); *Collectanea J. Limited v. The Partnerships, et al.*, Case No. 24-cv-06472, (N.D. Ill. Oct. 9, 2024) (Daniel, J.); *Luxottica Group S.p.A. v. The Partnerships, et al.*, Case No. 22-cv-02425 (N.D. Ill. June 15, 2022) (Guzman, J.); *Ardman Animations Limited and Wallace & Gromit Limited v. The Partnerships, et al.*, Case No. 25-cv-09364 (N.D. Ill. Sept. 16, 2025) (Kennelly, J.).

### **B. This Court Has Already Found that the Requirements for a Preliminary Injunction Have Been Satisfied**

Since the standard for granting a TRO and the standard for granting a preliminary injunction are identical in this Circuit, the requirements for entry of a preliminary injunction extending the TRO have been satisfied. *See, e.g. Charter Nat'l Bank & Trust v. Charter One Fin., Inc.*, No. 1:01-cv-00905 at \*1 (N.D. Ill. May 15, 2001) (citations omitted). A temporary

restraining order or preliminary injunction may be issued upon a showing that: “(1) there is a reasonable likelihood that Plaintiff will succeed on the merits; (2) Plaintiff will suffer irreparable injury if the order is not granted because there is no adequate remedy at law; (3) the balance of hardships tips in Plaintiff’s favor; and (4) the public interest will not be disserved by the injunction.” *Columbia Pictures Indus., Inc. v. Jasso*, 927 F. Supp. 1075, 1076 (N.D. Ill. 1996). By virtue of this Court’s entry of the TRO, it has found that the above requirements have been satisfied.

**C. The Equitable Relief Sought Remains Appropriate**

The Lanham Act provides that courts may grant injunctive relief “according to the principles of equity and upon such terms as the court may deem reasonable.” 15 U.S.C. § 1116(a).

A party seeking to obtain a preliminary injunction must demonstrate:

- (1) a substantial likelihood of success on the merits,
- (2) a substantial threat of irreparable injury if the injunction were not granted,
- (3) that the threatened injury to the plaintiff outweighs the harm an injunction may cause the defendant, and
- (4) that granting the injunction would not disserve the public interest.

Plaintiff requests conversion of the TRO to a preliminary injunction so that Defendants’ accounts in U.S.-based financial institutions remain restrained. Since the entry of the TRO, the e-commerce platforms have restrained accounts used to facilitate the display, marketing, advertising, listings for sale and sale of counterfeit and infringing goods utilizing the Beadnova Mark. In the absence of a preliminary injunction, Defendants will likely attempt to move any assets from accounts in U.S.-based financial institutions to offshore, thus denying Plaintiff the equitable remedy of an accounting for profits.

This Court has already found that Plaintiff has met the requirements for a Temporary Restraining Order by virtue of its prior orders implementing a TRO. Plaintiff respectfully relies

upon its prior recitation of facts in its Amended Complaint [Doc. 6], Declaration of Yu Chung Ting [Doc. 11], Renewed Motion for Temporary Restraining Order and Supporting Memorandum [Doc. 22, 23] and Motion for Extension of Temporary Restraining Order [Doc. 26] to support the argument that immediate and irreparable injury, loss, or damage will result to Plaintiff without the relief requested. By virtue of this Court's prior orders granting the temporary restraining order and extension of the temporary restraining order, this Court has already found that immediate and irreparable harm will be mitigated or prevented by the injunctive relief granted, including the asset restraint. Plaintiff respectfully submits that there has been no change in circumstances which would affect this Court's consideration of any immediate and irreparable injury, loss, or damage to Plaintiff without the relief requested herein. In the absence of a preliminary injunction, Defendants will likely attempt to move any assets from any accounts in U.S.-based financial institutions to offshore accounts, thus denying Plaintiff the equitable remedy of accounting for profits.

### **III. CONCLUSION**

In view of the foregoing, Plaintiff respectfully requests that this Court enter the preliminary injunction in the form submitted herewith.

Respectfully submitted this 24th day of November, 2025.

/s/ L. Ford Banister, II  
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