

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

JUANREN WU,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE "A,"

Defendants.

Case No. 26-cv-00358

Judge Andrea R. Wood

Magistrate Judge Beth W. Jantz

[proposed] Preliminary Injunction Order

THIS CAUSE being before the Court on Plaintiff Juanren Wu's ("Plaintiff") Motion for Entry of a Preliminary Injunction [Doc. 24] against the defendants identified in the Amended Schedule A [Doc. 8] to the Amended Complaint and attached hereto (collectively, the "Defendants"), and this Court having heard the evidence before it hereby GRANTS Plaintiff's Motion in its entirety.

The Court finds, in the absence of adversarial presentation, that it has personal jurisdiction over Defendants because Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Plaintiff has provided a basis to conclude that Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more seller aliases, offer shipping to the United States, including Illinois, and have sold products using infringing versions of Plaintiff's federally registered design patent, No. US-D1,049,230-S (hereinafter the "Paint Pen Patent"), to residents of Illinois.

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order (“TRO”) [Doc. 19] should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Plaintiff’s previously granted Motion for Entry of a Temporary Restraining Order establishes that Plaintiff has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Plaintiff will suffer irreparable harm if the injunction is not granted. Accordingly , this Court orders that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily enjoined and restrained from:

a. using Plaintiff's Paint Pen Patent or any reproductions, infringing copies, or colorable imitations in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Plaintiff product or not authorized by Plaintiff to be sold in connection with the Paint Pen Patent;

b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Plaintiff product, that is not Plaintiff’s or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale;

c. committing any acts calculated to cause consumers to believe that Defendants’ products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;

d. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products

or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which feature the Paint Pen Patent, and which use the Paint Pen Patent.

e. further infringing Plaintiff's Paint Pen Patent and/or damaging Plaintiff's goodwill.

2. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.

3. Any Third Party Providers, including but not limited to Amazon, Walmart, AirWallex PayPal, Inc. ("PayPal"), LianLian Global, LL Pay U.S., LLC, and Lianlian Yintong Electronic Payment Co. Ltd. ("LianLian") Stripe, Pingpong, and its related companies and affiliates shall, within two (2) business days of receipt of this Order, for any Defendant or any of Defendants' Online Marketplace Accounts or websites:

a. locate all accounts and funds connected to Defendants, Defendants' Online Marketplace Accounts or Defendants' websites, including, but not limited to, any financial accounts connected to the information listed in the Amended Schedule A of the Amended Complaint hereto, the email addresses for Defendants provided for Defendants by third parties; and

b. restrain and enjoin any such accounts or funds from transferring or disposing of money or other of Defendants' assets until further ordered by this Court.

4. The third party platforms and service providers, including but not limited to Amazon, Amazon Pay, AirWallex, shein, temu, Walmart, Payoneer, Paypal, Stripe, LianLian Global, LL Pay U.S., LLC, and Lianlian Yintong Electronic Payment Co. Ltd. ("LianLian") and/or PingPong, (hereinafter, "the Third Party Providers") are hereby required to comply by assisting to identify all accounts involved in the Defendants' alleged infringement scheme and provide Plaintiff with

documents and information necessary to permit it to comply with this Court's order authorizing alternate service of process. The discovery shall be limited to all information and documents in the Third Party Providers' possession related to:

- a. financial accounts and/or sub-accounts, associated with the Internet based e-commerce stores operating under the Seller IDs identified on the Amended Schedule "A" to the Complaint in this action;
- b. all other accounts which transfer funds into the same financial institution account(s) or any of the other financial accounts subject to this action;
- c. an accounting of all funds restrained and identify the financial account(s) and sub-account(s) which the relevant accounts are related to;
- d. the account transactions related to all funds transmitted into the financial account(s) and sub-account(s) subject to this action;
- e. the true identities including names, addresses, email addresses, and IP addresses, of each person who registered, are listed in, logged into, used, or who otherwise handled or is associated with the financial/payment processing accounts of all Defendants;
- f. the full list of stores and associated financial/payment processing accounts opened, operated by, or at any time used by the Defendants.

The discovery requests here seek only to obtain information and documents to identify the Defendants and the accounts used in the infringement in order to properly serve Defendants with notice of this action and any scheduled preliminary injunction hearing.

5. Plaintiff is authorized to issue expedited written discovery, pursuant to Federal Rules of Civil Procedure 33, 34, and 36, related to:

a. the identities and locations of Defendants, their officers, agents, servants, employees, attorneys, and any persons acting in concert or participation with them, including all known contact information, including any and all associated e-mail addresses; and

b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Defendants' Seller Aliases and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective e-commerce stores.

6. Plaintiff is authorized to issue any such expedited discovery requests authorized in Paragraph 4 via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

7. Plaintiff may provide notice of these proceedings to Defendants, including notice of the preliminary injunction hearing and service of process pursuant to Fed. R. Civ. P. 4(f)(3), electronically publishing a link to the Amended Complaint, this Order and other relevant documents on a website and by sending an e-mail to the e-mail addresses for Defendants identified in the Amended Schedule A [Doc. 8] and any email addresses provided for Defendants by third parties that include a link to said website and copies of the relevant documents.

8. The combination of providing notice via electronic publication or e-mail, along with any notice that Defendants receive from any Third Party Providers, including Amazon, Walmart, AirWallex LianLian Global, LL Pay U.S., LLC, and Lianlian Yintong Electronic Payment Co. Ltd. ("LianLian"), Paypal, Stripe, and PingPong, and its related companies and affiliates shall

constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.

9. Plaintiff may provide notice of these proceedings to third parties by delivery of this Order and other relevant documents to the following Online Marketplace platforms, Financial Institutions and/or Third Party Service Providers via email delivery.

10. The Schedule A [Doc. 4], Amended Schedule A [Doc. 8], and Exhibits Two and Three to the Declaration of Juanren Wu [Docs. 10; 11-1; 11-2] and the sealed Temporary Restraining Order [Doc. 19] are ordered unsealed.

11. The Fifty Thousand Dollar (\$50,000.00) bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

12. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two days' notice to Plaintiff or on shorter notice as set by this Court.

IT IS SO ORDERED.

Dated: April ___, 2026.

Andrea R. Wood
United States District Judge

AMENDED SCHEDULE A

Defendant No.	Platform	Store Name	Store Url
1	Amazon	ahaok	https://www.amazon.com/sp?ie=UTF8&seller=A1KYCTS0H23H44&asin=B0CNCZQWTH&ref_=dp_merchant_link&isAmazonFulfilled=1
2	Amazon	Avimegii Store	https://www.amazon.com/sp?ie=UTF8&seller=A1CVYIE2DK5KDV&asin=B0BQ5Y67L6&ref_=dp_merchant_link&isAmazonFulfilled=1
3	Amazon	BENOSPACE DIRC	https://www.amazon.com/sp?ie=UTF8&seller=A34MNY616NF8BN&asin=B0CX1HYJS7&ref_=dp_merchant_link&isAmazonFulfilled=1
4	Amazon	BENOSPACE DIRECT	https://www.amazon.com/sp?ie=UTF8&seller=A11QM32V0G4BYL&asin=B09BYWCDNQ&ref_=dp_merchant_link&isAmazonFulfilled=1
5	Amazon	beyonday	https://www.amazon.com/sp?ie=UTF8&seller=A320SC75LMQRHW&asin=B0C65K7CJH&ref_=dp_merchant_link&isAmazonFulfilled=1
6	Amazon	Ceekeer	https://www.amazon.com/sp?ie=UTF8&seller=A3CB0FKMLKHOM0&asin=B0CYMRPXXW&ref_=dp_merchant_link&isAmazonFulfilled=1
7	Amazon	FIGSUN	https://www.amazon.com/sp?ie=UTF8&seller=A187VNTBT0R1FV&asin=B0CBPM1STB&ref_=dp_merchant_link&isAmazonFulfilled=1
8	Amazon	foshanshiyuanhengdianzikejiyouxiangongsi	https://www.amazon.com/sp?ie=UTF8&seller=A1T1J2PNQH2O8H&asin=B0FCXW1RF9&ref_=dp_merchant_link
9	Amazon	Frogecho	https://www.amazon.com/sp?ie=UTF8&seller=A2I WV6SXFIZPL4&asin=B0CXXHFR2X&ref_=dp_merchant_link
10	Amazon	Gartwan	https://www.amazon.com/sp?ie=UTF8&seller=A1QUQWBAT5J17D&asin=B0CFDJC71F&ref_=dp_merchant_link
11	Amazon	Garqifert	https://www.amazon.com/sp?ie=UTF8&seller=A60IMC5BWIBNG&asin=B0BXRYGL3W&ref_=dp_merchant_link&isAmazonFulfilled=1

12	Amazon	Geiyuar	https://www.amazon.com/sp?ie=UTF8&seller=A3TJ3XJC8TOXK8&asin=B09R1JYN5F&ref_=dp_merchant_link
13	Amazon	GGadget Grove	https://www.amazon.com/sp?ie=UTF8&seller=A31W6YU0L13QWE&asin=B0FC511F4L&ref_=dp_merchant_link
14	Amazon	guixiulindianzi	https://www.amazon.com/sp?ie=UTF8&seller=A24ZPQN38SH98L&asin=B09Z2GCGDW&ref_=dp_merchant_link
15	Amazon	haerbinkufengkaishangmaoyouxiangongsi	https://www.amazon.com/sp?ie=UTF8&seller=A2D50C81TNEBHW&asin=B0DM1FV9TJ&ref_=dp_merchant_link
16	Amazon	hiseein	https://www.amazon.com/sp?ie=UTF8&seller=A2QVY18N17198V&asin=B0DGSZGC6X&ref_=dp_merchant_link
17	Amazon	HYRD-01	https://www.amazon.com/sp?ie=UTF8&seller=A1S2X14651QZKR&asin=B0DDSPBT4R&ref_=dp_merchant_link
18	Amazon	Iproperty	https://www.amazon.com/sp?ie=UTF8&seller=A65ZEB8YEOXJ9&asin=B0DKVMNFG7&ref_=dp_merchant_link
19	Amazon	JiaLe	https://www.amazon.com/sp?ie=UTF8&seller=A3K1NPKUBLX9JU&asin=B0BY4TDKXP&ref_=dp_merchant_link&isAmazonFulfilled=1
20	Amazon	jingtingxx	https://www.amazon.com/sp?ie=UTF8&seller=A2EJIJ5LS0G6HP&asin=B0C3VCGHG3&ref_=dp_merchant_link&isAmazonFulfilled=1
21	Amazon	Jingmingya-US	https://www.amazon.com/sp?ie=UTF8&seller=A3ACQBU2JLJNVU&asin=B0BWT6GR68&ref_=dp_merchant_link
22	Amazon	JHS-Tech	https://www.amazon.com/sp?ie=UTF8&seller=A1NPD3Y6U9IJ2E&asin=B0D9YJC33V&ref_=dp_merchant_link
23	Amazon	kelida	https://www.amazon.com/sp?ie=UTF8&seller=A1ZU4C4YYPDDE8&asin=B0F9B1T6NQ&ref_=dp_merchant_link

24	Amazon	libidotech	https://www.amazon.com/sp?ie=UTF8&seller=A18UO4E6HMMB60&asin=B09W2ZCJ1S&ref_=dp_merchant_link&isAmazonFulfilled=1
25	Amazon	Likeets	https://www.amazon.com/sp?ie=UTF8&seller=AU3JB6LVSK9R2&asin=B0DHWB1LNP&ref_=dp_merchant_link
26	Amazon	linglongy	https://www.amazon.com/sp?ie=UTF8&seller=AOKD0GR6KY7PF&asin=B0C65KHL25&ref_=dp_merchant_link&isAmazonFulfilled=1
27	Amazon	longfukangdianzi	https://www.amazon.com/sp?ie=UTF8&seller=ATLH0IL2D7HZZ&asin=B09YD4GKYG&ref_=dp_merchant_link
28	Amazon	life house	https://www.amazon.com/sp?ie=UTF8&seller=A3T6DTCJ89GFRZ&asin=B0C6JW1CNR&ref_=dp_merchant_link&isAmazonFulfilled=1
29	Amazon	Lucky Shop1234	https://www.amazon.com/sp?ie=UTF8&seller=A3TZJA7E4WUZB5&asin=B0D99XSKC3&ref_=dp_merchant_link&isAmazonFulfilled=1
30	Amazon	Mateisy8	https://www.amazon.com/sp?ie=UTF8&seller=A2JDJ03X3D8JYX&asin=B0DZPLMGTM&ref_=dp_merchant_link
31	Amazon	Muzagroo Art	https://www.amazon.com/sp?ie=UTF8&seller=A2RQIRF99YVI35&asin=B0DCBH77S5&ref_=dp_merchant_link&isAmazonFulfilled=1
32	Amazon	NicenicysUS	https://www.amazon.com/sp?ie=UTF8&seller=A2V7NOUEMQNY72&asin=B0BGKVM7PY&ref_=dp_merchant_link&isAmazonFulfilled=1
33	Amazon	Ninonly us	https://www.amazon.com/sp?ie=UTF8&seller=A10H884A7KII3K&asin=B0C2C36P5W&ref_=dp_merchant_link&isAmazonFulfilled=1
34	Amazon	Phicus	https://www.amazon.com/sp?ie=UTF8&seller=A2764ATB15UMMH&asin=B0BWYSXLCV&ref_=dp_merchant_link
35	Amazon	Povkufii	https://www.amazon.com/sp?ie=UTF8&seller=A13LQTBRWSDKL0&asin=B0F2MZ28G8&ref_=dp_merchant_link

36	Amazon	Pukalan	https://www.amazon.com/sp?ie=UTF8&seller=A257K0N0FQ3HDF&asin=B0CT85BMR1&ref_=dp_merchant_link&isAmazonFulfilled=1
37	Amazon	Qiansheng Elite Trade	https://www.amazon.com/sp?ie=UTF8&seller=A4WCWAWOG5Q7D&asin=B0F5VXVJCM&ref_=dp_merchant_link
38	Amazon	qhfly	https://www.amazon.com/sp?ie=UTF8&seller=A1MSJ4P64SQWP7&asin=B0CL2Z7B58&ref_=dp_merchant_link&isAmazonFulfilled=1
39	Amazon	Rasihay	https://www.amazon.com/sp?ie=UTF8&seller=A1QDVB77THQDF7&asin=B0DXFHPS2M&ref_=dp_merchant_link
40	Amazon	Risen-KDO	https://www.amazon.com/sp?ie=UTF8&seller=A3UDQJP3ASCL9E&asin=B09LXWBLBK&ref_=dp_merchant_link&isAmazonFulfilled=1
41	Amazon	Ruitaiming lighting	https://www.amazon.com/sp?ie=UTF8&seller=A33W2BAE4GLCUA&asin=B0DTBXPSX2&ref_=dp_merchant_link
42	Amazon	SeLucky	https://www.amazon.com/sp?ie=UTF8&seller=A1EBGM9PUWXYOO&asin=B0B4DDF2JW&ref_=dp_merchant_link&isAmazonFulfilled=1
43	Amazon	Situken	https://www.amazon.com/sp?ie=UTF8&seller=ARPATJHGMI4U9&asin=B0FBKV943Y&ref_=dp_merchant_link
44	Amazon	Surprise Treasure Shop	https://www.amazon.com/sp?ie=UTF8&seller=A35PM4MXLTHU6L&asin=B0F6V3X2QL&ref_=dp_merchant_link
45	Amazon	Tighall Store1	https://www.amazon.com/sp?ie=UTF8&seller=AOO6ULQDR5V4M&asin=B0B8GTM4RS&ref_=dp_merchant_link&isAmazonFulfilled=1
46	Amazon	Wiki Jooy	https://www.amazon.com/sp?ie=UTF8&seller=AO232SA4W5TIW&asin=B0BZV2NRDW&ref_=dp_merchant_link&isAmazonFulfilled=1
47	Amazon	WinEsc	https://www.amazon.com/sp?ie=UTF8&seller=A2B7DLPSTY87BH&asin=B09DG57Y31&ref_=dp_merchant_link&isAmazonFulfilled=1

48	Amazon	Wunyaqin	https://www.amazon.com/sp?ie=UTF8&seller=A2M56T866ENSVA&asin=B0F8C2XYQH&ref_=dp_merchant_link
49	Amazon	WUBY Clothing	https://www.amazon.com/sp?ie=UTF8&seller=A18HI2K10IR9OU&asin=B0DGKKX8MR&ref_=dp_merchant_link
50	Amazon	XINWEILAN	https://www.amazon.com/sp?ie=UTF8&seller=A3M83UPIHN07OE&asin=B0D7HJG8PW&ref_=dp_merchant_link&isAmazonFulfilled=1
51	Amazon	Yedatradingco	https://www.amazon.com/sp?ie=UTF8&seller=AWSJZYNM3TU12&asin=B0F89PW36C&ref_=dp_merchant_link
52	Amazon	Zippowolf	https://www.amazon.com/sp?ie=UTF8&seller=A3D7MDY6WSENMM&asin=B0DNHJ5K4K&ref_=dp_merchant_link