

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

Guangdongsheng Shunhechuanmei
Co., Ltd.,

Plaintiff,

v.

The Partnerships and
Unincorporated Associations
Identified on Schedule “A”,

Defendants.

Case No. 25-CV-1716

Hon. Jeffrey I Cummings

Hon. Mag. Jeannice W. Appenteng

**PLAINTIFF’S MOTION TO EXTEND
EX PARTE TEMPORARY RESTRAINING ORDER**

Plaintiff Guangdongsheng Shunhechuanmei Co., Ltd. (“Shunhechuanmei” or “Plaintiff”) hereby moves this Court to extend the Temporary Restraining Order (the “TRO”) entered by this Court in this action on April 9, 2025 (Dkt. Nos. 16-17). Plaintiff submits that good cause exists for granting the requested extension.

1. On April 11, 2025, Plaintiff secured a surety bond in the amount of \$34,000 as called for by the TRO, Dkt. No. 17.
2. On April 14, 2025, Plaintiff delivered the surety bond to the Court (Dkt. No. 18).

3. Plaintiff immediately served the TRO together with associated and targeted requests for production on Amazon.com on the same day, which is the only online platform in use by the Defendants in this case.

3. Consistent with the TRO, Plaintiff seeks the following discovery:

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

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 Online Marketplaces and Defendants' financial accounts, including Defendants' sales and listing history related to their respective Online Marketplaces; and

c. any financial accounts owned or controlled by Defendants, including their officers, agents, servants, employees, attorneys, and any persons acting in active concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, Alipay, Wish.com, Alibaba, Ant Financial, Amazon Pay, Temu.com, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

5. Consistent with the TRO, Plaintiff also requests Amazon.com:

a. locate all accounts and funds connected to Defendants' seller aliases, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in Exhibit 2 to the Declaration of Wei Gao, and any e-mail addresses provided for Defendants by third parties; and

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

6. At this time, Plaintiff has not received any data responsive to the discovery from Amazon.com, despite exercising diligence in serving the discovery and following up with Amazon.com.

7. As Plaintiff has not received the requested discovery identifying all the Defendants, Plaintiff has not been able to serve all the Defendants in this case.

8. Although the TRO provides that Amazon.com is required to comply with the Order within seven calendar days, in our experience, working with them, it typically takes them more than fourteen (14) calendar days to complete such a request for discovery.

9. The risks that Defendants will liquidate their relevant payment accounts and the financial assets contained in those accounts to avoid this enforcement action remains for the same reasons set forth in Plaintiff's initial *Ex Parte* Motion for Entry of a Temporary Restraining Order, Including a Temporary Injunction, a Temporary Asset Restraint and Expedited Discovery and the accompanying memorandum (Dkt. Nos. 6-7).

9. Plaintiff respectfully submits that the above circumstances constitute good cause to extend the TRO to provide more time for the Order to be fully effectuated.

10. Accordingly, Plaintiff requests that the Court extend the TRO for an additional fourteen (14) days, or until May 7, 2025, to ensure full compliance with the TRO by Amazon.com.

11. Plaintiff will move for a preliminary injunction shortly after Amazon.com responds to the discovery propounded on it. Without the data from Amazon.com, Plaintiff cannot provide notice to the defendants of the preliminary injunction hearing.

CONCLUSION

For the reasons set forth above, Plaintiff respectfully requests that the Court extend the TRO entered in this action (Dkt. No. 17) until and through May 7, 2025.

GUANGDONGSHENG SHUNHECH-
UANMEI CO., LTD.,

Date: April 15, 2025

By: /s/ Konrad Sherinian
An attorney for plaintiff

Attorneys for Plaintiff

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