

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

Copyright Rightsholder Identified in Exhibit 1,)	
)	
)	
Plaintiff,)	
)	Case No. 1:23-cv-04507
v.)	
)	Dist. Judge Matthew F. Kennelly
The Partnerships and Unincorporated Associations Identified on Schedule “A”,)	Mag. Judge Gabriel A. Fuentes
)	
Defendants)	

Plaintiff’s Motion for Entry of a Temporary Restraining Order and Expedited Discovery

NOW COMES Copyright Rightsholder Identified in Exhibit 1 (“Plaintiff”), by and through his undersigned counsel, and submits Motion for Entry of a Temporary Restraining Order and Expedited Discovery (the “*Ex Parte* Motion”).

I. Introduction

Plaintiff is requesting a temporary *ex parte* relief based on the actions of clear copyright infringement, false designation of origin, and unfair competition committed by the defendants identified in the Schedule “A” to the Complaint (collectively “Defendants”). As detailed and elaborated in the Complaint, Defendants are selling unauthorized and unlicensed products using pirated copies of Plaintiff’s registered copyright (the “Infringing Products”) through at least the fully interactive, e-commerce stores and online marketplaces identified within the Schedule A attached to the Complaint. Defendants utilize these online marketplaces to create seller aliases to increase their chances of avoiding detection by U.S. Customs and Border patrol.

Defendants, in part, explicitly target sales to Illinois residents by setting up and operating e-commerce stores using one or more seller aliases through which Illinois residents can purchase Infringing Products. The e-commerce stores operating under the seller aliases have similar and

legibly apparent characteristics that establish a common logical relationship between them. The purpose of Defendants operating under these numerous seller aliases is to conceal their identities and obfuscate the full scope of their coordinated infringement operation. Plaintiff must file this action to combat Defendants infringement of its copyright and the irreparable injury it continues to inflict on its brand and safeguard Illinois consumers from further purchasing infringing products over the internet. Defendants' unlawful activities should be restrained. Plaintiff respectfully requests that this Court issue *ex parte* a Temporary Restraining Order, Temporary Asset Restraint, and Expedited Discovery.

II. Background

a. Plaintiff's Business

Plaintiff specializes in the creation, manufacture, marketing, and sale of fire extinguisher products promoted and advertised in connection with Plaintiff's registered Plaintiff Work. [Dkt. 6-1] (the "Plaintiff Work"). Plaintiff is the owner of a valid copyright registration in the Plaintiff Work and has the exclusive right to market and sublicense the right to copy, reproduce, and display the valid registered Plaintiff Work and make derivative works thereof. *See*, Declaration of Rightsholder at ¶ 5. Plaintiff has invested substantial resources, time, money, and commercial effort in order to establish the goodwill of the Plaintiff's Products. The Plaintiff Work is indispensable to Plaintiff's business operations and Plaintiff maintains all lawful rights of title and interest in the Plaintiff Work and the rights granted therefrom.

b. Defendants' Unlawful Activities

Plaintiff has discovered numerous fully interactive ecommerce stores, including those operating under the Defendants' seller aliases, which have been offering for sale and selling infringing products in connection with the Plaintiff Work to consumers within this Judicial District as well as throughout the United States. Plaintiff's well-pleaded allegations regarding registration

patterns, similarities among the ecommerce stores operating under the Seller Aliases and the Infringing Products for sale thereon, and common tactics employed to evade enforcement efforts establish a logical relationship among the Defendants and that Defendants are interrelated. If Defendants elect to provide additional information regarding their identities or information related to their business enterprise based on copyright infringement, Plaintiff will appropriately amend its Complaint as necessary.

III. Argument

Defendants' purposeful, intentional, and unlawful conduct is causing and will continue to cause irreparable harm to Plaintiff's brand and business enterprise. Fed. R. Civ. P. 65(b) provides that this Court may issue an *ex parte* TRO where immediate and irreparable injury, loss, or damage will result to the applicant before the adverse party or that party's attorney can be heard in opposition. Fed R. Civ. P. 65(b). A TRO is appropriate in this matter because it will immediately stop Defendants' use of Plaintiff's copyright and preserve the status quo until a hearing may be held.

The TRO should be granted without notice in order to prevent further irreparable harm to Plaintiff. In the absence of a TRO without notice, Defendants can - and will - register new ecommerce stores under new aliases, move all of the assets to off-shore bank accounts outside the jurisdiction of this Court, and thereby frustrate and deprive Plaintiff of any opportunity to seek equitable relief. Rightsholder Decl. at ¶ 10-21. Courts recognize that civil actions against infringers present special challenges that warrant proceeding on an *ex parte* basis. Columbia Pictures Indus., Inc. v. Jasso, 927 F. Supp. 1075, 1077 (N.D. Ill. 1996) (observing that "proceedings against those who deliberately traffic in infringing products merchandise are often useless if notice is given to the infringers"). As such, Plaintiff requests that this Court issue the requested *ex parte* TRO.

This Court maintains original subject matter jurisdiction given the claims in this proceeding arise out of the Copyright Act. 17 U.S.C. § 501; 28 U.S.C. §§ 1338(a)-(b); 28 U.S.C. § 1331. Additionally, venue is proper pursuant to 28 U.S.C. § 1391.

This Court may properly exercise personal jurisdiction over Defendants since Defendants directly target business activities toward consumers in the United States, including Illinois, through at least the fully interactive, e-commerce stores operating under the seller aliases. Specifically, 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, accept payment in U.S. dollars and, on information and belief, have sold Infringing Products to residents of Illinois. *See*, Complaint at ¶¶ 8, 21. *See, e.g., Christian Dior Couture, S.A. v. Lei Liu et al.*, Case No. 15-cv-6324, at *6 (N.D. Ill. Nov. 17, 2015) (personal jurisdiction proper over defendant offering to sell alleged infringing product to United States residents, including Illinois; no actual sale required); *Monster Energy Company v. Wensheng*, 136 F. Supp. 3d 897, 905 (N.D. Ill. 2015), *citing*, *Dental Arts Lab., Inc. v. Studio 360 The Dental Lab, LLC*, 2010 WL 4877708, at *7 (N.D. Ill. Nov. 23, 2010) (“As long as one tortious act is committed in Illinois, the courts of the state, and thus this Court, may exercise personal jurisdiction over Defendant.”). Each of the Defendants is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the State of Illinois.

a. Legal Standard

District Courts within this Circuit hold that the standard for granting a TRO and the standard for granting a preliminary injunction are identical. *See, e.g., Charter Nat’l Bank & Trust v. Charter One Fin., Inc.*, 2001 WL 527404, at *1 (N.D. Ill. May 15, 2001) (citation omitted). A party seeking to obtain a preliminary injunction must demonstrate: (1) that its case has some likelihood of success on the merits; (2) that no adequate remedy at law exists; and (3) that it will suffer irreparable

harm if the injunction is not granted. *See, Ty, Inc. v. The Jones Group, Inc.*, 237 F.3d 891, 895 (7th Cir. 2001).

If these three conditions are satisfied then the Court must consider harm that the nonmoving party will suffer if preliminary relief is granted, balancing such harm against the irreparable harm the moving party will suffer if relief is denied. *Id.* Lastly, the Court should consider the potential effect on the public interest (non-parties) in denying or granting the injunction. *Id.* The Court then weighs all of these factors, “sitting as would a chancellor in equity,” when it decides whether to grant an injunction. *Abbot Labs. V. Mead Johnson & Co.*, 971 F.2d 6, 11 (7th Cir. 1992). The “sliding scale approach” the Court should implement reasons that the more likely plaintiff will succeed on the merits, the less balance of harms need favor the plaintiff’s motion. *Ty, Inc.*, 237 F.3d at 895.

b. Plaintiff is likely to succeed on the merits.

“To establish infringement, two elements must be proven: (1) ownership of a valid copyright, and (2) copying of constituent elements of the work that are original.” *Feist Publications, Inc. v. Rural Tel. Serv. Co.*, 499 U.S. 340, 361 (1991); *see also Peters v. West*, 692 F.3d 629, 632 (7th Cir. 2012).

Here, Plaintiff is likely to succeed on the merits of his copyright infringement claim. First, Plaintiff owns all exclusive rights for copyright of the Plaintiff Work. [Dkt. 6-1]; Rightsholder Decl. ¶ 5; see 17 U.S.C. § 501(b) (stating legal or beneficial owner of an exclusive right under a copyright is entitled to institute an action for any infringement). Second, Plaintiff has shown that Defendants have made unauthorized copies of the Plaintiff Work. Specifically, Defendants also deceive unknowing consumers by using an exact screenshot from the Plaintiff Work without authorization within the product images of their Defendant Internet Stores to attract customers. Rightsholder Decl. ¶ 6; *WGN Cont’l Broad. Co. v. United Video, Inc.*, 693 F.2d 622, 626 (7th Cir. 1982) (“Each

frame in a motion picture is covered by the copyright on the motion picture even though the frames are not intended to be viewed simultaneously”); *see also* Warner Bros. Ent. Inc. v. Random Tuesday, Inc., 2020 WL 12762735 at *13 (C.D. Cal. Nov. 9, 2020) (“The Complaint adequately alleges that Defendants’ use of screenshots and clips from the Gilmore Girls series constitutes copyright infringement.”). As a visual representation, Defendants have directly copied the Plaintiff Work for the Infringing Products listings, or, alternatively, Defendants’ representations of Plaintiff’s copyrights for the Infringing Products in the Defendant Internet Stores are strikingly similar, or at the very least substantially similar, to Plaintiff’s copyright for the Plaintiff’s Products and constitute unauthorized copying, reproduction, distribution, creation of a derivative work, and/or public display of Plaintiff’s copyrights for the Infringing Products.

c. There is no adequate remedy at law, and Plaintiff will suffer irreparable harm in the absence of preliminary relief.

Plaintiff is likely to suffer irreparable harm due to Defendants blatant and unlawful acts of copyright infringement. Defendants’ infringement of Plaintiff’s copyright threatens the Plaintiff’s established goodwill with customers and reputational harm. Rightsholder Decl. at ¶ 10-21. While loss of goodwill is “more commonly associated with trademark cases, [] it is applicable to copyright as well.” Ty, Inc. v. GMA Accessories, Inc., 132 F.3d 1167, 1173 (7th Cir. 1997). Thus, damage to a copyright holder’s goodwill “is unquantifiable and therefore irreparable.” Spinmaster, Ltd. v. Overbreak LLC, 404 F.Supp.2d 1097, 1111 (N.D. Ill. 2005); *see also*, USAHalal Chamber of Com., Inc. v. Best Choice Meats, Inc., 402 F. Supp. 3d 427, 437 (N.D. Ill. 2019) (quoting Re/Max N. Cent., Inc. v. Cook, 272 F.3d 424, 432 (7th Cir. 2001) (“The Seventh Circuit has ‘repeatedly held that damage to a trademark holder’s goodwill can constitute irreparable injury for which the trademark owner has no adequate legal remedy.”)); 17 U.S.C. §§ 502, 503 (providing for injunctive relief for copyright infringement; enjoining any use or exploitation by Defendants of their infringing work and

that any of Defendants' infringing products be impounded and destroyed). A plaintiff with a copyright infringement claim "has the right to protect their reputation as well as their sales from infringers." Spinmaster, 404 F.Supp.2d at 1111.

Irreparable injury "almost inevitably follows" when there is a high probability of confusion because such injury "may not be fully compensable in damages." Helene Curtis Industries, Inc. v. Church & Dwight Co., Inc., 560 F.2d 1325, 1332 (7th Cir. 1977) (citation omitted). "The Seventh Circuit and other courts have held that 'the most corrosive irreparable harm' attributable to copyright infringement is the victim's inability to control the nature and quality of the infringer's goods." Jefferson v. Johnson Publishing, Inc., 1992 WL 318615, at *2 (N.D. Ill. Oct. 28, 1992) (citing cases). As such, monetary damages are likely to be inadequate compensation for such harm. Ideal Indus., Inc. v. Gardner Bender, Inc., 612 F.2d 1018, 1026 (7th Cir. 1979). Defendants' unauthorized use of the registered Plaintiff Work has and continues to irreparably harm Plaintiff through diminished goodwill and brand confidence, damage to Plaintiff's reputation, loss of exclusivity, and loss of future sales. Rightsholder Decl. ¶¶ 10-21. The extent of the harm to Plaintiff's reputation and goodwill and the possible diversion of customers due to loss in brand confidence are both irreparable and incalculable, thus warranting an immediate halt to Defendants' infringing activities through injunctive relief. *See*, Promatek Industries, Ltd. v. Equitrac Corp., 300 F.3d 808, 813 (7th Cir. 2002) (finding that damage to plaintiffs' goodwill was irreparable harm for which plaintiffs had no adequate remedy at law); Gateway Eastern Railway Co. v. Terminal Railroad Assoc. of St. Louis, 35 F.3d 1134, 1140 (7th Cir. 1994) ("[S]howing injury to goodwill can constitute irreparable harm that is not compensable by an award of money damages.").

Finally, because Defendants are individuals and businesses who, upon information and belief, reside in the People's Republic of China or other foreign jurisdictions with no U.S. presence, all monetary based judgement is highly likely to be uncollectible. *E.g.*, Aevoe Corp. v. AE Tech Co.,

Ltd., 2012 WL 760692, at *5 (D. Nev. Mar. 7, 2012) (“[A] finding of irreparable harm was not clearly erroneous because it also found that since AE Tech is a foreign corporation, money damages would be insufficient.”); Otter Prods. v. Anke Group Indus. Ltd., 2013 WL 5910882, at *2 (D. Nev. Jan. 8, 2013) (“because Anke has no presence in the United States, it may be difficult or impossible for Otterbox to enforce a monetary judgement against Anke”); Bushnell, Inc. v. Brunton Co., 673 F. Supp.2d 1241, 1263 (D. Kan. 2009) (granting preliminary injunction; “the prospect of collecting money damages from a foreign defendant with few to no assets in the United States tips in favor of a finding of irreparable harm”); Nike, Inc. v. Fujian Bestwinn Industry Co., Ltd., 166 F. Supp. 3d 1177, 1179 (D. Nev. 2016) (“[B]ecause Bestwinn has no presence in the United States, it may be difficult or impossible for NIKE to recover a money judgement against Bestwinn”). For the reasons stated above, Plaintiff will suffer immediate and irreparable injury, loss, or damage if an *ex parte* Temporary Restraining Order is not issued in accordance with Fed. R. Civ. P. 65(b)(1). Rightsholder Decl. at ¶ 10-21.

d. The balancing of harms weighs in Plaintiff's favor and the public interest is served by entry of the injunction.

As noted above, if the Court is satisfied that Plaintiff has demonstrated (1) a likelihood of success on the merits, (2) no adequate remedy at law, and (3) the threat of irreparable harm if preliminary relief is not granted, then it must next consider the harm that Defendants will suffer if preliminary relief is granted, balancing such harm against the irreparable harm Plaintiff will suffer if relief is denied. Ty, Inc., 237 F.3d at 895. As willful infringers, Defendants are entitled to little equitable consideration. This is because any harm to Defendants that could possibly result from a temporary restraining order is self-inflicted, and Plaintiff has not unduly delayed in bringing his action. Defendants took a calculated risk when they engaged in copyright infringement and their supposed “harm” should be given minimal deference.

As Plaintiff has demonstrated, Defendants have been profiting from the sale of infringing products. The balance of equities clearly leans in Plaintiff's favor. *See, Ideal Indus., Inc. v. Gardner Bender, Inc.*, 612 F.2d 1018, 1025 (7th Cir. 1979) (“The existence of irreparable injury is positively supported by the fact that the alleged trademark and the infringing use are identical, that the products are the same, and that the markets are the same. These factors by themselves are indicative of irreparable injury.”); *National Financial Partners Corp. v. Paycom Software, Inc.*, 2015 WL 3633987, at *12 (N.D. Ill. June 10, 2015) (compelling evidence of consumer confusion supports a finding of irreparable harm).

Defendants will suffer no harm that was not warranted by their infringing actions if the Court grants Plaintiff's request for a temporary restraining order; Defendants “cannot complain” of being forced to cease their infringement. *Warner Bros. Entm't, Inc. v. WTV Sys.*, 824 F. Supp. 2d 1003, 1014-15 (C.D. Cal. 2011). Plaintiff's risk of serious irreparable harm greatly outweighs the minor harm to Defendants. The TRO would also be in the best interest of the public to safeguard consumers from further unlawful infringement on behalf of Defendants. *See also, Apple Computer, Inc. v. Franklin Computer Corp.*, 714 F.2d 1240, 1255 (3rd Cir. 1983) (“[I]t is virtually axiomatic that the public interest can only be served by upholding copyright protections and correspondingly, preventing the misappropriation of skills, creative energies, and resources which are invested in the protected work.”)

e. Plaintiff is entitled to equitable relief.

In addition to this Court's inherent authority to issue injunctive relief, the Copyright Act specifically authorizes courts to “grant temporary and final injunctions on such terms as it may deem reasonable to prevent or restrain infringement of a copyright” (17 U.S.C. § 502) and provides that any of Defendants' infringing products be impounded and destroyed. (17 U.S.C. § 503).

Furthermore, Rule 65(b) of the Federal Rules of Civil Procedure provides that a court may issue a temporary restraining order without notice where facts show that the movant will suffer immediate and irreparable injury, loss, or damage before the adverse party can be heard in opposition. Moreover, under federal rules this Court has the power to bind any third parties, such as domain name registries and financial institutions, who are in active concert with the Defendants or who aid and abet Defendants and are given actual notice of the order. Fed. R. Civ. P. 65(d)(2)(C). The facts in this case warrant such relief.

i. A temporary restraining order immediately enjoining Defendants' unauthorized and unlawful use of the Plaintiff's Intellectual Property is appropriate.

Plaintiff requests a temporary injunction requiring the Defendants to immediately cease all use of the Plaintiff Work on or in connection with all Defendant Online Stores. Such relief is necessary to stop the ongoing harm to the Plaintiff's Work and associated goodwill, as well as harm to consumers, and to prevent the Defendants from continuing to benefit from their unauthorized use of the registered Plaintiff Work.

The need for *ex parte* relief is necessitated by today's global economic conditions where infringers can operate anonymously over the internet and often escape the jurisdictional reach of the authorities. Plaintiff is presently unaware of both the true identities and locations of the Defendants, as well as other ecommerce stores used to distribute Defendants' Infringing Products. Courts have often authorized immediate injunctive relief in similar cases involving the sale of infringing products. *See, e.g., Swarovski Aktiengesellschaft et al v. The P'ships and Unincorporated Assocs. Identified on Schedule "A"*, Case No. 18-cv-07784 Dkt. 24 (N.D. Ill. Nov. 29, 2018) (granting *ex parte* motion for temporary restraining order); *Millennium IP, Inc., et al. v. The P'ships and Unincorporated Assocs. Identified on Schedule "A"*, No. 17-cv-08201 Dkt. 12 (N.D. Ill. Nov. 13, 2017) (unpublished) (same); *Pink Floyd (1987) Limited v. The P'ships and Unincorporated*

Assocs. Identified on Schedule “A”, No. 18-cv-03996 Dkt. 15 (N.D. Ill. June 19, 2018); Polyblank Designs Ltd. v. The P’ships and Unincorporated Assocs. Identified on Schedule “A”, No. 19-cv-00591 Dkt. 15 (N.D. Ill. Feb. 15, 2019); Mon Cheri Bridals, LLC v. Does 1-349, No. 18-cv-05011 Dkt. 18 (N.D. Ill. July 31, 2018).

ii. Preventing the wrongful transfer of assets is appropriate.

Plaintiff requests an *ex parte* restraint of Defendants’ assets so that Plaintiff’s right to an equitable accounting of Defendants’ profits from its sales of infringing products is not frustrated. Issuing an *ex parte* restraint will ensure Defendants’ compliance. If such a restraint is not granted in this case, Defendants may ignore their instructions from the Court and merely transfer financial assets overseas to accounts out of reach of this jurisdiction. Specifically, upon information and belief, the Defendants in this case hold most of their assets in offshore accounts, making it simple to dispose or remove assets, which will render an accounting by Plaintiff to be ineffective and meaningless.

Courts have the inherent authority to issue prejudgment asset restraints when a plaintiff’s complaint seeks relief in equity. Black & Decker Corp. v. Positec USA Inc., 118 F. Supp. 3d 1056, 1066 (N.D. Ill. 2015), *citing*, Reebok Int’l v. Marnatech Enters., 970 F.2d 552, 559 (9th Cir. 1992). Plaintiff has demonstrated a strong likelihood of success on the merits of its copyright infringement claim, and Plaintiff is entitled to recover the extent of Defendants total profits. 17 U.S.C. § 504(b). Plaintiff seeks, among other relief, that Defendants account for and pay to Plaintiff all profits realized by Defendants due to their unlawful acts.

This Court regularly issues asset restraining orders for entire financial accounts in cases involving the sale of products by way of copyright infringement. *See, e.g.*, Pink Floyd (1987) Limited; Lorillard Tobacco Co. v. Montrose Wholesale Candies, 2005 WL 3115892, at *13 (N.D. Ill. Nov. 8, 2005), *citing*, Grupo Mexicano, de Desarrollo, S.A. v. Alliance Bond Fund, 527 U.S. 308, 325 (1999)

(finding that an asset freeze was warranted when the plaintiff sought a disgorgement of profits, an equitable remedy). This Court should therefore grant Plaintiff's request for a prejudgment asset freeze to preserve the effectiveness of the relief sought.

f. Plaintiff is entitled to expedited discovery.

“Federal courts have the power to order, at their discretion, the discovery of facts necessary to ascertain their competency to entertain the merits.” Vance v. Rumsfeld, 2007 WL 4557812, *6 (N.D. Ill. Dec. 21, 2007), *quoting*, Oppenheimer Fund, Inc. v. Sanders, 437 U.S. 340, 351 (1978). Courts have wide latitude in determining whether to grant a party's request for discovery. *Id.* (citation omitted). Moreover, courts have broad power over discovery and may permit discovery in order to aid in the identification of unknown defendants. *See*, Fed. R. Civ. P. 26(b)(2); Gillespie v. Civiletti, 629 F.2d 637, 642 (9th Cir. 1980).

Defendants go to great lengths to conceal their identities and obfuscate the scope of their operations including, without limitation, by omitting accurate identifiable information from the Defendant Online Stores. Plaintiff requires this information and, otherwise, an asset restraint would be ineffective where the bank or other payment account containing the assets was unknown.

Plaintiff respectfully requests expedited discovery to discover bank and payment system accounts which Defendants use for their illegitimate sales operations. The expedited discovery requested in Plaintiff's proposed Temporary Restraining Order is limited to include only what is essential to prevent further irreparable harm. Discovery of these sales and financial accounts so that they can be temporarily restrained is necessary to ensure that these activities will be contained. *See, e.g., Deckers Outdoor Corp. v. The P'ships, et al.*, No. 15-cv-3249 (N.D. Ill. April 21, 2015) (Dkt. 19) (unpublished). Plaintiff's seizure and asset restraint may have little meaningful effect without the requested relief. Accordingly, Plaintiff respectfully requests that expedited discovery be granted.

g. A bond should secure the injunctive relief.

The posting of security upon issuance of a TRO or preliminary injunction is vested in the Court's sound discretion. USA-Halal Chamber of Commerce, Inc. v. Best Choice Meats, Inc., 402 F. Supp. 3d 427, 441 (N.D. Ill. 2019). Because of the strong and unequivocal nature of Plaintiff's evidence of copyright infringement, Plaintiff respectfully requests that this Court require Plaintiff to post a bond of no more than ten thousand U.S. dollars (\$10,000.00). *See, e.g., Deckers Outdoor Corporation v. The P'ships, et al.*, No. 15-cv-3249 (N.D. Ill. April 21, 2015) (unpublished) (\$10,000 bond).

IV. Conclusion

Plaintiff's business continues to be irreparably harmed by Defendants' business enterprise based on infringement of the Plaintiff Work. Without entry of the requested relief, Defendants infringement of the Plaintiff's copyright in connection with the making, using, offering to sell, selling, or importing of the infringing products will continue to irreparably harm Plaintiff. Therefore, entry of an *ex parte* order is necessary. In view of the foregoing, Plaintiff respectfully requests that this Court enter a Temporary Restraining Order in the form submitted herewith.

Dated: July 16, 2023

Respectfully Submitted

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