

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

Yiwu Mode E-Commerce Co Ltd.,)	
)	
Plaintiff,)	
)	Case No. 1:24-cv-00683
v.)	
)	Dist. Judge Lindsay C. Jenkins
The Individuals, Partnerships, and)	
Unincorporated Associations Identified on)	Mag. Judge Jeffrey Cole
Schedule A,)	
)	
Defendants.)	

Plaintiff's Renewed Motion for Expedited Discovery and Electronic Service of Process

NOW COMES Yiwu Mode E-Commerce Co Ltd. ("Plaintiff"), by and through its undersigned counsel, and hereby moves this honorable Court to permit necessary, limited expedited discovery, and pursuant to Federal Rule of Civil Procedure 4(f)(3), authorization to serve process by electronically publishing a link to the Complaint and other relevant documents on a website and by sending an e-mail to e-mail addresses identified to Plaintiff by third-parties, namely AliExpress that includes a link to said website.

1. Plaintiff filed the present case on January 26, 2024 [Dkt. 1].
2. Plaintiff concurrently filed a motion for, *inter alia*, expedited discovery and leave to serve the defendants in the case electronically. For good cause, this relief was granted, as part of the temporary restraining order (TRO), on February 1, 2024. [Dkt. 9].
3. On or about the expiration of the TRO, Plaintiff transitioned to current counsel-of-record.
4. The TRO, prior to its expiration, was not served upon third-party AliExpress, on which Defendant Nos. 26-57 operated.
5. The other third-party platforms in the case - Amazon, eBay, Temu, and Walmart - were served with the TRO and provided expedited discovery. The defendants on those platforms were

served with process and thereafter enjoined by the preliminary injunction. [Dkts. 16-17, 22].

6. Plaintiff requires the Court's leave, again, to obtain expedited discovery from third-party platform AliExpress, for the same reasons as set forth in Plaintiff's motion for entry of temporary restraining order and supporting material [Dkts. 6-8], which are incorporated by reference herein.
7. AliExpress has expressed that it requires an extant court order prior to producing registration and other information regarding the AliExpress defendants in the case. **Exhibit 1.**

WHEREFORE, Plaintiff respectfully requests that the Court grant the following relief:

- A.** That the Court enter an order granting Plaintiff expedited discovery, and permission to serve the AliExpress defendants via e-mail and electronic publication, in the form submitted herewith;
- B.** Any further and additional relief that the Court deems necessary and appropriate.

Dated: May 31, 2024

/s/Adam E. Urbanczyk
Adam E. Urbanczyk
AU LLC
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Chicago, IL 60661
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Counsel for Plaintiff

Exhibit 1



Adam Urbanczyk <adamu@au-llc.com>

Yiwu Mode - 24-cv-00683 (NDIL), expedited discovery

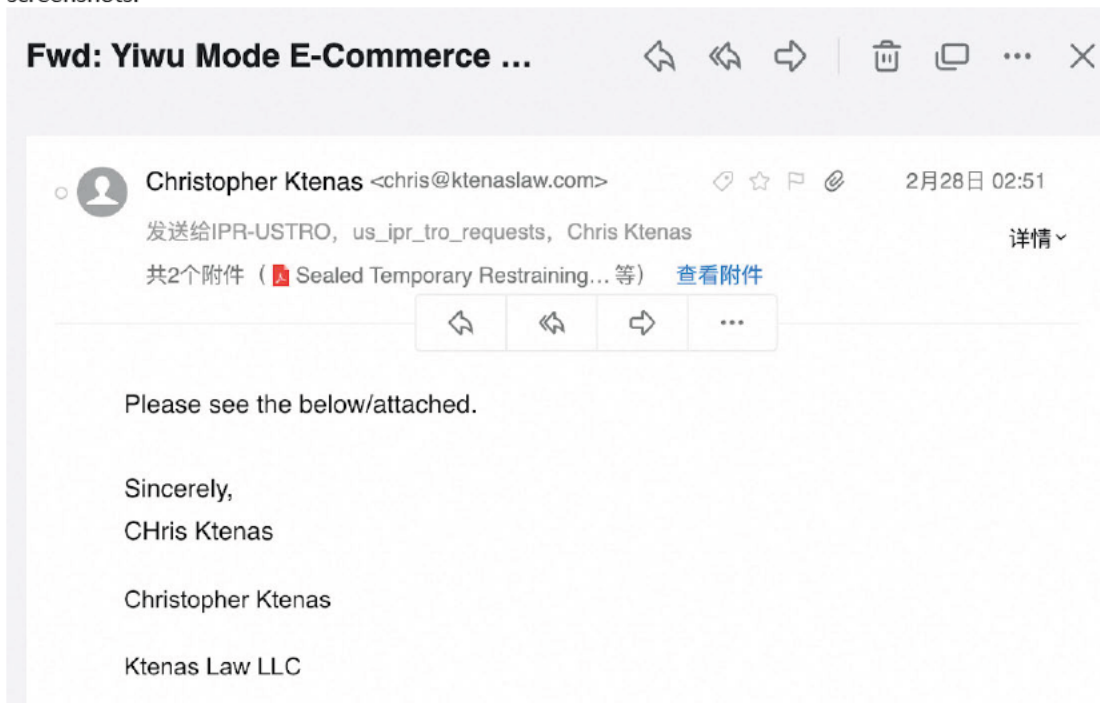
IPR-USTRO [REDACTED]
Reply-To: IPR-USTRO [REDACTED]
To: "Adam E. Urbanczyk" <adamu@au-llc.com>
Cc: Brian Swift <brians@au-llc.com>, TM Enforcement <enforcement@au-llc.com>

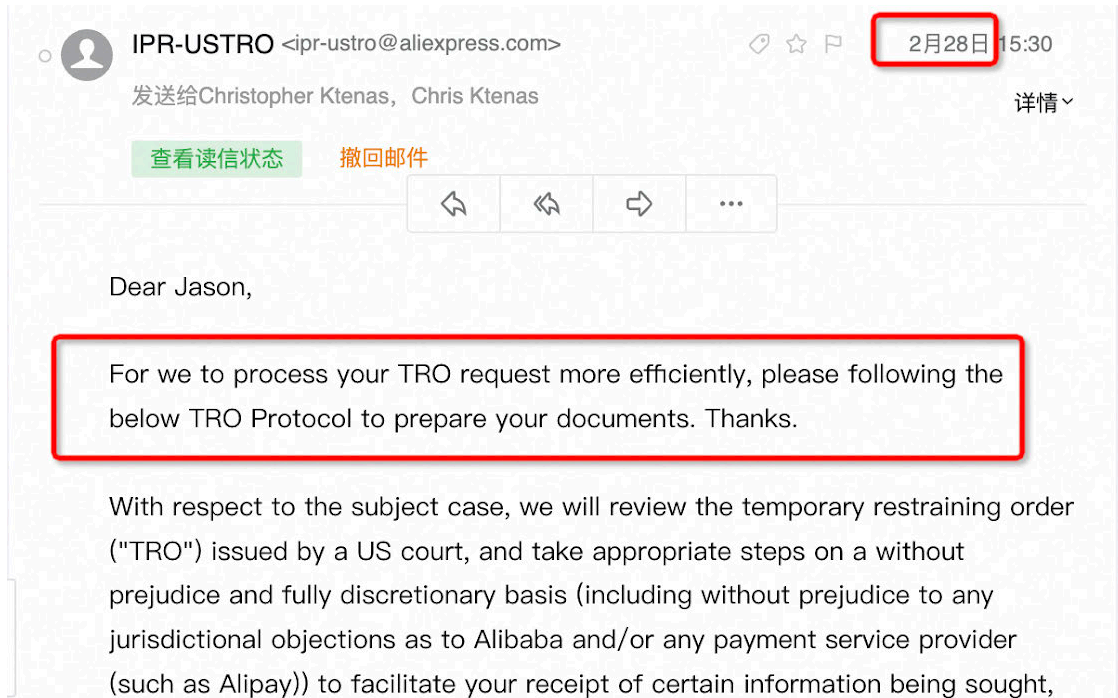
Mon, Apr 22, 2024 at 8:26 PM

Dear Adam,

This is AliExpress Legal team.

For this case, we received the TRO and Schedule A from plaintiff's counsel side on February 28, and we sent our TRO Protocol promptly on that day. However, we have not received any other materials from the plaintiff's side anymore. Please see below screenshots.





For this case, if you still want the platform to process this request, please ensure that there is a valid court order first. And we will share you our TRO protocol to guide you how to prepare relevant materials so the platform could process in time.

Best regards,
AliExpress IPR Legal Team

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发件人: Adam E. Urbanczyk <adamu@au-llc.com>
 发送时间: 2024年4月20日(星期六) 13:39
 收件人: US_IPR_TRO_Requests<[REDACTED]>
 抄 送: "IPR-USTRO"<[REDACTED]> Brian Swift<brians@au-llc.com>; TM Enforcement<enforcement@au-llc.com>
 主 题: Yiwu Mode - 24-cv-00683 (NDIL), expedited discovery

Hello,

We are new, substitute counsel for Yiwu Mode E-Commerce Co Ltd, the plaintiff in the 24-cv-00683 case pending in the U.S. District Court for the Northern District of Illinois. Some of the defendants in the case are AliExpress storefronts, and a TRO was entered in the case (attached). I believe plaintiff's former counsel provided this to AliExpress, however the requested account data for the defendants does not seem to have been provided.

Can you please confirm whether it was provided, or if not provide us with the account and sales information for the identified defendants?

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Adam E. Urbanczyk

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