

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

Lulu Cheng,)	
)	Case No.: 1:25-cv-03300-JPB
v.)	
)	
AIWEN CHEN, et al.,)	
)	
Defendants.)	

Plaintiff’s Motion for Entry of a Preliminary Injunction

NOW COMES LULU CHENG (“Plaintiff”) and hereby moves this Court to convert the previously-entered and extended temporary restraining order, that included a temporary injunction against Defendants enjoining the manufacture, importation, distribution, offering for sale, and sale of infringing and counterfeit products, a temporary asset restraint, expedited discovery, into a preliminary injunction.

In support of this Motion, Plaintiff submits the accompanying Memorandum of Law and the Declaration of Adam E. Urbanczyk filed concurrently herewith. A proposed Order is also submitted with this Motion.

Dated: July 31, 2025

Respectfully submitted,

/s/Adam E. Urbanczyk
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Memorandum of Law in Support of Plaintiff’s Motion for Entry of a Preliminary Injunction Order Including a Temporary Asset Restraint

Plaintiff submits this Memorandum in support of its Motion for Entry of a Preliminary Injunction Order including a temporary asset restraint,

I. Introduction

Plaintiff Lulu Cheng (“Plaintiff”) has brought the present action for federal trademark infringement, counterfeiting, and false designation of origin against the defendants identified in the Complaint (collectively, the “Defendants”). As alleged in Plaintiff’s Complaint, Defendants are offering for sale and/or selling unauthorized and unlicensed products using counterfeit and infringing versions of Plaintiff’s federally registered trademarks (the “Counterfeit Products”) through the fully-interactive e-commerce stores operating under the seller aliases identified in the Complaint (the “Seller Aliases”).

On July 8, 2025, this Court granted Plaintiff’s *ex parte* motion for entry of a temporary restraining order (“TRO”). [Dkt. 9]. The TRO authorized Plaintiff to

provide serve Defendants and provide Defendants notice of these proceedings by electronically publishing a link to the Complaint, the TRO, and other relevant documents on a website and sending an email to the email addresses provided by third parties (e.g., Amazon) that included a link to said website. [Dkt. 9, at ¶ 7]. Pursuant to the TRO and since the TRO was entered, Amazon accounts associated with the Defendant Online Stores have been preserved. *See*, Declaration of Adam Urbanczyk ¶ 2 . Plaintiff respectfully requests this Court to convert the TRO to a preliminary injunction against the Defendants so that the Defendants remain enjoined from reproducing, distributing, displaying, or otherwise exploiting without authorization the YAYASHI Trademark during the pendency of this litigation. As part of the preliminary injunction, Plaintiff requests that Defendants' Amazon payment accounts remain preserved until completion of these proceedings or until further order of the Court.

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. Courts addressing similar allegations of e-Commerce infringement have also issued preliminary injunctions following a temporary restraining order. *See, e.g.,* ABG-SI

LLC v. AAA Fashion trend, et al., No. 1:25-cv-03544-SDG Dkt. 18 (N.D. Ga. July 14, 2025)

i. This Court has already found that the requirements for entry of a preliminary injunction have been satisfied.

In the Eleventh Circuit, the standard for entering a preliminary injunction is identical to the standard for entering a TRO, and in this case, the requirements for entry of a TRO and thus the requirements for entry of a preliminary injunction have been satisfied. *See, e.g., Doe 1 v. Bondi*, 2025 WL 1482733 at *6 (N.D. Ga. May 2, 2025) (“The standard for obtaining a TRO is identical to that of obtaining a preliminary injunction.”). Generally, a party seeking to obtain a preliminary injunction or TRO must demonstrate the following four factors: : (1) it has a substantial likelihood of success on the merits; (2) the moving party will suffer irreparable injury if the order is not granted; (3) that the threatened injury to the plaintiff outweighs the harm the relief would inflict on the non-movant; and (4) entry of the order would not be adverse to the public interest. Schiavo ex rel. Schindler v. Schiavo, 403 F.3d 1223 (11th Cir. 2005); Cathedral Art Metal Co. v. Divinity Boutique, LLC, 2018 WL 566510 at *4 (N.D. Ga. Jan. 26, 2018) (applying four-part test and granting preliminary injunction in a Lanham Act case). Accordingly, because this Court has already entered a TRO against Defendants,

this Court has already found the requirements for entry of the preliminary injunction have been met. [Dkt. 9, at ¶ B9-12, 14].

ii. The equitable relief sought, including asset preservation, remains appropriate.

The Lanham Act authorizes this Court to enter injunctive relief “according to principles of equity and upon such terms as the court may deem reasonable, to prevent violation of any right of the registrant of a mark.” 15 U.S.C. § 1116(a). Moreover, 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). Accordingly, Plaintiff requests conversion of the TRO into a preliminary injunction so that Defendants’ infringing activities remain stymied and their account in U.S.-associated financial institutions remains retrained and frozen. Since the TRO’s entry, Amazon has provided Plaintiff with information including the identity of payment accounts linked to the Defendant Online Store which were offering for sale and/or selling Infringing Products. Urbanczyk Decl. ¶ 2. In the absence of a preliminary injunction, Defendant will be motivated to and may move assets from its U.S.-associated payment accounts, including Amazon accounts, to an offshore account or otherwise transferred beyond recovery. Therefore,

Defendants' assets should remain restrained and preserved for the remainder of these proceedings.

A court can issue an asset freeze when the case seeks equitable relief. The Lanham Act allows a plaintiff, "subject to the principles of equity, to recover...defendant's profit." 15 U.S.C. § 1117(a). Here, Plaintiff's Complaint is seeking both an equitable accounting of Defendants' profits from their sales of Counterfeit Products and an award of attorney's fees, which are both equitable remedies. Levi Strauss & Co. v. Sunrise Intern. Trading Inc., 51 F.3d 982, 987 (11th Cir. 1995) ("we conclude that the district court had the authority to freeze those assets which could have been used to satisfy an equitable award of profits."); Federal Trade Commission v. United States Oil and Gas Corp., 748 F.2d 1431, 1433-34 (11th Cir. 1984); Wheless v. Gelzer, 765 F. Supp. 741, 743 (N.D. Ga. 1991) (holding that request for attorney's fees and monetary awards that are restitutionary in nature are equitable). As such, an order continuing to temporarily preserve the Defendants' assets should be entered so as to preserve the effectiveness of the equitable relief sought. Levi Strauss & Co (concluding that "the district court had the authority to freeze those assets which could have been used to satisfy an equitable award of profits" under the Lanham Act); CSC Holdings, Inc. v. Redisi, 309 F.3d 988 (7th Cir. 2002) ("since the assets in question...were the profits of the [defendants] made by unlawfully stealing [the

plaintiffs'] services, the freeze was appropriate and may remain in place pending final disposition of this case."); Reebok Int'l Ltd. v. Marnatech Enters., Inc., 970 F.2d 552, 559 (9th Cir. 1992) ("[B]ecause the Lanham Act authorizes the district court to grant [plaintiff] an accounting of [defendant's] profits as a form of final equitable relief, the district court had the inherent power to freeze [defendant's] assets in order to ensure the availability of that final relief.").

III. Conclusion

In light of the foregoing and this Court's previous entry of the TRO, Plaintiff respectfully requests this Court to enter the preliminary injunction in substantially the same form as provided to the Court in the form submitted herewith.

Dated: July 31, 2025

Respectfully submitted,

/s/Adam E. Urbanczyk
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Declaration of Adam E. Urbanczyk

I, Adam E. Urbanczyk, in the City of Sarasota, in the State of Florida declare as follows:

1. I am an attorney at law, duly admitted to practice before, *inter alia*, the Courts of the State of Georgia and the U.S. District Court for the Northern District of Georgia. I am an attorney for Plaintiff Lulu Cheng (“Plaintiff”). Except as otherwise expressly stated to the contrary, I have personal knowledge of the following facts and, if called as a witness, I could and would competently testify to the following:

2. Pursuant to the temporary restraining order [Dkt. 4] and since the temporary restraining order’s entry, to my information Amazon payment accounts associated with the Defendant online storefront have been restrained and preserved, and the Counterfeit Product ASINs have been disabled. Sales and account information for Defendants was produced by Amazon on July 17, 2025.

3. Per discovery provided by Amazon, across all Defendants the average sales volume of Counterfeit Products alone (\$32,156.68) is approximately 771% greater than the average of the restrained balances (\$4,173.32).
4. The Defendants were served with process per the terms of the TRO on July 31, 2025 [Dkt. 47].

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed this July 31, 2025

/s/Adam E. Urbanczyk
Adam E. Urbanczyk

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[proposed] Preliminary Injunction Order

This matter is before the Court on Plaintiff’s request for a preliminary injunction. The Court previously entered a temporary restraining order (TRO) against defendants identified in the Complaint (the “Defendants”) and using at least the online marketplace accounts identified in **Exhibit A** hereof (the “Defendant Online Stores”) on July 8, 2025¹ and authorized Plaintiff to service Defendants by electronic means.² The TRO was extended for good cause on July 22, 2025.³ The Defendant have all been served with process.⁴

This Court having heard the evidence before it hereby GRANTS Plaintiff’s Motion for Entry of Preliminary Injunction (“Motion”). The Court finds that Plaintiff has established the following:

¹ [Dkt. 9]
² [Dkt. 10]
³ [Dkt. 11]
⁴ [Dkt. 47]

1. It has a substantial likelihood of success on the merits of its trademark counterfeiting and infringement claims given that:
 - a. It owns a valid and enforceable federal trademark registrations for the YAYASHI Trademark (U.S. Reg. No. 7,587,215);
 - b. The counterfeit and infringing products advertised and offered for sale by t Defendants are neither genuine nor authorized by Plaintiff;
 - c. The Defendants are using marks that are either colorable imitations of Plaintiff's marks or spurious marks that are identical with or substantially indistinguishable from Plaintiff's marks, in commerce, on or in connection with the advertising, offering for sale, or sale of counterfeit and infringing products; and
 - d. The Defendants' use of the YAYASHI Trademark or colorable imitations thereof is likely to cause consumer confusion, mistake, or deception as to the source or origin of the counterfeit and infringing products.
2. Plaintiff will suffer irreparable harm if the injunction does not issue. *See*, 15 U.S.C. § 1116(a) (entitling the plaintiff to “a rebuttable presumption of irreparable harm...upon a finding of likelihood of success on the merits”). Moreover, the continued sale of counterfeit and infringing products threatens Plaintiff with the loss of its reputation and of consumer goodwill.

3. The balance of the harms weighs in favor of granting the injunction given that the threatened injury to Plaintiff's reputation and goodwill absent an injunction outweighs any potential financial harm that the Defendants may suffer as a result of the injunction.
4. The requested injunction would serve the public interest. Avoidance of consumer confusion is in the public interest, particularly when consumers are misled as to the quality, source, and composition of counterfeit and infringing products.

Plaintiff has established that a preliminary injunction is warranted, and the Defendants have failed to show good cause why a preliminary injunction should not issue. Plaintiff's motion for a preliminary injunction is accordingly

GRANTED as to the Defendants listed in Exhibit A, as follows:

1. Defendants, their officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be preliminarily enjoined and restrained from:
 - a. using the YAYASHI Trademark or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine YAYASHI product or not authorized by Plaintiff to be sold in connection with the YAYASHI Trademark;

- b.** passing off, inducing, or enabling others to sell or pass off any product as a genuine YAYASHI product or any other product produced by Plaintiff, that is not Plaintiff's or not produced under the authorization, control or supervision of Plaintiff and approved by Plaintiff for sale under the YAYASHI Trademark;
- 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.** further infringing the YAYASHI Trademark and damaging Plaintiff's commercial goodwill;
- e.** otherwise competing unfairly with Plaintiff in any manner;
- f.** 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 bear any of Plaintiff's trademarks, including the YAYASHI Trademark, or any reproductions, counterfeit copies, or colorable imitations thereof; and

- g.** using, linking to, transferring, selling, exercising control over, or otherwise owning or operating the infringing webstores, websites, or any other domain name that is being used to sell or is the means by which Defendants could continue to sell Counterfeit YAYASHI products.
- 2.** Defendants shall not transfer or dispose of any money or other of Defendants' assets in any of Defendants' financial accounts.
- 3.** Defendants and any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of the Defendant Online Stores or other online marketplace accounts operated by Defendants, including, without limitation, any online marketplace platforms such as Amazon, eBay, web hosts, sponsored search engine or ad-word providers, credit cards, banks, merchant account providers, third party processors and other payment processing service providers such as PayPal and Amazon Payments, and Internet search engines such as Google, Bing and Yahoo (collectively, the "Third-Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:
- a.** the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or

- participation with them, including all known contact information, including any 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 Defendant Online Stores and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Defendant Online Stores;
 - c.** any of the Defendant Online Stores;
 - d.** any other online marketplace accounts registered by Defendants; and
 - e.** any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in 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 and Amazon Pay, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

4. Upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including the Third-Party Providers as defined in Paragraph 3, shall within five (5) business days after receipt of such notice:
 - a. disable and cease providing services being used by Defendants, currently or in the future, to engage in the sale of goods using the YAYASHI Trademark;
 - b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the YAYASHI Trademark; and
 - c. take all steps necessary to prevent links to the Defendant Online Stores identified on Exhibit A from displaying in search results, including, but not limited to, removing links to the Defendant Online Stores' offers for counterfeit and infringing goods using the YAYASHI Trademark from any search index.

5. Upon Plaintiff's request, those with notice of this Order, including the Third Party Providers as defined in Paragraph 3, shall within seven (7) calendar days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the YAYASHI Trademark.

6. Any Third Party Providers, including PayPal, Alipay, Alibaba, Ant Financial, Wish.com, and Amazon Pay, shall, within seven (7) calendar days of receipt of this Order:
 - a. locate all accounts and funds connected to Defendants or the Defendant Online Stores, including, but not limited to, any PayPal or Amazon Payment accounts connected to the Defendant Online Stores identified in Exhibit A hereto and any e-mail addresses provided for Defendants by third parties; and
 - b. restrain and enjoin any such accounts or funds that are not U.S. based from transferring or disposing of any money or other of Defendants' assets until ordered by this Court.
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), by electronically publishing a link to the Complaint, this Order and other relevant documents on a website and by sending an email to the email addresses identified by third parties, that includes a link to said website and notice of this action. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendants receive from payment processors, 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.

8. The \$10,000 bond posted by Plaintiff shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

United States District Judge

EXHIBIT A**LIST OF ALL NAMED DEFENDANTS SUBJECT TO ORDER**

Store Name	Store URL	Listing URL
Aiwen chen	https://www.amazon.com/sp?ie=UTF8&seller=AGUK1K15CZ1TA	https://www.amazon.com/Toothpaste-Fresh-Breath-Stain-Removal/dp/B0CZHSPMQJ
AllegoYuky	https://www.amazon.com/sp?ie=UTF8&seller=A3CQ98JRNC70NA	https://www.amazon.com/Probiotic-Toothpaste-Probiotics-Whitening-Cleaning/dp/B0D9C2SRP4
Baizuan	https://www.amazon.com/sp?ie=UTF8&seller=A1RT0GK8Y4NPT5	https://www.amazon.com/whitening-Toothpaste-brightening-probiotic-Removing/dp/B0DGH1J7TB
Chauming	https://www.amazon.com/sp?ie=UTF8&seller=AMFM5198B4PX7	https://www.amazon.com/Probiotic-6-Toothpaste-Whitening-Probiotics-Breath/dp/B0DB14NWBY
Dongli1688	https://www.amazon.com/sp?ie=UTF8&seller=A123OHRWLN3OBZ	https://www.amazon.com/Whitening-Toothpaste-Probiotics-Promotes-Brightening/dp/B0DB8DHYRM
FACECOI US	https://www.amazon.com/sp?ie=UTF8&seller=A1IAWQK1B7P2WG	https://www.amazon.com/dp/B0C5348LD7
Fangxiang Gu	https://www.amazon.com/sp?ie=UTF8&seller=AA977BY2LIMAU	https://www.amazon.com/Toothpaste-Probiotic-Fresh-Breath-Cleaning/dp/B0D9NBHS9W
FEILIAMA0	https://www.amazon.com/sp?ie=UTF8&seller=A3OLQO69TO8VU6	https://www.amazon.com/Toothpaste-Brightening-Removing-Whitener-Whitener/dp/B0C61Z664Y
fu668666skr	https://www.amazon.com/sp?ie=UTF8&seller=A2G7NVY5TTNFX6	https://www.amazon.com/Yayashi-S-Probiotics-Toothpaste-Breath-Removing/dp/B0CKZZCG1M
guilinshiwanyangmaoyi	https://www.amazon.com/sp?ie=UTF8&seller=AIBCG2EZ0ZTM	https://www.amazon.com/Toothpaste-Whitening-Probiotics-Toothpaste%EF%BC%8CSuper-Toothpaste%EF%BC%882Pcs%EF%BC%89/dp/B0DB2DVDPR

LAN'DO	https://www.amazon.com/sp?ie=UTF8&seller=ADCBKTSNKWCT9	https://www.amazon.com/Toothpaste-Whitening-Cleaning-1Pcs-120g-Correcting/dp/B0DJJKFPP
LOTOTICE	https://www.amazon.com/sp?ie=UTF8&seller=A2AYSWDIEY92U5	https://www.amazon.com/Probiotic-Toothpaste-Whitening-Probiotic-4-Brightening/dp/B0CBJW5YR2
LUSCO	https://www.amazon.com/sp?ie=UTF8&seller=AJJ97WVFTBK98	https://www.amazon.com/Probiotics-WhiteningToothpaste-Toothpaste-Removing-Correcting/dp/B0CBN7B92W
MingZheng	https://www.amazon.com/sp?ie=UTF8&seller=AW7WUMFAPG70I	https://www.amazon.com/Whitening-Toothpaste-Probiotic-4-4Toothpaste-2pcs-120g/dp/B0D1QLQ9H7
MusGui	https://www.amazon.com/sp?ie=UTF8&seller=A2E803DZ2KS4AN	https://www.amazon.com/Whitening-Toothpaste-probiotic-whitening-Breath/dp/B0DB13GQKT
Ruic	https://www.amazon.com/sp?ie=UTF8&seller=ATHVQYPIBGPYA	https://www.amazon.com/ProbioticSp-6-Toothpaste-Whitening-Cleaning-Brightening/dp/B0DGQHYJW1
sandakankeji	https://www.amazon.com/sp?ie=UTF8&seller=A1ARJGPZEN0LZI	https://www.amazon.com/Super-Probiotic-6-Toothpaste-Whitening-Breath/dp/B0DHXDC48K
Sanyear	https://www.amazon.com/sp?ie=UTF8&seller=A2IOXZTZZQJXSA	https://www.amazon.com/Whitening-Toothpaste-Cleaning-Probiotic-Brightening/dp/B0D83C8MZB
Scthr Oral Care	https://www.amazon.com/sp?ie=UTF8&seller=A2NT4LF28ES8QG	https://www.amazon.com/whitening-Toothpaste-brightening-probiotic-Removing/dp/B0DCZC8GKC
Senhaoguankeji	https://www.amazon.com/sp?ie=UTF8&seller=AR9HVKAQ05MEP	https://www.amazon.com/Probiotic-6-Toothpaste-Whitening-Cleaning-Breath120g/dp/B0D78FL9RB
ShangfeiA	https://www.amazon.com/sp?ie=UTF8&seller=A2XYDQWZY8F4UX	https://www.amazon.com/LANLV-Toothpaste-Probiotic-Whitening-Brightening/dp/B0CB8HQ9FY
TEGUANGBEI MEI	https://www.amazon.com/sp?ie=UTF8&seller=A3SAHDDRNL9TNZ	https://www.amazon.com/Yiliku-Toothpaste-Yayashi-Brightening-Breath/dp/B0C2VVQHT3

TuJin(7-14 Day Arrive)	https://www.amazon.com/sp?ie=UTF8&seller=A2KMRZI6KDJWEB	https://www.amazon.com/Probiotic-Stain-Removal-Whitening-Toothpaste/dp/B0CT32QKX8
WINDMO	https://www.amazon.com/sp?ie=UTF8&seller=A1KW52FC6KT515	https://www.amazon.com/Super-Probiotic-Toothpaste-Whitening-Breath/dp/B0DJKM2ZGW
Xijand (8-15) Days Delivery	https://www.amazon.com/sp?ie=UTF8&seller=A3F21RIR65A8GQ	https://www.amazon.com/Whitening-Toothpaste-Probiotics-Brightening-Probiotic/dp/B0DGY28TWM
Yingqiangkeji	https://www.amazon.com/sp?ie=UTF8&seller=A391DXC1PKTJ5C	https://www.amazon.com/Super-ProbioticSp-6-Toothpaste-Whitening-Breath/dp/B0D9J8LCKH
YOUSHEME	https://www.amazon.com/sp?ie=UTF8&seller=A7PDDCYKGT8YQ	https://www.amazon.com/Whitening-Toothpaste-Probiotic-Brightening-Cleaning/dp/B0D7YT8W5N
yuantt	https://www.amazon.com/sp?ie=UTF8&seller=AEZI11CMZWZ1J	https://www.amazon.com/YAYASHI-Toothpaste-Probiotics-Whitening-Removing/dp/B0CHJGLSYR
Zenbora	https://www.amazon.com/sp?ie=UTF8&seller=AK6K38RS0DMI2	https://www.amazon.com/Toothpaste-Probiotics-Whitening-Toothpastes-Cleansing/dp/B0DBG9SY1T
ZESEN SHOP	https://www.amazon.com/sp?ie=UTF8&seller=A2W1GYWGTIXFK1	https://www.amazon.com/Super-Probiotic-6-Toothpaste-Whitening-Breath/dp/B0D75SHF18
zhuotianshan	https://www.amazon.com/sp?ie=UTF8&seller=AAILGMDUEP0GE	https://www.amazon.com/Toothpaste-Yayashi-Probiotic-Whitening-YAYASHI/dp/B0CB5XVQTZ