

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

Dongguan Zhouda Technology Co. Ltd, et al.,

Plaintiff,

v.

Xinjie Dai,

Defendant.

CASE NO. 2:25-cv-00536-TL

**(proposed) Temporary Restraining
Order**

THIS CAUSE being before the Court on Plaintiffs Dengzhou Sandstorm Trading Co., Ltd. d/b/a Sandstorm2024, Dengzhou Muiyi Commerce Co. Ltd., d/b/a ZJT, Dengzhou Xingshan Trading Co., Ltd d/b/a DDDU (“Plaintiffs”) Ex Parte Motion for Entry of a Temporary Restraining Order (“Motion”) against the defendant Xinjie Dai (“Defendant”), and this Court having heard the evidence before it hereby GRANTS Plaintiff’s Motion in its entirety.

This Court further finds that it has personal jurisdiction over the Defendant because Defendant, in wrongfully enforcing its purported rights in the D1,056,616 (the “’616 Patent”) against Plaintiffs’ product through Amazon.com’s infringement reporting function, has ceased Plaintiffs’ lawful sales of its products through Washington and into the United States, has committed a tortious act in Washington, and caused injury to Plaintiffs including through the wrongful prevention of Plaintiffs’ continued sales and shipments of its product through into and through Washington and this Judicial District.

This Court also finds that issuing this Order without notice pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure is appropriate because Plaintiff has presented specific facts

1 in the Declaration of Yuan Cao, Declaration of Mengdi Zhao, and Declaration of Chenyang Ma
2 in support of Plaintiff's Motion for Temporary Restraining Order and accompanying evidence
3 clearly showing that immediate and irreparable injury, loss, or damage will result to the movant
4 before the adverse party can be heard in opposition. Specifically, Defendant's wrongful
5 enforcement of its purported rights in the '616 Patent have harmed Defendants' reputation and
6 advertising efforts, indefinitely lost Plaintiff customers, compromised Plaintiffs' Amazon account
7 ranking and reviews, exacerbated the risk of account termination as a repeat offender, and
8 corroded Plaintiff's commercial goodwill.

9 Accordingly, this Court orders that:

- 10 1. Plaintiffs' motion for temporary restraining order is granted;
- 11 2. Any online marketplace platforms including, without limitation, Amazon, eBay, Wish,
12 AliExpress, Joom, Vova, Temu, Walmart, (collectively, "Third-Party Platforms") that has
13 received a complaint that the '616 Patent is being infringed, including without limitation the
14 Complaint IDs 17456741711, 17422703331, 17473583681, on the Amazon.com platform, shall
15 retract, withdraw, or void the complaint and reinstate any products listings affected thereby.
16
- 17 3. Defendant, and its officers, directors, employees, agents, subsidiaries, attorneys, and all
18 persons in active concert or participation with Defendant, is hereby enjoined and restrained,
19 pending a final disposition of the case or until further Order of the Court, from issuing takedown
20 notices concerning the following Amazon Standard Identification Numbers ("ASINs") and
21 products therein, or otherwise notifying Amazon.com or other Third Party Platforms that
22 Defendant has patent rights being infringed by the following ASINs and products therein offered
23 for sale by Plaintiff and/or that Plaintiff's sales thereof violate any patent rights: B0DSFVTB59,
24 B0DSFSQ17X, B0DSFSMMT9, B0DSFV2GBQ, B0DSFSP7DJ, B0DSFRWP1T,
25
26

B0DSFS741X, B0DSFSJ1ZP, B0DSFRHWP8, B0DSFQ2YJL, B0DSFS5QMB, B0DSFTZM6V,
 B0DSFR2JLZ, B0DSFQ4HPJ, B0DSFR44S2, B0DSZXZH73, B0DSFTSZJS, B0DSFRPY6B,
 B0DSFR258J, B0DSFR4V8X, B0DSFRM3J6, B0DSFRCHM9, B0DSFS4D5M,
 B0DSFSW78G, B0DSFQ1BYX, B0DSFTWQC5, B0DSFRGDDL, B0DSFSMRHM, and
 B0DSFRWP82, B0DT17L2SD, B0DT151DK4, B0DT17229J, B0DT18B8WC, B0DT18XBV2,
 B0DT1B3MFX, B0DT18BMMP, B0DS25STRT, B0DT174CTJ, B0DT16MMGZ,
 B0DT18FF94, B0DSVWN96V, B0DSVTFXZ4, B0DS25BCDD, B0DSVWDFQ6,
 B0DS24KNPG, B0DS26SYYG, B0DSVSM2MV, B0DSVTXJ2B, B0DRFPDHRN,
 B0DJVK5PD4, B0DS289CXP, B0DRFM91MB, B0DS25M5ZR, B0DRFN72G5,
 B0DSVT9R6B, B0DJVL2ZDW, B0DJVK8J8K, B0DS25PB59, B0DJVKBCQY,
 B0DSVWCTX6, B0DSVTP6H9, B0DS24MX9N, B0DRFNCLMH, B0DSVW1TP6, and
 B0DJVHBBZF, B0DS1VC3CG, B0DS1TLXQT, B0DS1T9CHX, B0DS1VP1D4,
 B0DS1V2YXX, B0DS1TF7GS, B0DS1VB3KQ, B0DS1SPV3C, B0DS1TQZNS,
 B0DS1RQBV9, B0DS1SC62T, and B0DS1SZGDM.

4. In light of there being no restriction on any accounts belonging to Defendant, the Court exercises its discretion not to require a bond.

5. This Temporary Restraining Order without notice is entered at ____ pm on this ____ day of _____ 2025 and shall remain in effect until _____.

 District Judge Tana Lin