

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

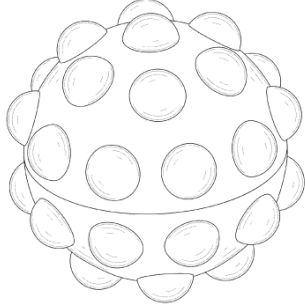
Shenzhen Kean Silicone Product Co., Ltd,)	
)	
Plaintiff,)	Case No. 25-cv-12135
)	
v.)	
)	Dist. Judge Jorge L. Alonso
Moon and Stars Online Inc. d/b/a , Moon)	
and Stars Online INC and)	Mag. Judge Jeffrey T. Gilbert
shenzhenshishenchenxingmaoyiyouxiangongsi)	
Defendant)	
d/b/a moringstars)	

TEMPORARY RESTRAINING ORDER

THIS CAUSE being before the Court on Plaintiff Shenzhen Kean Silicone Product Co., Ltd's ("Plaintiff") *Ex Parte* Motion for Entry of a Temporary Restraining Order including a temporary injunction, a temporary asset restraint and expedited discovery (the "Motion") against the fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A to the Complaint and Schedule A attached hereto (collectively, "Defendants") and using at least the alias names identified and the online marketplace accounts identified in Schedule A hereto (the "Defendant Online Stores"). After reviewing the Motions and the accompanying record, this Court GRANTS Plaintiff's Motion in its entirety.

This Court further finds that it has personal jurisdiction over the Defendants because Defendants directly target their business activities toward consumers in the United States, including Illinois. 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, and, on information and belief, have sold products that infringe directly or indirectly Plaintiff's United States design patent D975,787 shown in the below chart (the "Plaintiff Design").

¹ The e-commerce store URLs are listed on Schedule A hereto under the Online Marketplaces.

Patent Number	Claim	Issue Date
D975,787		January 17, 2023

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 in the Declaration of Yihong Zhou [Dkt. 5-1] in support of the Motion and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition. Specifically, in the absence of an *ex parte* Order, Defendants could and likely would move any assets from accounts in financial institutions under this Court's jurisdiction to off-shore accounts. As other courts have recognized, proceedings against those who deliberately traffic in infringing merchandise are often useless if notice is given to the adverse party. Accordingly, this Court orders that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, and all persons acting for, with, by, through, under, or in active concert with them be temporarily enjoined and restrained from:
 - a. offering for sale, selling, and importing any products not authorized by Plaintiff and that include any reproduction, copy or colorable imitation of the designs claimed in the Plaintiff Design;
 - b. aiding, abetting, contributing to, or otherwise assisting anyone in infringing upon the Plaintiff Design; and

including, without limitation, PayPal, Inc. (“PayPal”), Alipay, Wish, Alibaba, Ant Financial Services Group, Amazon Pay, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

3. Upon Plaintiff’s request, those with notice of this Order, including the Third-Party Providers as defined in paragraph 2, shall within ten (10) business days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of infringing goods using the Plaintiff Design.
4. Defendants shall be temporarily restrained and enjoined from transferring or disposing of any money or other of Defendants’ assets until further ordered by this Court.
5. Any entities with actual notice of this order, including any banks, credit card companies, or payment processing companies including Third-Party Providers, shall, within ten (10) business days of receipt of this Order:
 - a. locate all accounts and funds connected to the Defendant Online Stores, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, 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. Plaintiff is authorized to issue expedited written discovery, pursuant to the Federal Rules of Civil Procedure 33, 34 and 36, related 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; and

- 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, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces.

Plaintiff is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

- 7.** Plaintiff shall deposit with the Court \$10,000.00, either cash, law firm check, or surety bond, as security, which amount has been determined adequate for the payment of such damages as any person may be entitled to recover as a result of a wrongful restraint hereunder.
- 8.** Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and Northern District of Illinois Local Rules
- 9.** This Temporary Restraining Order without notice is entered at 8:00 A.M. on this 23rd day of October 2025 and shall remain in effect for fourteen (14) calendar days.

A handwritten signature in black ink, consisting of a large, stylized 'J' and 'A' followed by a period, enclosed within a large, loopy oval shape.

Hon. Jorge L. Alonso

Schedule A

Def	Store Name	Store URL	Seller ID	Listing	ASIN
1	MOON AND STARS INC	https://www.amazon.com/sp?ie=UTF8&seller=AFT0BPYNYQ1M1&asin=B09LYGXZHH&ref_=dp_merchant_link&isAmazonFulfilled=1	AFT0BPYNYQ1M1	https://www.amazon.com/Squishy-Fidgets-Stuffers-Poppers-Sensory/dp/B09LYGXZHH/ref=sr_1_3?dib=eyJ2IjoiMSJ9.TMPn98ACxadr1sGz3PICRI9j_Mxvi9z-n6-uhwfsUU9GhLH_qivU_1PXiK6DRHnJnhWApOIQyJ0nRnNRSx2Q57b7Q02Xw7PQwLvwDDx3uM9foPI2Fx1dnJU m7Eo3mo2spSZ2_SFUh4Up0HCi-wOZdlB3SptCwn3ZT0Ar4eqJnYoR1kHG7wGtnV1InurAU86AlhBOoM0D7DTTCCOVAQWDNsDN9muyGc0FScUvQQ18c.LvJ4eSKFijp2BVqC1BUne0po1l8aoiWp1SHvEJgQKq8&dib_tag=se&m=AFT0BPYNYQ1M1&marketplaceID=ATVPDKIKX0DER&qid=1758216955&s=merchant-items&sr=1-3&th=1	B09LYGXZHH
				https://www.amazon.com/Inflatable-Stuffers-Fidgets-Poppers-Keychain/dp/B0BQQNF43M/ref=sr_1_7?dib=eyJ2IjoiMSJ9.TMPn98ACxadr1sGz3PICRI9j_Mxvi9z-n6-uhwfsUU9GhLH_qivU_1PXiK6DRHnJnhWApOIQyJ0nRnNRSx2Q57b7Q02Xw7PQwLvwDDx3uM9foPI2Fx1dnJU m7Eo3mo2spSZ2_SFUh4Up0HCi-wOZdlB3SptCwn3ZT0Ar4eqJnYoR1kHG7wGtnV1InurAU86AlhBOoM0D7DTTCCOVAQWDNsDN9muyGc0FScUvQQ18c.LvJ4eSKFijp2BVqC1BUne0po1l8aoiWp1SHvEJgQKq8&dib_tag=se&m=AFT0BPYNYQ1M1&marketplaceID=ATVPDKIKX0DER&qid=1758216955&s=merchant-items&sr=1-7	B0BQQNF43M
				https://www.amazon.com/Inflatable-Squeeze-Fidgets-Sensory-Stuffers/dp/B0BPC4CZNX/ref=sr_1_8?dib=eyJ2IjoiMSJ9.TMPn98ACxadr1sGz3PICRI9j_Mxvi9z-n6-uhwfsUU9GhLH_qivU_1PXiK6DRHnJnhWApOIQyJ0nRnNRSx2Q57b7Q02Xw7PQwLvwDDx3uM9foPI2Fx1dnJU m7Eo3mo2spSZ2_SFUh4Up0HCi-wOZdlB3SptCwn3ZT0Ar4eqJnYoR1kHG7wGtnV1InurAU86AlhBOoM0D7DTTCCOVAQWDNsDN9muyGc0FScUvQQ18c.LvJ4eSKFijp2BVqC1BUne0po1l8aoiWp1SHvEJgQKq8&dib_tag=se&m=AFT0BPYNYQ1M1&marketplaceID=ATVPDKIKX0DER&qid=1758216955&s=merchant-items&sr=1-8	B0BPC4CZNX
2	Moringstars	https://www.amazon.com/sp?ie=UTF8&seller=A3OUYIW2LGBPB5&asin=B09NW1V6S9&ref_=dp_merchant_link&isAmazonFulfilled=1	A3OUYIW2LGBPB5	https://www.amazon.com/Fidget-Squeeze-Silicone-Sensory-Elderly/dp/B09NW1V6S9/ref=sr_1_8?dib=eyJ2IjoiMSJ9.EHRHvApkRZn6GJVpO5VKdik2To-Dz91R5AxyPQjFRo0W-XMu1sjxs7ddjTZRqf3pSKHY1w_tj4KYISPG8ni4cyKPVYmp_dzBKP9c6zuu25fikcMAVJgj4GKNwwiLMcfM_sKVXNFWBD3NOfq-bj29IUZch8DM_yfM4_kzyo3VmJt5lsYyMSW6HczFY2bSx2-X8HFLvFhFz2qfrD8gMghNQ0mBF85donSpECQ6YIM1AfcjG4KU4rg_txyE3evO8wEHBloppToW50bZaA3Hrd625Y&dib_tag=se&m=A3OUYIW2LGBPB5&marketplaceID=ATVPDKIKX0DER&qid=1758216968&s=merchant-items&sr=1-8&th=1	B09NW1V6S9