

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

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Union Imagination Tech. Co. Ltd.,	)	
	Plaintiff,	)
		) Case No. 1:25-cv-14990
v.		)
		) Dist. Judge Sharon Johnson Coleman
TengXianTaiPingXingHeBaiHuoShang		)
Hang d/b/a PASOLABE,		) Mag. Judge Daniel P. McLaughlin
	Defendant	)

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**Notice of Plaintiff's Motion for Entry of a Preliminary Injunction**

**PLEASE TAKE NOTICE** that on January 27, 2026 at 10:00am or as soon thereafter as I may be heard, I shall appear before the Honorable Judge Sharon Johnson Coleman in Room 1241 of the Everett McKinley Dirksen United States Courthouse 219 South Dearborn Street Chicago, IL 60604, or using video or teleconferencing technology as the Court may require, and shall present the Motion for Entry of a Preliminary Injunction [Dkt. 30].

Dated: January 22, 2026

Respectfully Submitted

/s/Adam E. Urbanczyk  
Adam E. Urbanczyk  
AU LLC  
444 W. Lake St. 17 Floor  
Chicago, IL 60606  
(312) 715-7312  
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*Counsel for Plaintiff*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
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Plaintiff,	)	
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**Plaintiff’s Motion for Entry of a Preliminary Injunction**

**NOW COMES** Union Imagination Tech. Co. Ltd. (“Plaintiff”), by and through its undersigned counsel, and submits this Motion for Entry of a Preliminary Injunction.

**I. Introduction**

Plaintiff Union Imagination Tech. Co. Ltd. (“Plaintiff”) has brought the present action against the defendant identified in the Schedule A of the Complaint (“Defendant”) under section 17 U.S.C. § 501 of the Copyright Act. As Plaintiff alleges in the Complaint, Defendant is selling products using pirated copies of Plaintiff’s copyrighted works (the “Plaintiff Works”) to sell Defendant’s own products through at least the fully interactive, e-commerce stores and online marketplaces identified within the Schedule A attached to the Complaint.

On January 13, 2026, this Court granted Plaintiff’s Ex Parte Motion for Entry of a Temporary Restraining Order (“TRO”) and Plaintiff’s Motion for Electronic Service of Process Pursuant to Fed. R. Civ. P. 4 (f)(3). [Dkts. 26, 27]. The Motion for Electronic Service of Process authorized Plaintiff to provide notice of these proceedings and the preliminary injunction hearing to Defendant 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., PayPal, eBay, and Amazon) that included a link to said website. [Dkt. 27]. Pursuant to the TRO and

since the TRO was entered, the Amazon account associated with the Defendant Online Store has been restrained. *See*, Declaration of Adam Urbanczyk, at ¶ 2. Plaintiff respectfully requests this Court to convert the TRO to a preliminary injunction against the Defendant so that the Defendant remains enjoined from reproducing, distributing, displaying, or otherwise exploiting without authorization the Plaintiff Works during the pendency of this litigation. As part of the preliminary injunction, Plaintiff requests that revenue Defendant earned from the sale of identified products sold through Defendant's infringing of the Plaintiff Works remain restrained until completion of these proceedings.

**II. 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 Defendant. Courts addressing similar allegations of e-commerce infringement have also issued preliminary injunctions following a temporary restraining order. *See, e.g.*, Deckers Outdoor Corp. v. The P'ships and Unincorporated Assocs. Identified on Schedule "A", No. 15-cv-3249 Dkt. 32 (N.D. Ill. May 6, 2015); Oakley, Inc. v. Does 1-100, No. 12-cv-9864 Dkt. 23 (N.D. Ill. Dec. 27, 2012); Mon Cheri Bridals, LLC v Does 1-464, No. 19-cv-02362 Dkt. 31 (N.D. Ill. May 21, 2019).

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

In the Seventh Circuit, the standard for granting a preliminary injunction is identical to the standard for entering a TRO, and in this case the requirements for entry of a preliminary injunction have been satisfied. *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). Generally, a party seeking to obtain a preliminary injunction or must demonstrate: (i) that such party's case has some likelihood of success on the merits; (ii) that no adequate remedy at law exists; and (iii) that such party will suffer irreparable harm

if the injunction is not granted. Ty, Inc. v. The Jones Group, Inc., 237 F.3d 891, 895 (7th Cir. 2001); Columbia Pictures Indus., Inc. v. Jasso, 927 F. Supp. 1075, 1076 (N.D. Ill. 1996); *see*, Coach, Inc. v. The P'ships & Unincorporated Assocs. Identified on Schedule "A", 2013 WL 5477573, at \*1 (N.D. Ill. Oct. 1, 2013) (granting preliminary injunction against foreign online resellers after entry of TRO). Because this Court has already entered the TRO, this Court has already found the requirements for entry of the preliminary injunction have been met.

*ii. The equitable relief sought, including asset restraint, remains appropriate.*

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 Defendant's infringing products be impounded and destroyed. (17 U.S.C. § 503).

Accordingly, Plaintiff requests conversion of the TRO into a preliminary injunction so that Defendant's infringing activities remain stymied and funds Defendant earned through its infringement of the Plaintiff Works remain restrained 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 was offering for sale and/or selling products by using unauthorized displays and reproductions of the Plaintiff Works. In the absence of a preliminary injunction, Defendant will be motivated to and may move assets from its U.S.-associated payment accounts, including eBay, PayPal, and Amazon accounts, to an offshore account or otherwise transferred beyond recovery. Therefore, Defendant's assets which are proceeds from its sale of goods through the infringement of the Plaintiff Works should remain restrained and frozen for the remainder of these proceedings, subject to further court order.

The Complaint describes damages to which Plaintiff is entitled, including Defendant's profits under 17 U.S.S. § 504(a) and actual damages under 17 U.S.C. § 504(b) exceeding any amount

contained in any of Defendant's restrained PayPal or Amazon accounts. Indeed, Amazon has identified Defendant has sold 21,073 units of the products at issue for a total of \$232,489.40. Urbanczyk Decl. ¶ 3. As such, an order continuing to freeze the Defendant's assets should be entered. *See, e.g., Banister v. Firestone*, 2018 WL 4224444 at \*9 (N.D. Ill. Sept. 5, 2018) (acknowledging Court's authority to freeze assets where plaintiff sought equitable remedies under section 17 U.S.C. § 504(b) of the Copyright 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."); *Deckers Outdoor Corp. v. P'ships & Unincorporated Assocs. Identified on Schedule A*, 2013 WL 12314399 (N.D. Ill. Oct. 31, 2013) ("[T]here is an exception to the general ban on prejudgment asset restraint where an equitable remedy is sought."); *Monster Energy Co. v. Wensheng*, 136 F. Supp. 3d 897, 910 (N.D. Ill. 2015) (denying motion to dissolve preliminary injunction in light of Lanham Act and Copyright Act claims and maintaining injunction bond at \$10,000).

### **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 against the Defendant under the terms which were employed in the TRO and substantially in the form provided herewith. *Coach*, 2013 WL 5477573, at \*4.

Dated: January 22, 2026

Respectfully Submitted

/s/Adam E. Urbanczyk  
Adam E. Urbanczyk  
AU LLC  
444 W. Lake St., 17 Floor  
Chicago, IL 60606  
(312) 715-7312

adamu@au-llc.com  
*Counsel for Plaintiff*

**Certificate of Service**

I hereby certify that on the January 22, 2026, I will electronically file the foregoing with the Clerk of the Court using the CM/ECF system, I will electronically publish the documents on a website, and I will send an e-mail to the e-mail addresses provided for Defendant by third parties that includes a link to said website.

/s/Adam E. Urbanczyk  
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Defendant	)	

**Declaration of Adam Urbanczyk**

I, Adam 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 the Courts of the States of Illinois and Michigan and the District of Columbia, and the United States District Court for the Northern District of Illinois, et al. I am an attorney for Plaintiff Union Imagination Tech. Co. Ltd. (“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. 26] and since the temporary restraining order’s entry, the Amazon payment account associated with the Defendant Online Store has been restrained and frozen.
3. Per expedited discovery provided by Amazon, Defendant sold 21,073 units of the products identified in Schedule A (by ASIN) to the First Amended Complaint for a total of \$232,489.40.

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

Executed this January 22, 2026

/s/Adam E. Urbanczyk  
 Adam E. Urbanczyk  
 AU LLC  
 444 W. Lake St., 17 Floor  
 Chicago, IL 60606

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