

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

Light in the Box Limited,	)	
Plaintiff,	)	
v.	)	Case No. 1:26-cv-08286
The Partnerships and Unincorporated	)	Dist. Judge Elaine E. Bucklo
Associations Identified on Schedule A,	)	Meg. Judge Albert Berry, III
Defendants	)	

Plaintiff's Motion for Leave to File Under Seal

NOW COMES Light in the Box Limited (“Plaintiff”), by and through its undersigned counsel, and hereby requests leave to file and temporarily maintain the following documents under seal: (i) Schedule A attached to the Complaint, which lists the fully interactive, e-commerce stores operating under the seller aliases (the “Defendant Online Stores”) and the corresponding e-commerce stores and accused product URLs [Dkt. 3-2]; (ii) Exhibit 1 of the Complaint which identifies Plaintiff and his Plaintiff Works [Dkt. 3-1]; (iii) the Declaration of Hua Yin and exhibits attached thereto, which include screenshot printouts showing the Defendant Online Stores offering to ship and shipping infringing products into this judicial district [Dkt. 4]; the Declaration of Adam E. Urbanczyk which includes demonstrations of the Defendants’ unknown locations [Dkt. 5]; and (v) the temporary restraining order. In this action, Plaintiff is requesting temporary *ex parte* relief based on an action for copyright infringement. Sealing these portions of the file is necessary, at the very outset of the case, to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings - including the identity of the Plaintiff Works prematurely, such as from sellerdefense.cn or other court monitoring services - the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court’s power to grant relief. Once the temporary restraining

order has been served on the relevant parties and the requested actions are taken by third-parties (e.g., Temu.com), Plaintiff will move to unseal these documents.

Dated: July 15, 2026

Respectfully submitted,

/s/Adam E. Urbanczyk

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