

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

Yourstore Limited,	)	
	)	
Plaintiff,	)	Case No. 1:26-cv-08381
	)	
v.	)	
	)	Dist. Judge Jorge L. Alonso
The Partnerships and Unincorporated	)	
Associations Identified on Schedule A,	)	Mag. Judge Heather K. McShain
Defendants	)	

Motion to Extend the Temporary Restraining Order

Plaintiff Yourstore Limited, pursuant to Fed. R. Civ. P. 65(b)(2), seeks to extend the Temporary Restraining Order (“the “TRO”) granted and entered by the Court on July 22, 2026 [Dkt. 11] by a period of fourteen (14) days until August 19, 2026.

This Court entered the TRO on July 22, 2026 against the Defendants identified in Schedule A to the Complaint. [Dkt. 11]. The TRO, which was sealed, was only recently provided to Plaintiff. Plaintiff has provided the TRO to third party Temu *See*, Declaration of Adam E. Urbanczyk at ¶ 2. As of August 5, 2026, Temu has not completed effectuating the TRO, including restraining financial accounts, but is working to comply therewith. *Id.*, at ¶ 3. The TRO, currently, will expire on August 5, 2026.

Federal rules provide that a TRO entered without notice may be extended upon a showing, prior to expiration of the TRO, of good cause for such an extension. Fed. R. Civ. P. 62(b)(2). Plaintiff respectfully submits that such good cause exists to extend the TRO as a result of the high probability that the Defendants will continue to harm Plaintiff without the TRO being in place including, without limitation, relocating funds into inaccessible off-shore financial and bank accounts. As discussed in Plaintiff’s Motion Entry of the TRO [Dkt. 6], and as this Court found, this possibility of harm is significant. In light of the foregoing, Plaintiff respectfully requests that the

TRO be extended for a period of fourteen (14) days until August 19, 2026.

Dated this August 5, 2026

Respectfully submitted,

/s/Adam E. Urbanczyk

Adam E. Urbanczyk

AU LLC

444 W. Lake St. 17th Floor

Chicago, IL 60606

adamu@au-llc.com

Ph: (312) 715-7312

Attorney for Plaintiff

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

Yourstore Limited,	)	
	)	
Plaintiff,	)	Case No. 1:26-cv-08381
	)	
v.	)	
	)	Dist. Judge Jorge L. Alonso
The Partnerships and Unincorporated	)	
Associations Identified on Schedule A,	)	Mag. Judge Heather K. McShain
Defendants	)	

Declaration of Adam E. Urbanczyk

I, Adam E. Urbanczyk, of 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 State of Illinois and the United States District Court for the Northern District of Illinois. I am the attorney for Yourstore Limited (“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. We received a copy of the sealed TRO [Dkt. 11] on August 5, 2026, after various requests, including a phone call to chambers. **Exhibit 1.** Since receiving the TRO today, we have been working on ensuring third-party compliance, e.g., Temu, with the TRO’s terms by interfacing with Temu’s representatives.
3. As of the filing of Plaintiff’s Motion to Extend the Temporary Restraining Order, Temu has not yet completed effectuating the TRO, but on information and belief is working diligently to comply therewith including by, without limitation. Plaintiff expects to have expedited discovery from Temu within 10 days.

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

Executed this August 5, 2026 at Sarasota, Florida.

Respectfully submitted,

/s/Adam E. Urbanczyk

Adam E. Urbanczyk

AU LLC

444 W. Lake St. 17th Floor

Chicago, IL 60606

adamu@au-llc.com

Ph: (312) 373-0553

Attorney for Plaintiff

Exhibit 1



Adam Urbanczyk <adamu@au-llc.com>

Yourstore Limited - 26-cv-08381, copy of sealed TRO [Dkt. 11]

Lesley Fairley <Lesley_Fairley@ilnd.uscourts.gov>
To: "Adam E. Urbanczyk" <adamu@au-llc.com>
Cc: TM Enforcement <enforcement@au-llc.com>

Wed, Aug 5, 2026 at 2:54 PM

Lesley Fairley
Courtroom Deputy to the Honorable Jorge L. Alonso
US District Court for the Northern District of Illinois
219 S. Dearborn Street, Room 1908
Chicago, IL 60604
312-435-5849

Your opinion is important to us. Please take our customer service survey.

[Click here to take our Customer Service Survey](#)

From: Adam E. Urbanczyk <adamu@au-llc.com>
Sent: Wednesday, August 5, 2026 2:39 PM
To: Lesley Fairley <Lesley_Fairley@ilnd.uscourts.gov>
Cc: TM Enforcement <enforcement@au-llc.com>
Subject: Re: Yourstore Limited - 26-cv-08381, copy of sealed TRO [Dkt. 11]

CAUTION - EXTERNAL:

Ms. Fairley,

Can you please share a copy of the sealed TRO? It appears to have been entered on July 22nd, which would mean today is its expiration. We will need to move to extend it.

--



Adam E. Urbanczyk
Principal Attorney
AU LLC 444 W. Lake. St. 17th Floor Chicago, IL 60606
(312) 715-7312 | au-llc.com | sellerlitigation.com

This email may contain privileged and/or confidential information which would be for the sole use of the intended recipients. If you believe you have received this email in error, please notify us immediately and delete the email from your system.

On Thu, Jul 30, 2026 at 10:31 AM Adam E. Urbanczyk <adamu@au-llc.com> wrote:

Ms. Fairley,

Bumping this - can you please share a copy of the TRO?

--



Adam E. Urbanczyk

Principal Attorney

AU LLC 444 W. Lake. St. 17th Floor Chicago, IL 60606

(312) 715-7312 | au-llc.com | sellerlitigation.com

This email may contain privileged and/or confidential information which would be for the sole use of the intended recipients. If you believe you have received this email in error, please notify us immediately and delete the email from your system.

On Thu, Jul 23, 2026 at 8:19 AM Adam E. Urbanczyk <adamu@au-llc.com> wrote:

Ms. Fairley,

I see that the Court granted Plaintiff's TRO motion yesterday, but I do not see that we received a copy of that sealed order [Dkt. 11]. Can you provide that?
Thank you.

--



Adam E. Urbanczyk

Principal Attorney

AU LLC 444 W. Lake. St. 17th Floor Chicago, IL 60606

(312) 715-7312 | au-llc.com | sellerlitigation.com

This email may contain privileged and/or confidential information which would be for the sole use of the intended recipients. If you believe you have received this email in error, please notify us immediately and delete the email from your system.

CAUTION - EXTERNAL EMAIL: This email originated outside the Judiciary. Exercise caution when opening attachments or clicking on links.

document (1).pdf
161K