IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

LOGARO LLC,	*	
	*	
Plaintiff,	*	
	*	
v.	*	1:26-CV-03343-ELR
	*	
ABBRACCIA, et al.,	*	
	*	
Defendants.	*	
	*	

ORDER

This matter is before the Court on a *sua sponte* consideration of the propriety of joinder in this case. See Fed. R. Civ. P. 21 ("On motion *or on its own*, the court may at any time, on just terms, add or drop a party." (emphasis added)).

I. Background

The following facts are derived from Plaintiff Logaro LLC's Complaint. Plaintiff sells ink pad products in international e-commerce under the Crystal3 brand. Compl. ¶¶ 5, 6. Plaintiff registered its Crystal3 trademark in the United States, which remains in full force and effect. Id. ¶¶ 7–9. Defendants are 26 "individuals and business entities of unknown makeup who own and/or operate" e-commerce stores selling products "using infringing and/or counterfeit versions" of Plaintiff's Crystal3 trademark. Id. ¶¶ 1, 14. Because of these operations, Plaintiff contends that

Defendants are violating Plaintiff's intellectual property rights in the Crystal3 brand. Id. ¶¶ 37–51.

Plaintiff joined all 26 Defendants in the same action because they all "share characteristics establishing a logical relationship between them," and their activities "arise out of the same transaction, occurrence, or series of transactions or occurrences." Compl. ¶ 1. According to Plaintiff, because Defendants "conceal their identities and the full scope of their operation[,]" it is "virtually impossible for Plaintiff to discover Defendants' true identities and the exact interworking of their network." Id. ¶ 15. Nevertheless, Plaintiff alleges that "Defendants concurrently employ and benefit from substantially similar advertising and marketing strategies." Id. ¶ 27. Additionally, Plaintiff suggests that, because Defendants' e-commerce stores "often share unique characteristics" and their products "bear similar irregularities and indicia of being counterfeit," Defendants obtain their infringing products "from a common source and . . . are interrelated." Id.¶ 32.

On June 15, 2026, Plaintiff filed a single Complaint against all 26 Defendants, asserting claims of trademark infringement and counterfeiting in violation of 15 U.S.C. § 1114 and false designation of origin in violation of § 1125(a). Compl. ¶¶ 37–51. Contemporaneously, Plaintiff filed an *ex parte* Motion for Temporary Restraining Order seeking to prohibit Defendants from continuing their infringement of Plaintiff's trademark. [Doc. 3]. On June 16, 2026, the Court notified Plaintiff that it would *sua sponte* consider the propriety of joinder in this case and allowed Plaintiff to, within 14 days, explain how joinder of all 26 Defendants "satisfie[d] Federal Rule of Civil Procedure 20 or any other relevant joinder rule[,]" [Doc. 9], to which Plaintiff responded in support of joinder, [Doc. 11-1].[1]

II. Legal Standard

Federal Rule of Civil Procedure 20(a) allows defendants to be joined in a single action if "(A) any right to relief is asserted against them jointly, severally, or in the alternative with respect to or arising out of the same transaction, occurrence, or series of transactions or occurrences; and (B) any question of law or fact common to all defendants will arise in the action." When determining whether claims meet the first prong of Rule 20(a), courts look to the "logical relationship" between the claims asserted against the defendants. See Alexander v. Fulton Cnty., 207 F.3d 1303, 1323 (11th Cir. 2000), overruled on other grounds by Manders v. Lee, 338 F.3d 1304 (11th Cir. 2003). A "logical relationship" exists when "the same operative facts serve as the basis of both claims or the aggregate core of facts upon which the claim rests activates additional legal rights, otherwise dormant, in the defendant." Republic Health Corp. v. Lifemark Hosps. of Fla., Inc., 755 F.2d 1453, 1455 (11th Cir. 1985).

[1] Plaintiff represented that it did not receive the June 16 Order until after the expiration of the 14-day period and thus moved to extend the time to respond to the Order, [Doc. 11], which the Court granted, [Doc. 12].

Furthermore, Rule 21 authorizes district courts to, "[o]n motion or on its own, . . . on just terms, add or drop a party." While "[j]oinder is strongly encouraged" and ought to be "construed generously toward entertaining the broadest possible scope of action consistent with fairness to the parties," Vanover v. NCO Fin. Servs., Inc., 857 F.3d 833, 839 (11th Cir. 2017) (cleaned up), courts enjoy "broad discretion to join parties or not," Swan v. Ray, 293 F.3d 1252, 1253 (11th Cir. 2002). See Alhassid v. Bank of Am., N.A., 60 F. Supp. 3d. 1302, 1326 (S.D. Fla. 2014) ("In the Rule 21 context, the court has broad discretion to sever parties based on misjoinder."). To determine whether severance of claims or parties is proper, courts may "consider factors such as judicial economy, case management, prejudice to parties, and fundamental fairness." Malibu Media, LLC v. Does 1–28, 295 F.R.D. 527, 533 (M.D. Fla. 2012).

III. Discussion

The Court begins by addressing whether joinder satisfies Rule 20(a) and, concluding that it does not, then addresses whether severance under Rule 21 is warranted here to remedy the misjoinder.

A. Joinder under Rule 20(a)

In its response to the June 16 Order, Plaintiff argues that it satisfies the first prong of the Rule 20(a) inquiry for two reasons.[2] First, Plaintiff contends that joinder of Defendants satisfies the logical relationship test because the Complaint sufficiently alleges that Defendants' actions are similar enough to plausibly infer that Defendants "either are operated by the same entity, obtaining products from the same common source (supplier), or are working in active concert to employ a homogeneous strategy to collectively cause harm to Plaintiff's intellectual property rights." [Doc. 11-1 at 8]. Second, according to Plaintiff, its allegations demonstrate that the aggregate infringing activity of Defendants creates a "single collective harm" sufficient to "create a logical relationship establishing proper joinder." [Id. at 9].

Neither argument is availing. Plaintiff's first argument—that Defendants share a logical relationship with each other based on the similarity of their conduct—has already been rejected by several courts in this Circuit. E.g., Omega, SA v. Individuals, Bus. Entities, & Unincorporated Assocs. Identified on Schedule "A", 650 F. Supp. 3d 1349, 1352 (S.D. Fla. 2023); Price v. Individuals, P'ships, & Unincorporated Assocs. Identified on Schedule A., 821 F. Supp. 3d 1315, 1334

[2] Because Defendants do not satisfy the first prong of Rule 20(a), the Court need not reach the second prong of the joinder inquiry.

(M.D. Fla. 2026); Order at 7–9, Capyfun LLC v. quanyaocheng US, No. 26-CV-00420 (N.D. Ga. Apr. 15, 2026), ECF No. 12; see also Omega, SA, 650 F. Supp. at 1352 (collecting out-of-circuit cases). The undersigned agrees with those courts. Indeed, because Defendants do not act in concert in their infringement and are unaffiliated with one another, they cannot satisfy the "logical relationship" test because "there is no evidentiary overlap in proving liability for the alleged infringement." Id. (cleaned up); see also In re EMC Corp., 677 F.3d 1351, 1359 (Fed. Cir. 2012) (finding improper joinder under Rule 20 based on "the sameness of the accused products or processes" being infringed by defendants in patent context). In other words, "simply committing the same type of violation in the same way does not link defendants together for the purposes of joinder." AF Holdings, LLC v. Does 1–1058, 752 F.3d 990, 998 (D.C. Cir. 2014) (cleaned up). And while Plaintiff invites the Court to infer from this similarity in conduct that Defendants are either "operated by the same entity" or "are working in active concert" to infringe Plaintiff's trademark, [Doc. 11-1 at 8], this Court joins others in declining the invitation to do so based solely on conclusory allegations. See Kay v. Individuals, P'ships, & Unincorporated, No. 23-CV-22755, 2023 WL 6809762, at *2 (S.D. Fla. Oct. 16, 2023) (rejecting assertion that defendants are "likely the same individual or entity" as conclusory based only on the "same systemic approach" of their infringement); Price, 821 F. Supp. 3d at 1334 (refusing to find a logical relationship between defendants based on allegations of similarity in infringement when products were unsophisticated and easy to make).

Plaintiff's second argument—that Defendants' aggregated activity creates a single collective harm justifying joinder—fares no better. The fact that Defendants may have benefitted from their co-Defendants' infringement acting as a "swarm" against Plaintiff remains insufficient to establish a logical relationship between them. See Order at 6–7, Capyfun LLC, No. 26-CV-00420. In other words, simply because the harm suffered by Plaintiff on account of all Defendants' actions is similar "suggest[s] nothing more than separate instances of infringement attributable to different defendants, not events arising out of the same transaction or occurrence." Roadget Bus. Pte. Ltd. v. Individuals, Corps., LLCs, P'ships & Unincorporated Assocs. Identified on Schedule A Hereto, 735 F. Supp. 3d 981, 985 (N.D. Ill. 2024).

Accordingly, Plaintiff has not demonstrated that Defendants satisfy the first prong of the Rule 20(a) inquiry and thus their joinder is not appropriate.

B. Severance under Rule 21

Having found that Defendants are not properly joined here, the Court turns to the question of whether to sever Defendants under Rule 21. Plaintiff contends that "practical considerations" weigh in favor of maintaining Defendants in this action for several reasons, including the early stage of the case, lack of prejudice to Defendants, and judicial economy. [Doc. 11-1 at 17–22].

While severance of Defendants may not prejudice Defendants, judicial economy is better served by Plaintiff proceeding against Defendants separately. Indeed, "presenting dozens or hundreds of defendants in one lawsuit actually undermines judicial economy, because this Court must evaluate the evidence submitted in support of liability and, eventually, damages." Estée Lauder Cosmetics Ltd. v. P'ships & Unincorporated Assocs. Identified on Schedule A, 334 F.R.D. 182, 189 (N.D. Ill. 2020); see Malibu Media, LLC, 295 F.R.D. at 534 ("[T]he only economy that litigating these cases as a single action would achieve is an economy to plaintiff—the economy of not having to pay a separate filing fee for each action brought." (cleaned up)). Additionally, cases like this with dozens of defendants place a tremendous administrative burden on the Clerk of Court for the Northern District of Georgia, further hindering judicial economy and the Court's ability to efficiently manage its caseload. Docket clerks must dedicate significant time to such cases by, for instance, filing or issuing summonses for dozens of defendants, in addition to their normal administrative tasks in one of the busiest district courts in the country.[3] Therefore, severance of Defendants is appropriate here.

[3] See Admin. Off. of U.S. Cts., Federal Caseload Statistics, Table C-1—U.S. District Courts—Civil Statistical Tables For The Federal Judiciary (December 31, 2025), https://www.uscourts.gov/data-news/data-tables/2025/12/31/statistical-tables-federal-judiciary/c-1 (listing the Northern District of Georgia as having the 10th most cases filed among district courts around the country in 2025).

IV. Conclusion

Accordingly, the Court **ORDERS** Plaintiff to, within **14 DAYS**, file a notice selecting one or more Defendants against whom it wishes to proceed in this action. If selecting multiple Defendants, Plaintiff must specify how those Defendants are sufficiently related such that joinder is appropriate in light of this order. If Plaintiff does not file a notice, the Court **DIRECTS** the Clerk to resubmit this action to the undersigned, who will select the first named Defendant in the Complaint.

SO ORDERED, this 17th day of July, 2026.

Eleanor L. Ross

Eleanor L. Ross
United States District Judge
Northern District of Georgia

Other Orders/Judgments

1:26-cv-03343-ELR *SEALED*
Logaro LLC et al v. Abbraccia et al

4months,ELRLC3,SUBMDJ

U.S. District Court

Northern District of Georgia

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Case Name: Logaro LLC et al v. Abbraccia et al
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1:26-cv-03343-ELR *SEALED* No electronic public notice will be sent because the case/entry is sealed.

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