

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF INDIANA  
HAMMOND DIVISION**

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|----------------------------------------|---|----------------------------|
| Cheung Ching Tsoi,                     | ) |                            |
|                                        | ) |                            |
| Plaintiff,                             | ) |                            |
|                                        | ) | Case No. 2:26-cv-00357-JEM |
| v.                                     | ) |                            |
|                                        | ) | Mag. Judge John E Martin   |
| The Partnerships and Unincorporated    | ) |                            |
| Associations Identified on Schedule A, | ) |                            |
| Defendants                             | ) |                            |

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**Plaintiff's Motion for Leave to File Under Seal**

**NOW COMES** Cheung Ching Tsoi ("Plaintiff"), by and through its undersigned counsel, and hereby requests leave to file and temporarily maintain the following documents under seal: (i) Exhibits 1-3 and Schedule A to the Complaint [Dkt. 2]; (ii) Declaration of Cheung Ching Tsoi [Dkt. 6]; (iii) Declaration of Adam E. Urbanczyk [Dkt. 7]; and (iv) 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., Amazon.com), Plaintiff will move to unseal these documents.

Dated: August 12, 2026

Respectfully submitted,

/s/Adam E. Urbanczyk

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*Counsel for Plaintiff*