

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF INDIANA
HAMMOND DIVISION

CHEUNG CHING TSOI,

Plaintiff,

v.

THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE A,

Defendant.

Case No. 2:26-CV-357-GSL-JEM

SEALED TEMPORARY RESTRAINING ORDER

THIS CAUSE being before the Court on Cheung Ching Tsoi (“Plaintiff”) *Ex Parte* Motion for Entry of a Temporary Restraining Order, Including a Temporary Injunction, a Temporary Asset Restraint, and Expedited Discovery [DE 5] (the “Motion”) against the defendants identified in Schedule A to the Complaint and attached hereto (the “Defendants”) and using at least the online marketplace accounts identified in Schedule A (the “Defendant Online Stores”), and this Court having heard the evidence before it hereby GRANTS Plaintiff’s Motion.

This Court finds that Plaintiff is the exclusive owner of all right, title, and interest in and to the United States Copyright Registration No. VA 2-502-292 (the “Plaintiff Copyright”), which protects the visual art that Plaintiff uses to advertise its products (collectively, the “Plaintiff Works”).

This Court further finds that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Indiana. Specifically, Defendants are reaching out to do business with Indiana residents by operating one or more commercial, interactive Defendant Online Stores through

products which are sold through the unauthorized reproduction, display, and exploitation of the Plaintiff Works, and are offered to be sold and have been sold into Indiana.

This Court also finds that issuing this Order without notice pursuant to Rule 65(b)(1) of the Federal Rules of Civil Procedure is appropriate because Plaintiff has presented specific facts in the Declaration of Cheung Ching Tsoi [DE 6] and the Declaration of Adam E. Urbanczyk [DE 7] in support of Plaintiff's Motion for Temporary Restraining Order [DE 5], and accompanying evidence clearly showing that immediate and irreparable injury, loss, or damage will result to the movant before the adverse party can be heard in opposition.

Specifically, in the absence of an *ex parte* Order, Defendants could and likely would modify registration data and content and move any assets from accounts in U.S.-based financial institutions, including without limitation Amazon Pay, to offshore accounts. *Id.* Proceedings against those who deliberately traffic in counterfeit merchandise are often useless if notice is given to the adverse party.

ACCORDINGLY, this Court ORDERS that:

1. Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under, or in active concert with them be temporarily enjoined and restrained from:
 - a. reproducing, distributing copies of, making derivative works of, or publicly displaying the Plaintiff Works in any manner without the express authorization of Plaintiff;
 - b. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff; and

- c. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiff, nor authorized by Plaintiff to be sold or offered for sale, and which bear any of Plaintiff's copyrights, including the Plaintiff Copyrights, or any reproductions, counterfeit copies, or colorable imitations.
- 2. Defendants and any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of the Defendant Online Stores or other online marketplace accounts operated by Defendants, including, without limitation, any online marketplace platforms such as Amazon, Temu, eBay, web hosts, sponsored search engine or ad-word providers, credit cards, banks, merchant account providers, third party processors and other payment processing service providers such as PayPal, AliPay, Payoneer, Skrill, Ping Pong, and Temu Payments, and Internet search engines such as Google, Bing and Yahoo (collectively, the "Third-Party Providers") shall, within five (5) business days after receipt of such notice, provide to Plaintiff expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:
 - a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, including any and all associated e-mail addresses;
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Defendant Online Stores and Defendants' financial

accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Defendant Online Stores;

- c. any of the Defendant Online Stores;
- d. any other online marketplace accounts registered by Defendants; and
- e. any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, PayPal, AliPay, Payoneer, Skrill, Ping Pong, and Amazon Payments, or other merchant account providers, payment providers, third party processors, and credit card associations (*e.g.*, MasterCard and VISA).

3. Upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including the Third-Party Providers as described in Paragraph 2, shall within five (5) business days after receipt of such notice:

- a. disable and cease providing services being used by Defendants, currently or in the future, to engage in the sale of goods using the Plaintiff Works;
- b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the Plaintiff Works; and
- c. take all steps necessary to prevent links to the Defendant Online Stores identified on **Schedule A** from displaying in search results, including, but not limited to, removing links to the Defendant Online Stores from any search index.

4. Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money earned by Defendants from its sales of any of the Items identified in Schedule A (collectively, the “Accused Revenue”) until further ordered by this Court.
5. PayPal, Amazon Pay, and any banks, savings and loan associations, payment processors, or other financial institutions, including any Third-Party Providers, shall, within seven (7) calendar days of receipt of this Order, for any Defendant or any of the Defendant Online Stores:
 - a. locate all accounts and funds connected to Defendants or the Defendant Online Stores, including, but not limited to, any eBay, PayPal, and Amazon Pay accounts connected to the Defendant Online Stores identified in Schedule A hereto and any e-mail addresses provided for Defendants by third parties; and
 - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants’ assets, up to the amount of Accused Revenue, until further ordered by this Court.
6. Exhibits 1-3 and Schedule A to the Complaint [DE 2], Declaration of Cheung Ching Tsoi [DE 6], Declaration of Adam E. Urbanczyk [DE 7], and this Order shall remain sealed until further ordered by this Court.
7. Plaintiff shall deposit with the Court ten thousand dollars (\$10,000.00), either cash, law firm check, or surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of a wrongful restraint hereunder.

8. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and the Northern District of Indiana Local Rules. Any third party impacted by this Order may move for appropriate relief.
9. This Temporary Restraining Order without notice is entered on this 26th day of August 2026 and shall remain in effect for fourteen (14) days.

/s/ GRETCHEN S. LUND

Judge

United States District Court

Schedule A

Store Name	Store URL	Listing URL	ASIN/Item ID
AUUGUU	https://www.amazon.com/sp?ie=UTF8&seller=A2WQA02QSPEEJL	https://www.amazon.com/dp/B07R414WTV?t=1	B07R414WTV
Beikeweier Toys	https://www.amazon.com/sp?ie=UTF8&seller=A2G24WX67F61SP	https://www.amazon.com/dp/B0F83Z1FFH?th=1	B0F83Z1FFH
Distorerun	https://www.amazon.com/sp?ie=UTF8&seller=A3T5XXY1UM8XJP	https://www.amazon.com/dp/B0CRV4ZWD9	B0CRV4ZWD9
FIVEDAOGANG Toys	https://www.amazon.com/sp?ie=UTF8&seller=A13WVTMYWZFFM2	https://www.amazon.com/Magnetic-Floating-Colorful-Portable-XX-Large/dp/B08SW76LB	B08SW76LB
jiayangshirunchuangshangmaoyouxiangongsi	https://www.amazon.com/sp?ie=UTF8&seller=A1C50FKKAC20WC	https://www.amazon.com/dp/B0D1QXRMXP	B0D1QXRMXP
KukuFun Direct	https://www.amazon.com/sp?ie=UTF8&seller=A33TQCFW3ZIAU6	https://www.amazon.com/dp/B0CY5FL9DZ?th=1	B0CY5FL9DZ
Mengxiangjia Toy	https://www.amazon.com/sp?ie=UTF8&seller=A1SE4ND495XZR2	https://www.amazon.com/dp/B0DD3KKQ6Q?t=1	B0DD3KKQ6Q
Nagelintoys	https://www.amazon.com/sp?ie=UTF8&seller=AMWWX8V4QLDK1	https://www.amazon.com/Magnetic-Fishing-Toddlers-Bathtub-Outdoor/dp/B0GDDKHNV	B0GDDKHNV
QinHuitoys	https://www.amazon.com/sp?ie=UTF8&seller=A2KUVNVCEME83B	https://www.amazon.com/dp/B0F3X7QRDC?t=1	B0F3X7QRDC
SuxingToys	https://www.amazon.com/sp?ie=UTF8&seller=A38S4BQ691HVAQ	https://www.amazon.com/dp/B0DLK7V57M?t=1	B0DLK7V57M
Temitoys	https://www.amazon.com/sp?ie=UTF8&seller=A298XY3U6S0N1Y	https://www.amazon.com/dp/B0D5H5V4TD?t=1	B0D5H5V4TD
VANHANZE	https://www.amazon.com/sp?ie=UTF8&seller=A2I6HWLDB1EIOW	https://www.amazon.com/dp/B0FLXFH8NV	B0FLXFH8NV
Rirol Studio	https://www.walmart.com/seller/101199324	https://www.walmart.com/ip/Kids-Fishing-Bath-Toy-Set-Magnetic-Rod-Net-Floating-Fish-Educational-Ocean-	416931547

		Animals-Learning-Toy-for-Toddler/416931547	
VANNYVANYA	https://www.walmart.com/seller/102800789	https://www.walmart.com/ip/Pool-Fishing-Bath-Toys-Water-Table-Bathtub-Toy-with-Inflatable-Pool-Pole-Rod-Net-Plastic-Floating-Fish-Kids-Outdoor-Toys-Birthday-Gifts-for-Kids/17451965888	17451965888
YIJIAL	https://www.walmart.com/seller/101672861	https://www.walmart.com/ip/YIJIAL-44-PCS-Magnetic-Fishing-Toys-Game-Set-for-Kids-Water-Table-Bathtub-Toy-with-Pole-Rod-Net-Plastic-Floating-Fish-for-3-4-5-6-Year-Old/5672012792	5672012792