

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

Logaro LLC,

Plaintiff,

v.

%liZCVDEii0, et al.,

Defendants.

Case No. 1:26-cv-03276-ELR

**Plaintiff's Motion to Extend Temporary Restraining Order and
Continue Hearing**

NOW COMES Logaro LLC ("Plaintiff"), by and through its undersigned counsel, and 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 August 19, 2026 [Dkt. 10] by a period of fourteen (14) days until September 16, 2026.

The Court entered the TRO on August 19, 2026 against the Defendants identified in the Amended Complaint. [Dkt. 16]. Since the TRO was entered, Plaintiff has been diligently working with third party Amazon.com to ensure its compliance with the TRO. *See*, Declaration of Adam E. Urbanczyk at ¶¶ 2-3. As of August 28, 2026, Amazon has not yet responded to the TRO, including retraining financial accounts or providing expedited discovery. *Id.*, at ¶¶ 3-4. Plaintiff will require expedited discovery to serve the Defendants with process and obtain information concerning the Defendants' accused activities.

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 requests that such good cause exist 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 to frustrate or preclude Plaintiff's equitable remedies. As discussed in Plaintiff's *Ex Parte* Motion for Entry of a Temporary Restraining Order, Including a Temporary Injunction, Expedited Discovery, and an Order to Show Cause, 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 September 16, 2026 and that the show cause hearing currently set for September 8, 2026 be accordingly continued.

Dated: August 28, 2026

Respectfully submitted,

/s/Adam E. Urbanczyk
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Affidavit 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 Georgia and the United States District Court for the Northern District of Georgia. I am the attorney for Logaro LLC (“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. Since receiving the TRO entered by this Court on August 19, 2026 [Dkt. 10], Plaintiff has been diligently working on ensuring third-party Amazon.com’s compliance with its terms by serving that third-party with the TRO and interfacing with that third party’s representatives.

3. As of August 28, 2026, Amazon does not yet appear to have implemented the injunctive components of the TRO. The expedited discovery has not yet been produced.

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

Executed this August 28, 2026 at Sarasota, Florida.

Respectfully submitted,

/s/Adam E. Urbanczyk
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