

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

LONDON INNOVATIONS, LLC,)	
)	
)	
Plaintiff,)	
)	No. 21-cv-6044
)	
v.)	
)	
)	
THE PARTNERSHIPS AND)	
UNINCORPORATED ASSOCIATIONS)	DEMAND FOR JURY TRIAL
IDENTIFIED IN SCHEDULE "A",)	
)	
)	
Defendants.)	

COMPLAINT

Plaintiff Landon Innovations, LLC, ("Plaintiff"), by and through its undersigned counsel, hereby files this Complaint for trademark infringement under the Lanham Act, offering for sale and selling counterfeit goods in violation of Plaintiff's exclusive rights, violations of the Illinois Deceptive Trade Practices Act and civil conspiracy against the partnerships and unincorporated associations identified in Schedule "A" (together, "Defendants"). In support hereof, Plaintiff states as follows:

I. JURISDICTION AND VENUE

1. This Court has original subject matter jurisdiction over the claims in this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051, et seq., 17 U.S.C. § 101, et seq., 28 U.S.C. § 1338(a)-(b) and 28 U.S.C. § 1331. This Court has jurisdiction over the claims in this action that arise under the laws of the State of Illinois pursuant to 28 U.S.C. § 1367(a) because the state law claims are so related to the federal claims that they form part of the same case or controversy and derive from a common nucleus of operative facts.

2. Venue is proper in this Court pursuant to 28 U.S.C. § 1391, and this Court may properly exercise personal jurisdiction over Defendants, since each Defendant directly targets business activities toward consumers in the United States, including Illinois, through their operation of or assistance in the operation of the fully interactive, commercial Internet stores operating under the Defendant domain names and/or the Defendant Internet Stores identified in Schedule A. Specifically, each of the Defendants directly reaches out to do business with Illinois residents by operating or assisting in the operation of one or more commercial, interactive e-commerce stores that sell products using counterfeit versions of Plaintiff's federally registered trademarks directly to Illinois consumers. In short, each Defendant is committing tortious acts in Illinois, is engaging in interstate commerce, and has wrongfully caused Plaintiff substantial injury in the state of Illinois.

II. INTRODUCTION

1. Plaintiff is requesting temporary *ex parte* relief in its Complaint for trademark infringement and counterfeiting, false designation of origin, violation of the Illinois Uniform Deceptive Trade Practices Act, copyright infringement, and civil conspiracy against the defendants identified on Schedule "A" to the Complaint (collectively, the "Defendants"). As alleged in Plaintiff's Complaint, Defendants are promoting, advertising, marketing, distributing, offering for sale, and/or selling unauthorized/unlicensed versions of Plaintiff's GORILLA GRIPPER branded lifting tools and products. Additionally, Defendants are using infringing and counterfeit versions of Plaintiff's federally registered GORILLA GRIPPER trademark through various fully interactive, commercial Internet stores operating under at least the seller aliases identified in Schedule "A" of the Complaint (collectively, "Defendant Internet Stores"). Nearly every Defendant Internet Store uses one or more of Plaintiff's copyrighted images and audiovisual

works, as well as derivative works therefrom (“Plaintiff’s Works”) without Plaintiff’s authorization, in order to bolster the false impression that the counterfeit goods are either genuine or authorized by Plaintiff.

2. Defendants have targeted sales to Illinois residents by setting up and operating one or more e-commerce Internet stores that target United States consumers using one or more seller aliases and offer shipping to the United States, including Illinois. E-commerce Internet stores operating under these seller aliases share unique identifiers establishing a logical relationship between them. Defendants further attempt to avoid and mitigate liability by operating under one or more of the seller aliases to conceal both their identities and the full scope and interworking of their operation. Plaintiff has been forced to file this action to combat Defendants’ counterfeiting of the federally registered GORILLA GRIPPER trademark, to protect unknowing consumers from purchasing counterfeit versions of the authentic GORILLA GRIPPER branded lifting tools over the Internet, and to enjoin Defendants’ infringement of Plaintiff’s Works. Defendants’ ongoing unlawful activities should be restrained, and Plaintiff respectfully requests that this Court issue a Temporary Restraining Order.

III. THE PARTIES

Plaintiff Creative Tunings, Inc.

3. Plaintiff is a California corporation and is the creator and seller of high-quality, unique hand-operated lifting tools that effectively and safely lifts items including, without limitation, heavy wood panels, sheet metal, and doors. Plaintiff sells these lifting tools and products through its brand GORILLA GRIPPER, which uniquely allows the lifter to lift cumbersome and heavy items with one hand while reducing risk of injury.

4. Plaintiff launched its brand GORILLA GRIPPER and GORILLA GRIPPER branded lifting tools in 2002 through design and invention of the GORILLA GRIPPER branded panel carrier. Plaintiff's founder and innovator created the unique GORILLA GRIPPER branded lifting tool design after assessing the need for a tool that would effectively grip and carry cumbersome sheets and panels used in construction and carpentry. The GORILLA GRIPPER branded lifting tool design relieves the strain placed on the back and other body parts when lifting heavy materials at work and in the home. Since 2002, Plaintiff has introduced several variations of the GORILLA GRIPPER branded lifting tool design. Plaintiff's unique lifting tools and products have been advertised with its federally registered trademark for several years. Plaintiff continues to heavily advertise its unique lifting tools and products on its website,^[1] social media, advertisements, and tool demonstration videos to educate consumers on both its technology and trademarked name. Its websites and social media feature original content, reviews and testimonials for GORILLA GRIPPER branded lifting tools and products.

5. Plaintiff is engaged in the business of manufacturing, distributing and retailing these high-quality lifting tools within the Northern District of Illinois under the Federally registered trademark GORILLA GRIPPER. Defendants' sales of the counterfeit product in violation of Plaintiff's intellectual property rights are irreparably damaging Plaintiff.

6. Plaintiff's brand, symbolized by the GORILLA GRIPPER trademark, is a recognized brand of high-quality panel handling tools. The GORILLA GRIPPER trademark is distinctive and identifies the merchandise as goods originating from Plaintiff. The registration for the GORILLA GRIPPER trademark constitutes prima facie evidence of its validity and of Plaintiff's exclusive right to use the GORILLA GRIPPER trademark pursuant to 15 U.S.C. § 1057(b). The GORILLA GRIPPER trademark has been continuously used and never abandoned since their first use.

7. Plaintiff uses the GORILLA GRIPPER trademark to identify its goods. The GORILLA GRIPPER trademark is distinct when it is applied to Plaintiff's product, signaling to the purchaser and consumer that the products are from Plaintiff and are made and manufactured to Plaintiff's original specifications and standards. Further, the use of the word elements "gorilla" and "gripper" together in advertising of the GORILLA GRIPPER product(s) are unique to Plaintiff.

8. Since its initial launch of the original GORILLA GRIPPER branded lifting tool, as of its claimed first use in commerce in 2002, Plaintiff's Trademark has been the subject of substantial and continuous marketing and promotion by the Plaintiff throughout the United States and, due to its strong internet presence, throughout the entire world. Plaintiff has and continues to widely promote and market its trademark to customers and the general public, and on Plaintiff's website. Genuine and authentic GORILLA GRIPPER branded lifting tools are offered and sold by Plaintiff directly over the Internet, through brick-and-mortar stores such as Lowes and other high-end tool retailers catering to both professional construction workers, carpenters, cabinetmakers, metalworkers and do-it-yourselfers.

9. Plaintiff has expended substantial time, money, and other resources in developing, advertising, and otherwise promoting the GORILLA GRIPPER trademark. As a result, customers and consumers recognize that lifting tools and products bearing the distinctive GORILLA GRIPPER trademark originate exclusively with Plaintiff.

THE DEFENDANTS

10. Defendants are individuals and entities who, upon information and belief, reside in the People's Republic of China or other foreign jurisdictions. Defendants conduct business throughout the United States, including within the state of Illinois and in this Judicial District, through the operation of the fully interactive commercial websites and online commercial

marketplaces operating under the Defendant Internet Stores. Each Defendant targets the United States, including Illinois, and has offered to sell and, on information and belief, has sold and continues to sell counterfeit products to consumers within the United States, including Illinois and in this Judicial District.

11. Defendants are an interrelated group of counterfeiters and infringers, who create numerous Defendant Internet Stores and design these stores to appear to be selling genuine GORILLA GRIPPER branded lifting tools and products, while they actual sell inferior imitations of Plaintiff's GORILLA GRIPPER lifting tools and products. The Defendant Internet Stores share unique identifiers, such as common design elements, the same or similar counterfeit product that they offer for sale, similar counterfeit product descriptions, the same or substantially similar shopping cart platforms, accepted payment methods, check-out methods, lack of contact information, identically or similarly priced counterfeit product and volume sale discounts, establishing a logical relationship between them and suggesting that Defendants' illegal operations arise out of the same transaction or occurrence. Tactics used by Defendants to conceal their identities and the full scope of their counterfeiting operation make it virtually impossible for Plaintiff to learn the precise scope and the exact interworking of their counterfeit network. In the event that Defendants provide additional credible information regarding their identities, Plaintiff will take appropriate steps to amend the Complaint.

THE DEFENDANTS' UNLAWFUL CONDUCT

12. The success of Plaintiff's brand has resulted in significant counterfeiting and infringement. Consequently, Plaintiff has identified numerous marketplace listings on eCommerce platforms such as, but not limited to, Alibaba, Aliexpress, Amazon, DHgate, eBay, Newegg, Shopify, Wish including the Defendant Aliases, which have been offering for sale, selling, and

exporting illegal products to consumers in this Judicial District and throughout the United States. Defendants have persisted in creating the Defendant Aliases. E-Commerce sales, including e-Commerce Internet Stores like those of Defendants, have resulted in a sharp increase in the shipment of unauthorized products into the United States. *See Exhibit 2*, Department of Homeland Security, *Fiscal Year 2019 Seizure Statistics Report*. According to Customs and Border Patrol's ("CBP") report, over 90% of all CBP intellectual property seizures were smaller international mail and express shipments (as opposed to large shipping containers). *Id.* Approximately 85% of CBP seizures originated from mainland China and Hong Kong. *Id.* Counterfeit and pirated products account for billions of dollars in economic losses, resulting in tens of thousands of lost jobs for legitimate businesses and broader economic losses, including lost tax revenue.

13. Counterfeiting rings are able to take advantage of the anonymity provided by the Internet which allows them to evade enforcement efforts to combat counterfeiting. For example, counterfeiters take advantage of the fact that marketplace platforms do not adequately subject new sellers to verification and confirmation of their identities, allowing counterfeiters to "routinely use false or inaccurate names and addresses when registering with these Internet platforms." *See Exhibit 3*, Daniel C.K. Chow, *Alibaba, Amazon, and Counterfeiting in the Age of the Internet*, 41 *NW. J. INT'L. L. & BUS.* 24 (2020). Additionally, "Internet commerce platforms create bureaucratic or technical hurdles in helping brand owners to locate or identify sources of counterfeits and counterfeiters." *Id.* at 25. Therefore, with the absence of regulation, Defendants may and do garner sales from Illinois residents by setting up and operating e-Commerce Internet Stores that target United States consumers using one or more aliases, offer shipping to the United States, including Illinois, accept payment in U.S. dollars, and, on information and belief, have sold counterfeit products to residents of Illinois.

14. Upon information and belief, at all times relevant hereto, the Defendants in this action have had full knowledge of Plaintiff's ownership of the GORILLA GRIPPER trademark, including its exclusive right to use and license such intellectual property and the goodwill associated therewith. Defendants' Internet Stores also use the same pictures to advertise their counterfeit product that Plaintiff uses on its webpage to sell and advertise its genuine and original GORILLA GRIPPER branded lifting tools, sowing further confusion among potential purchasers.

15. Defendants often go to great lengths to conceal their identities by using multiple fictitious names and addresses to register and operate their massive network of Defendant Internet Stores. Other Defendant domain names often use privacy services that conceal the owners' identity and contact information. Upon information and belief, Defendants regularly create new websites and online marketplace accounts on various platforms using the identities listed in Schedule A of the Complaint, as well as other unknown fictitious names and addresses. Such Defendant Internet Store registration patterns are one of the many common tactics used by the Defendants to conceal their identities, the full scope and interworking of their massive counterfeiting operation, and to avoid being shut down.

16. The counterfeit products for sale in the Defendant Internet Stores bear similarities and indicia of being related to one another, suggesting that the counterfeit products were manufactured by and come from a common source and that, upon information and belief, Defendants are interrelated.

17. Upon information and belief, Defendants also deceive unknowing customers by using the GORILLA GRIPPER trademark without authorization within the content, text, and/or meta tags of their websites to attract various search engines on the Internet looking for websites relevant to consumer searches for Plaintiff's GORILLA GRIPPER branded lifting tools.

Additionally, upon information and belief, Defendants use other unauthorized search engine optimization tactics and social media spamming so that the Defendant Internet Stores listings show up at or near the top of relevant search results after others are shut down. As such, Plaintiff also seeks to disable Defendant domain names owned by Defendants that are the means by which the Defendants could continue to sell counterfeit products.

18. Defendants' use of the trademark on or in connection with the advertising, marketing, distribution, offering for sale, and sale of the counterfeit products is likely to cause and has caused confusion, mistake, and deception by and among consumers and is irreparably harming Plaintiff. Defendants have manufactured, imported, distributed, offered for sale, and sold counterfeit products using the GORILLA GRIPPER trademark and continue to do so.

19. Defendants, without authorization or license from Plaintiff, knowingly and willfully used and continue to use the GORILLA GRIPPER trademark in connection with the advertisement, offer for sale, and sale of the counterfeit products, through, inter alia, the Internet. The counterfeit products are not genuine GORILLA GRIPPER branded lifting tools and products of the Plaintiff. The Plaintiff did not manufacture, inspect, or package the counterfeit lifting tools and products and did not approve the counterfeit lifting tools and products for sale or distribution. Each of the Defendants' Internet Stores offers shipping to the United States, including Illinois, and, on information and belief, each Defendant has sold counterfeit lifting tools and products into the United States, including Illinois.

20. Upon information and belief, Defendants will continue to register or acquire listings for the purpose of selling counterfeit lifting tools and products that infringe upon the GORILLA GRIPPER trademark unless preliminarily and permanently enjoined.

21. Defendants' use of the GORILLA GRIPPER trademark in connection with the advertising, distribution, offer for sale, and sale of counterfeit lifting tools and products, including the sale of counterfeit lifting tools and products into Illinois, is likely to cause and has caused confusion, mistake, and deception by and among consumers and is irreparably harming Plaintiff.

COUNT I
TRADEMARK INFRINGEMENT AND COUNTERFEITING
(15 U.S.C. § 1114)

22. Plaintiff hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 21.

23. This is a trademark infringement and counterfeit action against Defendants based on their unauthorized use in commerce of counterfeit imitations of the federally registered GORILLA GRIPPER Trademark in connection with the sale, offering for sale, distribution, and/or advertising of infringing goods. The GORILLA GRIPPER Trademark is a distinctive mark. Consumers have come to expect the highest quality from Plaintiff's lifting tools and products provided under Plaintiff's Trademark.

24. Defendants have sold, offered to sell, marketed, distributed, and advertised, and are still selling, offering to sell, marketing, distributing, and advertising products in connection with Plaintiff's Trademark without Plaintiff's permission.

25. Plaintiff is the exclusive owner of Plaintiff's Trademark and copyrights. Plaintiff's United States Registration for Plaintiff's Trademark and copyrights (**Exhibit 1**) is in full force and effect. Upon information and belief, Defendants have knowledge of Plaintiff's rights in Plaintiff's Trademark and are willfully infringing and intentionally using counterfeits of Plaintiff's Trademark. Defendants' willful, intentional, and unauthorized use of Plaintiff's Trademark is

likely to cause confusion, mistake, and deception as to the origin and quality of the counterfeit goods among the general consuming public.

26. Defendants' activities constitute willful trademark infringement and counterfeiting under Section 32 of the Lanham Act, 15 U.S.C. § 1114.

27. Plaintiff has no adequate remedy at law, and if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill of its well-known Plaintiff's Trademark.

28. The injuries sustained by Plaintiff have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offering to sell, and sale of counterfeit Plaintiff's GORILLA GRIPPER branded product.

COUNT II **FALSE DESIGNATION OF ORIGIN**

29. Plaintiff hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 28.

30. Defendants' promotion, marketing, offering for sale, and sale of infringing and counterfeit product has created and is creating a likelihood of confusion, mistake, and deception among the general public as to the affiliation, connection, or association with Plaintiff or the origin, sponsorship, or approval of Defendants' counterfeit version of Plaintiff's unique GORILLA GRIPPER branded lifting tools and products.

31. By using Plaintiff's Trademark in connection with the sale of counterfeit product, Defendants create a false designation of origin and a misleading representation of the fact as to the origin and sponsorship of the counterfeit product. By their use of Plaintiff's original photographs in association with the offer and sale of the counterfeit product, Defendants seek to further confuse the relevant public as to the source or sponsorship of their goods by Plaintiff.

32. Defendants' false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the counterfeit product to the general public is a willful violation of Section 43 of the Lanham Act, 15 U.S.C. § 1125.

33. Plaintiff has no adequate remedy at law and, if Defendants' actions are not enjoined, Plaintiff will continue to suffer irreparable harm to its reputation and the goodwill of its brand.

COUNT III
VIOLATION OF ILLINOIS UNIFORM DECEPTIVE TRADE PRACTICES ACT
(815 ILCS § 510, et seq.)

34. Plaintiff hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 33.

35. Defendants have engaged in acts violating Illinois law including, but not limited to, passing off their counterfeit product as those of Plaintiff, causing a likelihood of confusion and/or misunderstanding as to the source of their goods, causing a likelihood of confusion and/or misunderstanding as to an affiliation, connection, or association with Plaintiff's genuine and authentic GORILLA GRIPPER branded lifting tools, representing that their products have Plaintiff's approval when they do not, and engaging in other conduct which creates a likelihood of confusion or misunderstanding among the public.

36. The foregoing Defendants' acts constitute a willful violation of the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510, et seq.

37. Plaintiff has no adequate remedy at law, and Defendants' conduct has caused Plaintiff to suffer damage to its reputation and goodwill. Unless enjoined by this Court, Plaintiff will suffer future irreparable harm as a direct result of Defendants' unlawful activities.

COUNT IV
COPYRIGHT INFRINGEMENT
(17 U.S.C. § 501(a))

38. Plaintiff hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 37.

39. Plaintiff's Works have significant value and have been produced and created at considerable expense. Plaintiff is the owner of each original work, and all Works at issue have been registered with the U.S. Copyright Office. (See **Exhibit [I]**)

40. Plaintiff, at all relevant times, has been the holder of the pertinent exclusive rights infringed by Defendants, as alleged hereunder, including but not limited to the copyrighted Plaintiff's Works, including derivative works.

41. Upon information and belief, Defendants had access to the works through Plaintiff's normal business activities. After accessing Plaintiff's Works, Defendants wrongfully created copies of the copyrighted Plaintiff's Works without Plaintiff's consent and engaged in acts of widespread infringement through publishing and distributing the Plaintiff's Works via online websites and digital markets in connection with the marketing of their counterfeit products. Indeed, every photograph, video and video still image used by Defendants is virtually identical to the original Plaintiff's Works

42. Plaintiff is informed and believes and thereon alleges that Defendants further infringed Plaintiff's copyrights by making or causing to be made derivative works from Plaintiff's Works by producing and distributing reproductions without Plaintiff's permission.

43. Defendants, without the permission or consent of Plaintiff, have published online infringing derivative works of Plaintiff's Works. Defendants have violated Plaintiff's exclusive rights of reproduction and distribution. Defendants' actions constitute an infringement of Plaintiff's exclusive rights protected under the Copyright Act (17 U.S.C. § 101, et seq.).

44. Further, as a direct result of the acts of copyright infringement, Defendants have obtained direct and indirect profits they would not otherwise have realized but for their infringement of the copyrighted Plaintiff's Works. Plaintiff is entitled to disgorgement of Defendants' profits directly and indirectly attributable to their infringement of Plaintiff's Works.

45. The foregoing acts of infringement constitute a collective enterprise of shared, overlapping facts, and have been willful, intentional, and in disregard of and with indifference to the rights of Plaintiff.

46. As a result of Defendants' infringement of Plaintiff's exclusive rights under its copyright, Plaintiff is entitled to relief pursuant to 17 U.S.C. § 504.

47. The conduct of Defendants is causing, and unless enjoined and restrained by this Court, will continue to cause Plaintiff great and irreparable injury that cannot fully be compensated or measured in money. Plaintiff has no adequate remedy at law. Pursuant to 17 U.S.C. §§ 502 and 503, Plaintiff is entitled to injunctive relief prohibiting Defendants from further infringing Plaintiff's copyright and ordering that Defendants destroy all unauthorized copies. Defendants' copies, digital files, and other embodiments of Plaintiff's Works from which copies can be reproduced should be impounded and forfeited to Plaintiff as instruments of infringement, and all infringing copies created by Defendants should be impounded and forfeited to Plaintiff, under 17 U.S.C. § 503.

COUNT V
CIVIL CONSPIRACY

48. Plaintiff hereby re-alleges and incorporates by reference the allegations set forth in paragraphs 1 through 47.

49. Plaintiff is informed and believe and thereon alleges that Defendants knowingly and voluntarily entered into a scheme and agreement to engage in a combination of unlawful acts

and misconduct including, without limitation, a concerted and collaborated effort to maintain the distribution, marketing, advertising, shipping, offer for sale, or sale of counterfeit products in violation of the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510, et seq.

50. The intent, purpose, and objective of the conspiracy and the underlying combination of unlawful acts and misconduct committed by the Defendants was to undermine Plaintiff and its business by unfairly competing against it as described above.

51. The Defendants each understood and accepted the foregoing scheme and agreed to do their respective part, to further accomplish the foregoing intent, purpose, and objective. Thus, by entering into the conspiracy, each Defendant has deliberately, willfully, and maliciously permitted, encouraged, and/or induced all of the foregoing unlawful acts and misconduct.

52. As a direct and proximate cause of the unlawful acts and misconduct undertaken by each Defendant in furtherance of the conspiracy, Plaintiff has sustained, and unless each Defendant is restrained and enjoined, will continue to sustain severe, immediate, and irreparable harm, damage, and injury for which Plaintiff has no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants as follows:

1. That Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all other persons acting for, with, by, through, under, or in active concert with them be temporarily preliminary, and permanently enjoined and restrained from:

- a. Using Plaintiff's Trademark in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine product of Plaintiff, or is not authorized by Plaintiff to be sold in connection with Plaintiff's Trademark;

- b. Passing off, inducing, or enabling others to sell or pass off any product as a genuine Plaintiff's product or any other product produced by Plaintiff that is not Plaintiff's or not produced under the authority, control, or supervision of Plaintiff and approved by Plaintiff for sale under Plaintiff's Trademark and associated with or derived from Plaintiff's Trademark;
- c. Committing any acts calculated to cause consumers to believe that Defendants' counterfeit product is those sold under the authority, control, or supervision of Plaintiff, or are sponsored by, approved of, or otherwise connected with Plaintiff, including without limitation through use of Plaintiff's original photographs in connection with the offer or sale of counterfeit products;
- d. Further infringing Plaintiff's Trademark and damaging Plaintiff's goodwill;
- e. Otherwise competing unfairly with Plaintiff in any manner;
- f. Shipping (including drop-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 Plaintiff's Trademark, or any reproductions, counterfeit copies, or colorable imitations thereof;
- g. Using, linking to, transferring, selling, exercising control over, or otherwise owning the Defendant Internet Stores, or any other domain name or online marketplace account that is being used to sell or is the means by which Defendants could continue to sell counterfeit product;
- h. Operating and/or hosting websites at the Defendant Internet Stores of any other domain names registered or operated by Defendants that are involved in the distribution, marketing,

advertising, offering for sale, or sale of any product bearing the Plaintiff's Trademark or reproduction, counterfeit copy or colorable imitation thereof that is not a genuine product or not authorized by Plaintiff to be sold in connection with the Plaintiff's Trademark; and,

- i. Registering any additional domain names that use or incorporate any portion of the Plaintiff's Trademark; and,

2. That 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, preliminarily, and permanently enjoined and restrained from:

- a. Displaying images protected by the Plaintiff's Trademark in connection with the distribution, advertising, offer for sale and/or sale of any product that is not a genuine product of Plaintiff's or is not authorized by Plaintiff to be sold in connection with the Plaintiff's Trademark; and
- b. Shipping, delivering, holding for same, distributing, returning, transferring, or otherwise moving, storing, or disposing of in any manner products or inventory not manufactured by or for Plaintiff, not authorized by Plaintiff to be sold or offered for sale, and protected by the Plaintiff's Trademark or any reproductions, counterfeit copies, or colorable imitation thereof; and,

3. That Defendants, within fourteen (14) days after service of judgment with notice of entry thereof upon them, be required to file with the Court and serve upon Plaintiff a written report under oath setting forth in detail the manner and form in which Defendants have complied with paragraphs 1(a) through 1(g) above any and all injunctive relief ordered by this Court;

4. Entry of an Order that, upon Plaintiff's request, those in privity with Defendants and those with notice of the injunction, including any online marketplaces such as: Amazon and

Alibaba Group Holding Ltd., DHgate, eBay, Newegg , Shopify, Wish, Alipay.com Co., Ltd. and any related Alibaba entities (collectively “Alibaba”); social media platforms such as: Facebook, YouTube, LinkedIn, Twitter; Internet search engines such as Google, Bing, and Yahoo; webhosts for the Defendants Domain Names, and domain name registrars, that are provided with notice of the injunction, cease facilitating access to any or all webstores through which Defendants engage in the sale of counterfeit products using the Plaintiff’s Trademark; shall:

- a. Disable and cease providing services for any accounts through which Defendants engage in the sale of counterfeit Plaintiff’s GORILLA GRIPPER branded product using Plaintiff’s Trademark, including any accounts associated with the Defendants listed on Schedule A;
- b. Disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeiting and infringing counterfeit product using Plaintiff’s Trademark; and,
- c. Take all steps necessary to prevent links to the Defendant Online Stores identified in Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Online stores from any search index; and,

5. That Defendants account for and pay to Plaintiff all profits realized by Defendants by reason of Defendants’ unlawful acts herein alleged, and that the amount of damages for infringement of Plaintiff’s Trademark be increased by a sum not exceeding three times the amount thereof as provided by 15 U.S.C. § 1117;

6. For Judgment in favor of Plaintiff against Defendants that they have: (a) willfully infringed Plaintiff’s rights in its federally registered trademark pursuant to 15 U.S.C. § 1114; and (b) otherwise injured the business reputation and business of Plaintiff by Defendants’ acts and conduct set forth in this Complaint;

7. For Judgment in favor of Plaintiff against Defendants for actual damages or statutory damages pursuant to 15 U.S.C. § 1117, at the election of Plaintiffs, in an amount to be determined at trial;

8. In the alternative, that Plaintiff be awarded statutory damages pursuant to 15 U.S.C. § 1117(c)(2) of \$2,000,000 for each and every use of Plaintiff's Trademark;

9. For Judgment in favor of Plaintiff and against each Defendant for actual damages or for statutory damages pursuant to 17 U.S.C. § 504(c)(1) of up to \$30,000, or pursuant to 17 U.S.C. § 504(c)(2) of \$150,000 if such infringement is established as willful, for each and every one of Plaintiff's Works found to be infringed

10. That Plaintiff be awarded its reasonable attorneys' fees and costs; and,

11. That Plaintiff be awarded any and all other relief that this Court deems equitable and just.

Plaintiff demands trial by jury as to all causes of action so triable.

Dated:

Respectfully submitted,
/s/James E. Judge

Zareefa B. Flener (IL Bar No. 6281397)
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SCHEDULE A

Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
1	Yiwu Baowo Trading Co., Ltd.	1600162668148	-	n/a	Yes	GGR-1
2	Yiwu Changde Trading Co., Ltd.	1600178691001	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
3	Yiwu Dingyu Household Products Co., Ltd.	1600185104765	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
4	Yiwu Dongzhe Hardware Tools Co., Ltd.	1600172786963	-	n/a	Yes	GGR-video1
5	Chengdu Mazelen E-Commerce Co., Ltd.	1600111577304	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
5	Chengdu Mazelen E-Commerce Co., Ltd.	1600111578329	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
6	XI'AN GARIDA IMPORT AND EXPORT TRADE CO., LTD.	1600174083974	Yes	Gorilla Gripper	Yes	GGR-2,GGR-3
6	XI'AN GARIDA IMPORT AND EXPORT TRADE CO., LTD.	1600174093783	Yes	Gorilla Gripper	Yes	GGR-3
7	Yiwu Guanghao E-Commerce Co., Ltd.	1600095313847	Yes	Gorilla Gripper	Yes	GGR-2,GGR-video1
8	JYD (Shenzhen) Technology Co., Ltd.	1600103790931	Yes	Gorilla Gripper	-	n/a
9	Yiwu Hot Ecommerce Co., Ltd.	62139900186	-	n/a	Yes	GGR-video1
9	Yiwu Hot Ecommerce Co., Ltd.	62429964493	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
10	Yiwu Nice Daily Necessities Co., Limited	62223931783	-	n/a	Yes	GGR-2
11	Shanghai Vking Laser Beauty Co., Ltd.	1600249820987	Yes	Gorilla Gripper	Yes	GGR-1,GGR-video1
12	Yiwu Youge Daily Necessities Factory	1600158704017	-	n/a	Yes	GGR-2
13	Shenzhen Yiyang Technology Co., Ltd.	62367180706	Yes	Gorilla Gripper	-	n/a
14	Yiwu Haohao Import And Export Co., Ltd.	62053565041	-	n/a	Yes	GGR-1
14	Yiwu Haohao Import And Export Co., Ltd.	1600161987334	-	n/a	Yes	GGR-1
15	Yiwu Jiacheng Network Technology Co., Ltd.	1600163093252	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
16	Fengze Zhuozai Shoes And Clothing Online Store	1600227473131	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
17	Zhuhai Baowei E-Commerce Co., Ltd.	1600082244683	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
18	fairy supermarket	1005002787939140	-	n/a	Yes	GGR-video1
19	amy supermaket	1005002309613430	-	n/a	Yes	GGR-video1
20	YST-051	1005002304320590	-	n/a	Yes	GGR-video1
21	Common Truth	1005001942889540	Yes	Gorilla Gripper	Yes	GGR-video1
22	Go better life	1005002804563990	-	n/a	Yes	GGR-1,GGR-2
23	Dream House Store	1005001943327090	Yes	Gorilla Gripper	Yes	GGR-video1
24	BongKim Tool Store	1005002771249160	-	n/a	Yes	GGR-video1
25	enjoybuy Store	1005002375139640	Yes	Gorilla Gripper	Yes	GGR-video1
26	KingPet Market Store	1005002693304300	-	n/a	Yes	GGR-1,GGR-2
27	Wonder4 U Store	1005002686813610	-	n/a	Yes	GGR-video1
28	My little grocery Store	1005002034170140	-	n/a	Yes	GGR-video1
29	Universalmall Store	1005001941206480	Yes	Gorilla Gripper	Yes	GGR-video1
30	Yourhom Dropshipping Store	1005001943014470	Yes	Gorilla Gripper	Yes	GGR-video1
31	Kitchenware KITCHEN Store	1005002073706630	-	n/a	Yes	GGR-video1
32	Mr. TOOI Store	1005002611859780	-	n/a	Yes	GGR-1,GGR-2
33	Tool-Light-Improvement Store	1005002333506200	-	n/a	Yes	GGR-video1
34	Prossional Tool Design Store	32961050924	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
35	HBYSK Store	1005002363906250	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
36	Manual Tools Store	1005002090100050	Yes	Gorilla Gripper	Yes	GGR-video1
37	Offer Tools Dropshipping Store	1005002070651060	Yes	Gorilla Gripper	Yes	GGR-video1
38	HOUSE SHOP Store	1005002667808230	-	n/a	Yes	GGR-1,GGR-2
39	LoveOurLife Store	33055353095	Yes	Gorilla Gripper	-	n/a
40	Shop4450011 Store	1005002016870560	-	n/a	Yes	GGR-video1
41	A Breathing Store	1005002295127520	-	n/a	Yes	GGR-video1

Landon Innovations, LLC v.
The Partnerships and Unincorporated Associations
Identified on Schedule "A"

SCHEDULE A

Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
42	ChuHeng Tool Store	32978335322	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3,GGR-video1
42	ChuHeng Tool Store	1005001586930170	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3,GGR-video1
42	ChuHeng Tool Store	32959724777	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3,GGR-video1
43	Buy Buy Buy Life Store Store	1005001626161540	-	n/a	Yes	GGR-1,GGR-2
44	Lifegugu Store	1005001942890530	Yes	Gorilla Gripper	Yes	GGR-video1
45	A Cozy Store	1005002899005480	-	n/a	Yes	GGR-1,GGR-2
46	VOGVIGO Familylove Store	1005002176064990	-	n/a	Yes	GGR-1
47	KAYE 100% Cheap Tool Store	1005002003827130	-	n/a	Yes	GGR-video1
47	KAYE 100% Cheap Tool Store	1005002913452020	Yes	Gorilla Gripper	-	n/a
48	@LuckyHome@ Store	1005002022034740	-	n/a	Yes	GGR-video1
49	Toorise Official Store	1005002765802960	-	n/a	Yes	GGR-video1
50	INOHERB Store	1005002741249740	Yes	Gorilla Gripper	Yes	GGR-video1
51	pine Store	1005002919734420	Yes	Gorilla Gripper	-	n/a
52	Homefull using Department Store	1005002418410600	-	n/a	Yes	GGR-video1
53	Enthusiastic girl Store	1005002234994080	-	n/a	Yes	GGR-video1
54	Lohas 's Store	4000360554354	Yes	Gorilla Gripper	-	n/a
55	HandHelp Tool Store	1005002418392830	-	n/a	Yes	GGR-video1
56	Have Funny Store	1005002048827520	-	n/a	Yes	GGR-video1
57	HINSOO Store	1005002101121970	-	n/a	Yes	GGR-video1
58	Shop5111002 Store	1005002006622850	-	n/a	Yes	GGR-video1
59	Ur Pro Hommland Store	1005002954043720	-	n/a	Yes	GGR-video1
60	Malord Mlilton Store	1005002417085300	-	n/a	Yes	GGR-video1
61	Shop5250039 Store	1005002869144910	Yes	Gorilla Gripper	Yes	GGR-video1
62	Mintiml dropship Store	1005002876429780	Yes	Gorilla Gripper	Yes	GGR-2
63	Shop5419091 Store	1005002007266590	-	n/a	Yes	GGR-video1
64	Ali's House Store	1005001846479140	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
65	DYJ Professional tool Store	1005001586768160	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
66	Dropship Pro Store	1005002210723720	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3,GGR-video1
67	Wheat Tool Store	1005001275714670	Yes	Gorilla Gripper	Yes	GGR-2,GGR-video1
67	Wheat Tool Store	1005001275779460	Yes	Gorilla Gripper	Yes	GGR-2,GGR-video1
68	Factory direct sales components Store	1005001470410650	-	n/a	Yes	GGR-video1
69	Hands DIY Your Pro Tools Store	1005002837295360	Yes	Gorilla Gripper	Yes	GGR-video1
69	Hands DIY Your Pro Tools Store	1005002837133530	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
70	Daily Houseware Store	1005001954370180	Yes	Gorilla Gripper	Yes	GGR-video1
71	BR service Store	1005001480024510	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-1
72	Shop5870424 Store	1005001470667550	-	n/a	Yes	GGR-video1
73	TAITU Global Store	1005001597099150	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
74	WORKBRO Store	1005001446533980	-	n/a	Yes	GGR-video1
75	Homer Tools Store	1005002674729320	-	n/a	Yes	GGR-video1
76	Shop910336350 Store	1005002344064540	-	n/a	Yes	GGR-video1
77	JJ Furnishing Store	1005002063813100	-	n/a	Yes	GGR-video1
78	Your Electronic-Product Store	1005002829320610	-	n/a	Yes	GGR-1,GGR-3
79	Shop910559225 Store	1005002210687970	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3,GGR-video1
80	Eversowagen Store	1005002830642400	Yes	Gorilla Gripper	Yes	GGR-video1
80	Eversowagen Store	1005002830630420	Yes	Gorilla Gripper	Yes	GGR-video1

SCHEDULE A

Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
81	New Dropshipping Store	1005002074775860	Yes	Gorilla Gripper	Yes	GGR-video1
82	Shop910960018 Store	1005002526475370	-	n/a	Yes	GGR-video1
83	HTL Professional Tool Store	1005001697437390	-	n/a	Yes	GGR-video1
84	Contact-Me Store	1005002718684820	-	n/a	Yes	GGR-1,GGR-3
85	JUMAO CncParts Store	1005002560497320	Yes	Gorilla Gripper	Yes	GGR-video1
86	YJWK Store	1005002901519510	-	n/a	Yes	GGR-1,GGR-3
87	Shop911224130 Store	1005002129484390	-	n/a	Yes	GGR-video1
88	Lunan Commerce Co., Ltd. Store	1005001934254930	-	n/a	Yes	GGR-1,GGR-2
89	ATopoler 050 Store	1005002837355130	Yes	Gorilla Gripper	Yes	GGR-video1
89	ATopoler 050 Store	1005002837127840	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
90	Your tool room Store	1005002368643970	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
90	Your tool room Store	1005002468933870	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
90	Your tool room Store	1005002368574480	Yes	Gorilla Gripper	-	n/a
90	Your tool room Store	1005002368699630	-	n/a	Yes	GGR-video1,GGR-2
90	Your tool room Store	1005002469047040	-	n/a	Yes	GGR-video1,GGR-2
91	Inight Tools Store	1005002196946700	Yes	Gorilla Gripper	-	n/a
91	Inight Tools Store	1005002376881120	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
91	Inight Tools Store	1005002342010520	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
92	Hotaden Store	1005002260645100	Yes	Gorilla Gripper	-	n/a
92	Hotaden Store	1005002364071850	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
92	Hotaden Store	1005002364126550	-	n/a	Yes	GGR-video1,GGR-2
93	Your Little House Store	1005002739341100	-	n/a	Yes	GGR-1,GGR-3
93	Your Little House Store	1005002717266240	-	n/a	Yes	GGR-video1
94	Jokapy Pro Tools Store	1005002741310100	-	n/a	Yes	GGR-video1
94	Jokapy Pro Tools Store	1005002741230800	-	n/a	Yes	GGR-video1
95	SHome improvement Store	1005002912644330	Yes	Gorilla Gripper	-	n/a
96	Manual life Store	1005002458515720	-	n/a	Yes	GGR-1,GGR-3
97	Shop 77523 Store	1005002567836280	-	n/a	Yes	GGR-video1
98	YCI TOOLS Store	1005002395334600	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
98	YCI TOOLS Store	1005002395392050	-	n/a	Yes	GGR-video1,GGR-2
99	QWEE Store	1005002351120110	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
100	CC 1314 Store	1005002701896110	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
101	4280 Shop Store	1005002711635890	-	n/a	Yes	GGR-video1
102	Papaya digital Store	1005002500260780	-	n/a	Yes	GGR-video1
103	Friends Tool Store	1005002382231420	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
103	Friends Tool Store	1005002382169880	-	n/a	Yes	GGR-video1,GGR-2
104	Shopping Well Store Store	1005002559745500	-	n/a	Yes	GGR-video1
105	Upper Tools Global Store	1005002431786450	-	n/a	Yes	GGR-video1
106	Alphabeta Tool Store	1005002401248670	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
106	Alphabeta Tool Store	1005002395802440	Yes	Gorilla Gripper	-	n/a
106	Alphabeta Tool Store	1005002401329150	-	n/a	Yes	GGR-video1,GGR-2
107	BUY YEAH! Store	1005002597556450	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
108	Json Li Store	1005002649975510	-	n/a	Yes	GGR-video1
109	beauty Store	1005002417999250	-	n/a	Yes	GGR-video1
110	OLG OK Store	1005002512786810	-	n/a	Yes	GGR-video1

SCHEDULE A

Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
111	Bizarre Tool Shop Store	1005002418064120	-	n/a	Yes	GGR-video1
112	DE SHUN Store	1005002534423420	-	n/a	Yes	GGR-video1
113	Model Tools Store	1005002565709300	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
114	Practical toolbox Store	1005002567369090	Yes	Gorilla Gripper	Yes	GGR-video1,GGR-2
115	Home-Happiness Store	1005002858394670	Yes	Gorilla Gripper	Yes	GGR-video1
115	Home-Happiness Store	1005002858415510	Yes	Gorilla Gripper	Yes	GGR-video1
115	Home-Happiness Store	1005002858365920	Yes	Gorilla Gripper	Yes	GGR-video1
116	CPP DAILY Store	1005002834149320	-	n/a	Yes	GGR-1,GGR-2
117	practical products & tools Store	1005002707857800	-	n/a	Yes	GGR-video1
118	Mr Fu's 678 Store	1005002818564210	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
119	XXXTool Store	1005002655688350	-	n/a	Yes	GGR-video1
120	Hai tools Store	1005002613878380	-	n/a	Yes	GGR-video1
121	JIAJUZHU Store	1005002914417170	Yes	Gorilla Gripper	-	n/a
122	S-Home improvement tools Store	1005002841071100	-	n/a	Yes	GGR-video1
123	Yiwu Wenxi Store	1005002951532300	-	n/a	Yes	GGR-1,GGR-2
124	For Your Warm Life Store	1005002927908050	Yes	Gorilla Gripper	-	n/a
125	SunshineFaceStore	B097DMPNSR	Yes	Gorilla Gripper	-	n/a
126	Bigking-EU	B08SHNM5XK	-	n/a	Yes	GGR-video1
127	chunfenghuwaiyongpindian	B08H5SHF2X	Yes	Gorilla Gripper	-	n/a
127	chunfenghuwaiyongpindian	B08H5SHF2X	Yes	Gorilla Gripper	-	n/a
128	DE Galen	B08WWL6WWQ	Yes	Gorilla Gripper	-	n/a
129	Gransun-US	B08PVWHM2V	-	n/a	Yes	GGR-2,GGR-video1
130	Zhiyadianzi	B08ZHN3JC7	-	n/a	Yes	GGR-2
130	Zhiyadianzi	B08ZJ75NCC	-	n/a	Yes	GGR-2,GGR-video1
130	Zhiyadianzi	B08ZJ7ZN7J	-	n/a	Yes	GGR-2
131	sinuoxiang	B094JKYNHN	Yes	Gorilla Gripper	-	n/a
132	Jadpes mg	B07Y2Y3TVP	-	n/a	Yes	GGR-2,GGR-video1
133	BESTOMZ	B092D7KS4F	Yes	Gorilla Gripper	-	n/a
133	BESTOMZ	B092HVVD64	Yes	Gorilla Gripper	-	n/a
134	Bowen-US	B08FY2JGR5	Yes	Gorilla Gripper	-	n/a
135	Perfect for you Adult demand	B07GSG1SB5	-	n/a	Yes	GGR-1
135	Perfetto per te Richiesta per adulti	B07GSG1SB5	-	n/a	Yes	GGR-1
135	Perfecto para ti. Demanda adulta	B07GSG1SB5	-	n/a	Yes	GGR-1
135	Perfetto per te Richiesta per adulti	B07GSGQTBH	-	n/a	Yes	GGR-1
135	Perfecto para ti. Demanda adulta	B07GSGQTBH	-	n/a	Yes	GGR-1
136	JuXinAnKJ	B08YTKC6TB	-	n/a	Yes	GGR-2
136	JuXinAnKJ	B08YTKC6TB	-	n/a	Yes	GGR-2
136	JuXinAnKJ	B08YTKC6TB	-	n/a	Yes	GGR-2
136	JuXinAnKJ	B08Z3LB3YT	-	n/a	Yes	GGR-video1,GGR-2
136	JuXinAnKJ	B08Z3LB3YT	-	n/a	Yes	GGR-2,GGR-video1
136	JuXinAnKJ	B08Z3LB3YT	-	n/a	Yes	GGR-2,GGR-video1
136	JuXinAnKJ	B0936ZBK5P	-	n/a	Yes	GGR-video1
136	JuXinAnKJ	B0936ZBK5P	-	n/a	Yes	GGR-video1
136	JuXinAnKJ	B0936ZBK5P	-	n/a	Yes	GGR-video1
137	Golden State Experss Inc.	B08MDRGX5R	-	n/a	Yes	GGR-1

SCHEDULE A

Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
138	LuoYangWenHeHuaGongChanPinYouXianGongSi	B08MJ19J6K	-	n/a	Yes	GGR-1
139	xianmengx	B098T539GN	Yes	Gorilla Gripper	-	n/a
140	DaMohony_90	B0991NVL5Q	Yes	Gorilla Gripper	-	n/a
141	v9x310	B08XT9NF4B	-	n/a	Yes	GGR-video1
142	24SEVEN SALES LTD	B08GZ9DJDS	Yes	Gorilla Gripper	-	n/a
143	Sumounty	B08R75GN53	Yes	Gorilla Gripper	-	n/a
144	HJRWJD	B08DD4BQHP	-	n/a	Yes	GGR-video1
145	LHHSP	B093Q4XFBS	-	n/a	Yes	GGR-1,GGR-video1
145	LHHSP	B093Q4XFBS	-	n/a	Yes	GGR-video1,GGR-1
145	LHHSP	B093Q52LRB	-	n/a	Yes	GGR-video1
145	LHHSP	B093Q52LRB	-	n/a	Yes	GGR-video1
146	Gesiji	B094NKJZM7	Yes	Gorilla Gripper	-	n/a
146	Gesiji	B094NKSNT	Yes	Gorilla Gripper	-	n/a
147	Grow168	B08R64CMSV	Yes	Gorilla Gripper	-	n/a
148	Mamaluti Designs	B08291K3C1	Yes	Gorilla Gripper	-	n/a
149	limingshangmaoj	B08R2HXG65	Yes	Gorilla Gripper	-	n/a
150	SENLING	B08WLZV6NQ	Yes	Gorilla Gripper	-	n/a
151	Fayomet US	B096K9V9GT	Yes	Gorilla Gripper	-	n/a
152	Oddalsail	B081YCCQCG	-	n/a	Yes	GGR-1,GGR-2
153	Oriental Pro	B08ZHPQYZ	-	n/a	Yes	GGR-2
153	Oriental Pro	B08ZHRHY7R	-	n/a	Yes	GGR-video1,GGR-2
154	EElabper.	B08VDHG3H	Yes	Gorilla Gripper	-	n/a
155	十分満足する	B08L4YQZM2	Yes	Gorilla Gripper	-	n/a
156	Chiloskit tool	B07F3WLYHW	Yes	Gorilla Gripper	-	n/a
156	Chiloskit top	B07F3WLYHW	Yes	Gorilla Gripper	-	n/a
157	Find4Fix	B08VRMND2D	-	n/a	Yes	GGR-1
158	OVZSGUY	B0972DX23D	-	n/a	Yes	GGR-video1,GGR-2
158	OVZSGUY	B0972DX23D	-	n/a	Yes	GGR-video1,GGR-2
158	OVZSGUY	B0972CXBPH	Yes	Gorilla Gripper	-	n/a
158	OVZSGUY	B0972CXBPH	Yes	Gorilla Gripper	-	n/a
159	TBTC	B08PRVYSTS	Yes	Gorilla Gripper	Yes	GGR-1
160	JYFJJ	B095736XX1	Yes	Gorilla Gripper	-	n/a
161	FLZengXian	B091BVTVD	-	n/a	Yes	GGR-2
162	brasot	B07J5D96J3	-	n/a	Yes	GGR-2
162	brasot	B07J5D96J3	-	n/a	Yes	GGR-2
162	brasot	B07J69QW4S	Yes	Gorilla Gripper	Yes	GGR-2
162	brasot	B07J69QW4S	Yes	Gorilla Gripper	Yes	GGR-2
163	ZJJ-US	B08XVDC8BT	-	n/a	Yes	GGR-video1
164	luohemaolanshangmaoyouxian	B094YCR198	-	n/a	Yes	GGR-1,GGR-video1
164	luohemaolanshangmaoyouxian	B094YCR198	-	n/a	Yes	GGR-1,GGR-2,GGR-3,GGR-video1
164	luohemaolanshangmaoyouxian	B094YCSDC3	-	n/a	Yes	GGR-1
164	luohemaolanshangmaoyouxian	B094YCSDC3	-	n/a	Yes	GGR-1,GGR-3
164	luohemaolanshangmaoyouxian	B094YF9W2Z	-	n/a	Yes	GGR-1,GGR-2
164	luohemaolanshangmaoyouxian	B094YF9W2Z	-	n/a	Yes	GGR-1,GGR-2,GGR-3
164	luohemaolanshangmaoyouxian	B094YFN7BQ	-	n/a	Yes	GGR-video1

SCHEDULE A

Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
164	luohemaolanshangmaoyouxian	B094YFN7BQ	-	n/a	Yes	GGR-video1
164	luohemaolanshangmaoyouxian	B094YGC63R	Yes	Gorilla Gripper	-	n/a
164	luohemaolanshangmaoyouxian	B094YGC63R	Yes	Gorilla Gripper	-	n/a
164	luohemaolanshangmaoyouxian	B094YGXNMJ	-	n/a	Yes	GGR-video1
164	luohemaolanshangmaoyouxian	B094YGXNMJ	-	n/a	Yes	GGR-video1
164	luohemaolanshangmaoyouxian	B094YD9R6N	Yes	Gorilla Gripper	-	n/a
164	luohemaolanshangmaoyouxian	B094YD9R6N	Yes	Gorilla Gripper	-	n/a
164	luohemaolanshangmaoyouxian	B094YDPBSX	Yes	Gorilla Gripper	-	n/a
164	luohemaolanshangmaoyouxian	B094YDPBSX	Yes	Gorilla Gripper	-	n/a
164	luohemaolanshangmaoyouxian	B094YGBWQB	Yes	Gorilla Gripper	-	n/a
164	luohemaolanshangmaoyouxian	B094YGBWQB	Yes	Gorilla Gripper	-	n/a
165	JINGUI STORE	B08GCLCP56	-	n/a	Yes	GGR-1
166	QIONGLIN	B095NVHVFV	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095NVM2FK	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095MPGFGL	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095MPGFGL	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095MRQGN2	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095PBF7C4	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095PBF7C4	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095WN7FVN	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095WN7FVN	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095YKD8BL	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B095YKD8BL	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B0963L94LL	Yes	Gorilla Gripper	-	n/a
166	QIONGLIN	B0963L94LL	Yes	Gorilla Gripper	-	n/a
167	first one6688	B0991Y7WMF	-	n/a	Yes	GGR-video1
168	Binjazzg-US	B093GBRSQ6	Yes	Gorilla Gripper	-	n/a
168	Binjazzg-US	B093GBRSQ6	Yes	Gorilla Gripper	-	n/a
169	YoHey	B093BXS7X9	Yes	Gorilla Gripper	-	n/a
170	(10-15 Days Arrival)Qiao Run Trading	B094JXKMND	Yes	Gorilla Gripper	-	n/a
171	Binxory Inc	B085Y8FSJ2	-	n/a	Yes	GGR-2,GGR-video1
172	PJSTORE	B081MX1K1Z	Yes	Gorilla Gripper	-	n/a
173	Wnesoza	B08PZF1GKF	-	n/a	Yes	GGR-2,GGR-video1
174	nianying	B08XZ9Q8WY	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
175	jklymm	B08XT9NF4B	-	n/a	Yes	GGR-video1
176	Precise-Bargains	B08348D3SR	-	n/a	Yes	GGR-1
177	thisoughc	B08SBVWCLV	-	n/a	Yes	GGR-video1
178	XiaoYuUS	B0919QX3WG	Yes	Gorilla Gripper	-	n/a
178	XiaoYuUS	B091B3S95D	Yes	Gorilla Gripper	-	n/a
179	Asixx#1	B08SMKTK2R	-	n/a	Yes	GGR-2,GGR-video1
180	Russlph	B0915MJGLK	-	n/a	Yes	GGR-video1
181	ChangJiuBaoFu	B094NMK9WJ	Yes	Gorilla Gripper	-	n/a
182	KnowStoree	B08SHHXFTG	-	n/a	Yes	GGR-2,GGR-video1
183	TaiYuanShiXiaoDianQuLiDuBinGuan	B08SPZZP9Q	Yes	Gorilla Gripper	Yes	GGR-video1
183	TaiYuanShiXiaoDianQuLiDuBinGuan	B08YWPDKB7	-	n/a	Yes	GGR-1

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Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
184	ElectronicNova	B07R737HNT	Yes	Gorilla Gripper	-	n/a
185	aidpreneur	B08NP8HGJC	Yes	Gorilla Gripper	-	n/a
186	Esake	B08B4JH5GS	-	n/a	Yes	GGR-video1
186	Esake	B08B4JH5GS	-	n/a	Yes	GGR-2,GGR-video1
187	【10-15 Days Delivery】 XBK-love	B094J9C3V3	Yes	Gorilla Gripper	-	n/a
188	HJRWJD	B08DD4RZK5	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
188	HJRWJD	B08DD6QY93	-	n/a	Yes	GGR-video1
188	HJRWJD	B08DD71PDK	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
188	HJRWJD	B08DD71TDM	Yes	Gorilla Gripper	Yes	GGR-2,GGR-3
189	JDJAJ	B095YLVYJ4	Yes	Gorilla Gripper	Yes	GGR-video1
190	Adamely	B0991J7MVN	-	n/a	Yes	GGR-1,GGR-2
191	ODDING	B08254F2CC	-	n/a	Yes	GGR-1,GGR-3
192	DERCLIVE_115NA	B096K5M192	Yes	Gorilla Gripper	-	n/a
193	Rodalind	B093GH2JPJ	Yes	Gorilla Gripper	-	n/a
193	Rodalind	B093KTQ641	Yes	Gorilla Gripper	-	n/a
194	EnPoint	B08N5Z7L4H	Yes	Gorilla Gripper	-	n/a
194	EnPoint	B08N5ZWMBY	Yes	Gorilla Gripper	-	n/a
194	EnPoint	B08N615RT5	Yes	Gorilla Gripper	-	n/a
194	EnPoint	B08N62LVYL	Yes	Gorilla Gripper	-	n/a
194	EnPoint	B093B1SJ4M	Yes	Gorilla Gripper	-	n/a
194	EnPoint	B098RYTXPD	Yes	Gorilla Gripper	-	n/a
194	EnPoint	B098SCN2ND	Yes	Gorilla Gripper	-	n/a
194	EnPoint	B098SWYRC2	Yes	Gorilla Gripper	-	n/a
194	EnPoint	B098SWYS9B	Yes	Gorilla Gripper	-	n/a
195	rawstroe	B08PVWSMF6	-	n/a	Yes	GGR-2,GGR-video1
196	ylq2019	B08S3H5XZH	Yes	Gorilla Gripper	-	n/a
196	ylq2019	B08S3H5XZH	Yes	Gorilla Gripper	-	n/a
197	WangXu shop	B08F7P5BGR	Yes	Gorilla Gripper	-	n/a
198	Lujiahao	B094JYWGK8	Yes	Gorilla Gripper	-	n/a
199	CHUICC商社	B097N8LY63	Yes	Gorilla Gripper	-	n/a
200	LUYU SHOP	B08R5WXCXN	Yes	Gorilla Gripper	-	n/a
201	Yunhany Direct	B096KFR7JB	Yes	Gorilla Gripper	-	n/a
201	yunhanfazhipin	B096KFR7JB	Yes	Gorilla Gripper	-	n/a
202	RuoHUAf	B092HV6GH5	-	n/a	Yes	GGR-2
202	RuoHUAf	B094QV6VHY	-	n/a	Yes	GGR-video1,GGR-2
202	RuoHUAf	B094QV6VHY	-	n/a	Yes	GGR-2,GGR-video1
202	RuoHUAf	B0957J26Q6	-	n/a	Yes	GGR-video1
202	RuoHUAf	B0957J26Q6	-	n/a	Yes	GGR-video1
202	RuoHUAf	B095WTF7Q2	-	n/a	Yes	GGR-video1
202	RuoHUAf	B095WTF7Q2	-	n/a	Yes	GGR-video1
202	RuoHUAf	B0995PKQ3Q	-	n/a	Yes	GGR-2,GGR-video1
202	RuoHUAf	B091YBTW5R	Yes	Gorilla Gripper	-	n/a
202	RuoHUAf	B091YBTW5R	Yes	Gorilla Gripper	-	n/a
202	RuoHUAf	B092J1G11X	Yes	Gorilla Gripper	-	n/a
202	RuoHUAf	B092J1G11X	Yes	Gorilla Gripper	-	n/a

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Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
203	sihaina	B09374W724	-	n/a	Yes	GGR-video1
204	zhangjieus	B097T6KVHF	-	n/a	Yes	GGR-1,GGR-video1
205	lvxiaobing	B083RVNXC8	-	n/a	Yes	GGR-video1
205	lvxiaobing	B083RVNXC8	-	n/a	Yes	GGR-video1
205	lvxiaobing	B083RVNXC8	-	n/a	Yes	GGR-video1
205	lvxiaobing	B08G51LH2J	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
206	Aifeizo	B08G4Z3HBC	-	n/a	Yes	GGR-video1,GGR-2
207	YsyYtsuy	B093Q91XRF	-	n/a	Yes	GGR-2
208	wanzi2	B094N1F8JG	Yes	Gorilla Gripper	-	n/a
209	Longstreet	B08DNM9GZG	Yes	Gorilla Gripper	-	n/a
210	taiyuanshixiaodianquliuhiufenshanghang	B091TLT34S	-	n/a	Yes	GGR-2,GGR-video1
210	taiyuanshixiaodianquliuhiufenshanghang	B091TMW82C	-	n/a	Yes	GGR-video1
210	taiyuanshixiaodianquliuhiufenshanghang	B091TNBZTJ	-	n/a	Yes	GGR-video1
210	taiyuanshixiaodianquliuhiufenshanghang	B091TNGXM5	-	n/a	Yes	GGR-video1
210	taiyuanshixiaodianquliuhiufenshanghang	B091TQNNQY	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
210	taiyuanshixiaodianquliuhiufenshanghang	B091TM85KB	Yes	Gorilla Gripper	-	n/a
210	taiyuanshixiaodianquliuhiufenshanghang	B091TN7B8F	Yes	Gorilla Gripper	-	n/a
210	taiyuanshixiaodianquliuhiufenshanghang	B091TPRXMZ	Yes	Gorilla Gripper	-	n/a
211	xigua&shuang	B094N236N2	Yes	Gorilla Gripper	-	n/a
212	RUI ZHANB	B095YRJ4WV	-	n/a	Yes	GGR-video1
213	Katja per	B08QDBQPKW	-	n/a	Yes	GGR-2,GGR-video1
213	Katja per	B08QCMFJN2	Yes	Gorilla Gripper	-	n/a
213	Katja per	B08QCMFJN2	Yes	Gorilla Gripper	-	n/a
214	Kind-hearted	B0946MMCHG	Yes	Gorilla Gripper	-	n/a
215	CNluca	B0987V8SRK	-	n/a	Yes	GGR-1,GGR-2
215	CNluca	B0987V8SRK	-	n/a	Yes	GGR-1,GGR-2
215	CNluca	B099JZL5XS	Yes	Gorilla Gripper	-	n/a
216	cat red	B07F1R3W82	Yes	Gorilla Gripper	Yes	GGR-2
216	cat red	B07F1R3W82	Yes	Gorilla Gripper	Yes	GGR-2
216	cat red	B07F1R3W82	Yes	Gorilla Gripper	Yes	GGR-2
216	cat red	B07F1WX4Z6	-	n/a	Yes	GGR-2
216	cat red	B07F1WX4Z6	-	n/a	Yes	GGR-2
216	cat red	B07F1WX4Z6	-	n/a	Yes	GGR-2
216	cat red	B07KW5CKH8	-	n/a	Yes	GGR-2
216	cat red	B07KW5CKH8	-	n/a	Yes	GGR-2
216	cat red	B07KW5CKH8	-	n/a	Yes	GGR-2
216	cat red	B07KW5CKH8	-	n/a	Yes	GGR-2
216	cat red	B07QZXN4W4	Yes	Gorilla Gripper	-	n/a
216	cat red	B07QZXN4W4	Yes	Gorilla Gripper	-	n/a
216	cat red	B07QZXN4W4	Yes	Gorilla Gripper	-	n/a
216	cat red	B07QZXN4W4	Yes	Gorilla Gripper	-	n/a
217	gxiangshibaihu	B08NT21GGH	Yes	Gorilla Gripper	-	n/a
218	GUONING-L 商社	B08GFR4H14	Yes	Gorilla Gripper	-	n/a
219	dithesmx	B08SBXMMX3	-	n/a	Yes	GGR-2
220	Jimfoty	B08PSK8R26	-	n/a	Yes	GGR-2,GGR-video1

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Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
221	paialu	B07QC5W7GQ	Yes	Gorilla Gripper	Yes	GGR-2
222	ForwardFour	B08SJNR218	Yes	Gorilla Gripper	-	n/a
223	HDYEHGBDJ	B08R8H1DXL	Yes	Gorilla Gripper	-	n/a
224	facingnorth	B08L8SG6Y7	Yes	Gorilla Gripper	-	n/a
225	urjipstore	B097DQYVG1	-	n/a	Yes	GGR-1,GGR-2
226	fulailai	B08XB1LH6Y	-	n/a	Yes	GGR-video1
227	WnssoGroup	B08GZ9DJDS	Yes	Gorilla Gripper	-	n/a
228	songruyunxiao	B096FPC3D9	Yes	Gorilla Gripper	-	n/a
229	lvxiaobingg	B083RVNXC8	-	n/a	Yes	GGR-video1
230	Eurobuy18	B0967T95FZ	Yes	Gorilla Gripper	-	n/a
231	KESHENGER	B08MTCZKRY	Yes	Gorilla Gripper	-	n/a
232	MKKMG	B08R73L9H5	Yes	Gorilla Gripper	-	n/a
233	Tutoy	B07ZFCWRP8	Yes	Gorilla Gripper	-	n/a
233	Tutoy	B07ZFCWRP8	Yes	Gorilla Gripper	-	n/a
234	zhaozhang4-US	B08SJKRVLB	-	n/a	Yes	GGR-2,GGR-video1
235	GouQiangLine5	B094XXGB8Z	Yes	Gorilla Gripper	-	n/a
236	shuddering	B097ZRF9XZ	Yes	Gorilla Gripper	-	n/a
237	Shen zhen shi jing ming ya ke ji you xian gong si	B08Y55YR1D	-	n/a	Yes	GGR-video1,GGR-2
238	tethalxw99-US	B08SBXSTV5	-	n/a	Yes	GGR-2
239	datongshidaanjiansheanzhuangyouxianzerengongsi	B08GFJPRNH	-	n/a	Yes	GGR-1,GGR-2
240	behone	B07XBS6DY3	Yes	Gorilla Gripper	Yes	GGR-2,GGR-video1
241	taiyuanshixiaodianqubingyushangdian	B083RVNXC8	-	n/a	Yes	GGR-video1
241	taiyuanshixiaodianqubingyushangdian	B083RVNXC8	-	n/a	Yes	GGR-video1
241	taiyuanshixiaodianqubingyushangdian	B08G51LH2J	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
242	gxiaddingb	B089YN5KHL	Yes	Gorilla Gripper	-	n/a
243	Diydeg520	B08Q2D765X	-	n/a	Yes	GGR-2,GGR-video1
244	chensijun20189547	B08F9YDJBY	Yes	Gorilla Gripper	-	n/a
245	MEIJINGJINGSHAOP	B092YHT6T4	Yes	Gorilla Gripper	Yes	GGR-2
245	MEIJINGJINGSHAOP	B092Z9D3M3	-	n/a	Yes	GGR-2
246	Felenny2020	B09687D68W	Yes	Gorilla Gripper	-	n/a
247	JIEGUOGO	B08NC3WXWL	Yes	Gorilla Gripper	-	n/a
248	greatgg	B096VJ4SGR	Yes	Gorilla Gripper	-	n/a
248	greatgg	B096VJ4SGR	Yes	Gorilla Gripper	-	n/a
249	And Taihang Construction	B094Y8QRT2	Yes	Gorilla Gripper	-	n/a
250	Mooess	B08L3VS53K	-	n/a	Yes	GGR-1
251	Wecrun-US	B08P8VN2Y	Yes	Gorilla Gripper	-	n/a
252	liuLmanGaiy	B094JMSNJ	-	n/a	Yes	GGR-1
253	Qux	B08MQGQZQZ	-	n/a	Yes	GGR-video1
254	Owilke	B0967XQ9MY	Yes	Gorilla Gripper	-	n/a
255	Yuanjusheng-US	B08RRTG5FP	-	n/a	Yes	GGR-video1
256	greatbeck	B07K2TDGXH	-	n/a	Yes	GGR-1,GGR-2
257	Zewivet-US	B095X3NV9D	Yes	Gorilla Gripper	-	n/a
258	HYDDNice	B092HZ9M6S	Yes	Gorilla Gripper	-	n/a
259	OhhGo-2021	B096S2R31B	Yes	Gorilla Gripper	-	n/a
260	Happyfly01	B0919KHC2Y	-	n/a	Yes	GGR-2

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Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
260	Happyfly01	B0919KHC2Y	Yes	Gorilla Gripper	Yes	GGR-2
260	Happyfly01	B0919KHC2Y	-	n/a	Yes	GGR-2
260	Happyfly01	B0919KHC2Y	-	n/a	Yes	GGR-2
261	Duyifan	B08MLPZF4Y	-	n/a	Yes	GGR-1,GGR-video1
262	zhangjie-eu1	B097T6KVHF	-	n/a	Yes	GGR-1,GGR-video1
263	JingqiZZGreat	B096NK9T3P	Yes	Gorilla Gripper	-	n/a
263	JingqiZZGreat	B096NK9T3P	Yes	Gorilla Gripper	-	n/a
264	Gerumo-US	B0957HK1LL	-	n/a	Yes	GGR-video1,GGR-2
265	IUido	B092H9BW7L	-	n/a	Yes	GGR-video1
265	IUido	B092H9BW7L	-	n/a	Yes	GGR-video1
265	IUido	B092ZS33CW	-	n/a	Yes	GGR-2,GGR-video1
266	HBBHSH	B08W4K2RXC	Yes	Gorilla Gripper	-	n/a
267	QingY1	B0928VKY5G	-	n/a	Yes	GGR-2,GGR-video1
268	LIZANAN商社	B08MLLBS1	Yes	Gorilla Gripper	-	n/a
269	LCSJ	B09811D3Z3	-	n/a	Yes	GGR-video1
269	LCSJ	B09811D3Z3	-	n/a	Yes	GGR-video1
269	LCSJ	B09811D3Z3	-	n/a	Yes	GGR-video1
270	Rolity2020	B08FX5V5T4	-	n/a	Yes	GGR-2,GGR-video1
271	RMBLNL	B07KWXHH1X	-	n/a	Yes	GGR-2
271	RMBLNL	B07QZYCXWH	Yes	Gorilla Gripper	-	n/a
271	RMBLNL	B07QZYCXWH	Yes	Gorilla Gripper	-	n/a
272	久盛商貿	B095PTFR9S	Yes	Gorilla Gripper	-	n/a
273	ANJUYA	B07R4YT6R5	Yes	Gorilla Gripper	Yes	GGR-2
274	Qomimei-US	B095XTPTPF	Yes	Gorilla Gripper	-	n/a
275	shinesone	B08QJH8Z3P	-	n/a	Yes	GGR-video1
276	SumnewTech	B08MJG7RNQ	Yes	Gorilla Gripper	-	n/a
276	SumnewTech	B08YRFTT2T	Yes	Gorilla Gripper	-	n/a
277	dumamaoyi	B091SKVQV9	-	n/a	Yes	GGR-video1
277	dumamaoyi	B091SXP3ND	-	n/a	Yes	GGR-2
278	Skioriotre	B094CQ1JF5	-	n/a	Yes	GGR-video1
278	Skioriotre	B094CQ1JF5	-	n/a	Yes	GGR-video1
278	Skioriotre	B094CQ1JF5	-	n/a	Yes	GGR-video1
279	HuiHaos	B092V3QKJR	-	n/a	Yes	GGR-2,GGR-video1
280	Szliyands	B089FM7J3R	-	n/a	Yes	GGR-video1
281	NTUOO	B082PSB1C1	-	n/a	Yes	GGR-1,GGR-3
282	julik141rajv	B093SR6JL8	-	n/a	Yes	GGR-video1
282	julik141rajv	B09684WJ4S	-	n/a	Yes	GGR-video1
282	julik141rajv	B09684WJ4S	-	n/a	Yes	GGR-video1
283	Deryant	B08Q667CW8	-	n/a	Yes	GGR-2,GGR-video1
284	YJBstore	B08SVNBHPL	Yes	Gorilla Gripper	Yes	GGR-video1
284	YJBstore	B08SVNBHPL	Yes	Gorilla Gripper	Yes	GGR-video1
284	YJBstore	B08SW6YLH5	Yes	Gorilla Gripper	Yes	GGR-video1
284	YJBstore	B08SW6YLH5	Yes	Gorilla Gripper	Yes	GGR-video1
285	One of the best sellers	B07F9Z3FX5	Yes	Gorilla Gripper	Yes	GGR-1
285	One of the best sellers	B07FJLVVTK	Yes	Gorilla Gripper	Yes	GGR-1

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Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
285	One of the best sellers	B07FJLVVTK	-	n/a	Yes	GGR-2
286	dao768t	B093LV9PTC	Yes	Gorilla Gripper	-	n/a
287	oujimai	B08YWYKL6K	Yes	Gorilla Gripper	-	n/a
288	ZIYUKEJI28SU	B094CHTYM8	Yes	Gorilla Gripper	-	n/a
289	VI 55hapy	B094PRTRC8	Yes	Gorilla Gripper	-	n/a
290	yuanhaourty	B08YMW6RFW	-	n/a	Yes	GGR-video1
291	Zeromall	B08YMM5WRB	Yes	Gorilla Gripper	Yes	GGR-1
292	Cheng+	B08QVKJVHW	Yes	Gorilla Gripper	-	n/a
293	Hinzonek	B096G344S8	Yes	Gorilla Gripper	-	n/a
294	Riseed-US	B08P8PJZ92	Yes	Gorilla Gripper	-	n/a
294	Riseed-US	B08P8PJZ92	Yes	Gorilla Gripper	-	n/a
295	youyuxianlantianshajikaifayouxianzerengongsi	B097PZNTQW	-	n/a	Yes	GGR-video1
295	youyuxianlantianshajikaifayouxianzerengongsi	B097Q265FT	-	n/a	Yes	GGR-video1
295	youyuxianlantianshajikaifayouxianzerengongsi	B097Q2BM9M	-	n/a	Yes	GGR-video1
295	youyuxianlantianshajikaifayouxianzerengongsi	B097RDW41V	Yes	Gorilla Gripper	-	n/a
295	youyuxianlantianshajikaifayouxianzerengongsi	B097RF147V	Yes	Gorilla Gripper	Yes	GGR-2
295	youyuxianlantianshajikaifayouxianzerengongsi	B097RFR8V4	-	n/a	Yes	GGR-2
295	youyuxianlantianshajikaifayouxianzerengongsi	B097RGRZJM	Yes	Gorilla Gripper	-	n/a
296	My Villa Store	B089M73VDC	-	n/a	Yes	GGR-1
297	Sugoyi	B08TR8R9FN	-	n/a	Yes	GGR-2,GGR-video1
298	faguchengxianhengyangjiancaixiaoshouyouxiangongsi	B08YYHDWG7	-	n/a	Yes	GGR-2
298	faguchengxianhengyangjiancaixiaoshouyouxiangongsi	B08YYHNGHG	Yes	Gorilla Gripper	Yes	GGR-2
299	Wushuang Tech	B094D6VJRD	Yes	Gorilla Gripper	Yes	GGR-video1
300	FuYuanStore	B07ZVSZCSB	Yes	Gorilla Gripper	-	n/a
301	Vojties	B099RHL7LS	-	n/a	Yes	GGR-video1
302	yaritsi	701075823	-	n/a	Yes	GGR-1,GGR-2
303	bestness	708165458	-	n/a	Yes	GGR-1,GGR-2
304	baixiangguo	625446613	-	n/a	Yes	GGR-video1
304	baixiangguo	696174987	-	n/a	Yes	GGR-1,GGR-2
305	baiqiliu	702744823	-	n/a	Yes	GGR-1,GGR-2
306	2ndheaven2013	203523633554	Yes	Gorilla Gripper	Yes	GGR-video1
307	blackgirlya	324657047571	-	n/a	Yes	GGR-1,GGR-video1
308	book-warehouse	393439269093	Yes	Gorilla Gripper	-	n/a
309	bookmarkdeals	333882426766	Yes	Gorilla Gripper	-	n/a
310	cartongessonline_web	154033366422	Yes	Gorilla Gripper	-	n/a
310	cartongessonline_web	164321531179	Yes	Gorilla Gripper	-	n/a
311	country11zone	303007298462	-	n/a	Yes	GGR-2
312	cuddly-toys1	283413896342	-	n/a	Yes	GGR-1,GGR-2
313	deoutshopdeals	164948731439	Yes	Gorilla Gripper	Yes	GGR-video1
314	einor_gaby	184041374933	-	n/a	Yes	GGR-1
315	epicedeals	203478741558	-	n/a	Yes	GGR-video1
316	epicesolutions	284042171830	-	n/a	Yes	GGR-video1
317	everythingsupply	133707216161	-	n/a	Yes	GGR-3
317	everythingsupply	133707958531	-	n/a	Yes	GGR-1
317	everythingsupply	133707960392	-	n/a	-	n/a

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Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
318	fairymoon-01	224533306329	Yes	Gorilla Gripper	Yes	GGR-video1
319	freetrade2016	164111145250	Yes	Gorilla Gripper	-	n/a
320	general.ware	123740474127	Yes	Gorilla Gripper	Yes	GGR-2
321	gigimotor_88	384246651537	-	n/a	Yes	GGR-3
322	gonghang18	373646745368	-	n/a	Yes	GGR-1,GGR-2
323	happyeasybuy01	114879564783	Yes	Gorilla Gripper	Yes	GGR-video1
324	hz-red	373441014064	Yes	Gorilla Gripper	-	n/a
325	igiftbox	202560333341	Yes	Gorilla Gripper	Yes	GGR-2
326	jenlain2020	402978905306	-	n/a	Yes	GGR-1
327	jiedaokou	303847036343	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
328	joseph-shop10	303250064339	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
329	lahirsandakelu_6	284374571496	-	n/a	Yes	GGR-1,GGR-3
330	lazad2019	393095752052	-	n/a	Yes	GGR-1,GGR-2
331	lchcz20	373570999601	-	n/a	Yes	GGR-1,GGR-2
332	magic-product1	302931256787	-	n/a	Yes	GGR-1,GGR-3
333	manthus-80	233974687003	-	n/a	Yes	GGR-1
334	nasserb-41	384258291749	Yes	Gorilla Gripper	-	n/a
335	nowmystore	133575635542	Yes	Gorilla Gripper	-	n/a
336	plain_carpet	124789870547	Yes	Gorilla Gripper	Yes	GGR-2
337	rg_supplies	114811634051	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
338	rishi_store	383879431273	-	n/a	Yes	GGR-1,GGR-2
339	sales-justforyou	233916880855	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
340	teerapan_psb	224441456253	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
341	thusst-0	313433415436	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
342	toutpourpascher	144063273891	Yes	Gorilla Gripper	Yes	GGR-1
343	wensh48	164873794858	-	n/a	Yes	GGR-video1
344	yinhezaixian2014	254698160517	Yes	Gorilla Gripper	Yes	GGR-video1
345	ymkm86	174568406008	Yes	Gorilla Gripper	-	n/a
346	yosteps	284197370959	-	n/a	Yes	GGR-video1
347	yyusf5	313380705441	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
348	za-fashionjewelry	333960488651	-	n/a	Yes	GGR-2,GGR-3
348	za-fashionjewelry	333961933929	Yes	Gorilla Gripper	Yes	GGR-3
349	HomeDDQ	5fa79f054346ac0107250c61	Yes	Gorilla Gripper	-	n/a
350	cnhrsea	0X6-04KT-0JG47	Yes	Gorilla Gripper	-	n/a
350	cnhrsea	0X6-04KT-0JGD1	Yes	Gorilla Gripper	Yes	GGR-2
350	cnhrsea	0X6-04KT-0P6S0	-	n/a	Yes	GGR-1
350	cnhrsea	0X6-04KT-0TKN7	Yes	Gorilla Gripper	Yes	GGR-2
350	cnhrsea	0X6-04KT-0TKS1	Yes	Gorilla Gripper	-	n/a
350	cnhrsea	0X6-04KT-0XAS3	Yes	Gorilla Gripper	Yes	GGR-2
350	cnhrsea	0X6-04KT-1H9G9	Yes	Gorilla Gripper	-	n/a
350	cnhrsea	0X6-04KT-1J1A2	Yes	Gorilla Gripper	Yes	GGR-2
350	cnhrsea	0X6-04KT-1K529	Yes	Gorilla Gripper	Yes	GGR-2
350	cnhrsea	0X6-04KT-20GY0	Yes	Gorilla Gripper	Yes	GGR-2
350	cnhrsea	2S7-06CR-0TEP2	-	n/a	Yes	GGR-1,GGR-2
350	cnhrsea	2S7-06CR-0U267	-	n/a	Yes	GGR-1,GGR-2,GGR-3

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Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
350	cnhrsea	2S7-06CR-0U7N4	-	n/a	Yes	GGR-1,GGR-2,GGR-3
350	cnhrsea	2S7-06CR-0U7R7	-	n/a	Yes	GGR-1,GGR-2,GGR-3
350	cnhrsea	2S7-06CR-0UMT1	Yes	Gorilla Gripper	-	n/a
351	Monkey World	0ZZ-00R-04BX3	Yes	Gorilla Gripper	-	n/a
351	Monkey World	11J-02UX-02H66	Yes	Gorilla Gripper	Yes	GGR-2
351	Monkey World	11J-02UX-03042	Yes	Gorilla Gripper	-	n/a
351	Monkey World	11J-02UX-032K7	Yes	Gorilla Gripper	Yes	GGR-2
352	budgetmall1.myshopify.com	gorilla-gripper-special-home-furniture-tool	Yes	Gorilla Gripper	-	n/a
353	ceinfina.myshopify.com	cei_b08vrmnd2d	-	n/a	Yes	GGR-1
354	dronetok.com	handwerkzeuge-gorilla-gripper	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
355	galaxyadd.com	advantage	-	n/a	Yes	GGR-1
356	justgreenbox.com	gorilla-gripper	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
357	odditymart.com	gorilla-gripper-advantage	Yes	Gorilla Gripper	Yes	GGR-3
358	afang	5f800817537e3213dba3c44f	Yes	Gorilla Gripper	Yes	GGR-1
359	yingfei2	5f80088b474962139fe194d1	Yes	Gorilla Gripper	Yes	GGR-1
360	caixia	5f50aa375a382513e50c1ed0	Yes	Gorilla Gripper	Yes	GGR-1
361	luliming	5f50a6ba84b8ff1377dd88be	Yes	Gorilla Gripper	Yes	GGR-1
362	suxinhong	5f50a6da8eaa7613d87fa72f	Yes	Gorilla Gripper	Yes	GGR-1
363	lilong	606ecd00f317784bb7926a7	Yes	Gorilla Gripper	Yes	GGR-1
364	jiangmeicui	606ece46f99658c27341d4c3	Yes	Gorilla Gripper	Yes	GGR-1
365	huangguan	606ece89f2108aaff2b2ff89	Yes	Gorilla Gripper	-	n/a
366	mybrighteststar	6099ef2956ee45997fb4c670	Yes	Gorilla Gripper	Yes	GGR-1
367	US3-5days_arrive	600fbe0edb3ab100447aa72a	Yes	Gorilla Gripper	Yes	GGR-1
368	Zabrina77	60a6117b3947b6f40fb3eaf7	-	n/a	Yes	GGR-3
369	Aimee girl	60a61149084c06ea7897c97c	-	n/a	Yes	GGR-3
370	XiaoQQ	60aa597324f88add718be2da	-	n/a	Yes	GGR-1,GGR-3,GGR-video1
371	Dingdang dang	5c8766998e117432b74ef3a0	Yes	Gorilla Gripper	-	n/a
372	Mountaintop NI	5eafd1754683c31a02cb68e1	Yes	Gorilla Gripper	-	n/a
373	tengguixiang	600e6c41e9ad3b0ff4e79565	Yes	Gorilla Gripper	Yes	GGR-1
374	Emerging hardware store	60a5c2a0459c46319845c085	Yes	Gorilla Gripper	-	n/a
375	Smartpp	5e70d906a74f458221351db8	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
376	WYU Complicated	5bfe73f35bda22568c92ee84	Yes	Gorilla Gripper	-	n/a
377	Alice zhang dedianpu	600e6c44572a822f4f8b6cac	Yes	Gorilla Gripper	Yes	GGR-1
378	Sevenzzone	5f4eec3d33a1a5004a6e075f	Yes	Gorilla Gripper	-	n/a
379	I love rapeseed oil	600fbe108e7d11fbdfbed8b9	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
380	Dennis Hardware&Fittings	5c128343d9d3dd2dd0ca0e33	Yes	Gorilla Gripper	-	n/a
381	MysteriousEastern	5f02dd60b18e0c786ff78d46	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2
382	qiuqiunikk	5e5ca744a4fb09736c588d62	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
383	ubobostore	60d57f531d960af1fb7e2a0c	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
384	chenxufeis	600fbe1435e0ab005156b741	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
385	Arcticweather	609a3a97fe353f2430ffdea6	Yes	Gorilla Gripper	Yes	GGR-1,GGR-video1
386	luosahngming	60dc2b1ded251fd33fb59e80	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
387	Steely fitting	5e5f592d17f94d0059c34685	Yes	Gorilla Gripper	Yes	GGR-1
388	ZCdevgru0906	5e2000bd9cdd1d08dfe23087	Yes	Gorilla Gripper	Yes	GGR-1
388	ZCdevgru0906	5e843eb7d4bc6540a8ae8b6a	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3

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Doe #	Merchant Name	Product ID	TM Infringed?	Trademark Used	Copyright Infringed?	Copyright Used File Names
389	LikeMark	6056128131295a6eeed0b41	-	n/a	Yes	GGR-video1
389	LikeMark	60575a44b37c63c1cefc211	-	n/a	Yes	GGR-3
389	LikeMark	60575fa470d609e69b18a432	Yes	Gorilla Gripper	-	n/a
389	LikeMark	6055e50461c680e37b9511bf	Yes	Gorilla Gripper	-	n/a
389	LikeMark	6055f0b88ce4bc0c62eac8ce	Yes	Gorilla Gripper	-	n/a
389	LikeMark	6055f966949a0924ce89ed05	Yes	Gorilla Gripper	-	n/a
389	LikeMark	60577e3f517b3e53d9369aae	Yes	Gorilla Gripper	-	n/a
389	LikeMark	6057818f8c6d5e65020fd2e6	Yes	Gorilla Gripper	-	n/a
390	all tool home	6073f671b6a17e68abc45733	Yes	Gorilla Gripper	-	n/a
391	yuehai	5f5f38a54e45b4c941f87af5	Yes	Gorilla Gripper	Yes	GGR-1
392	xinpaigianjiu	5e65a193c6ead8915aac22c1	Yes	Gorilla Gripper	-	n/a
393	Sadness1	60a36e274095c98b9b08f68c	Yes	Gorilla Gripper	-	n/a
394	huahuashijiehenhao	5e0c7af17f0ef6009388ce34	Yes	Gorilla Gripper	-	n/a
395	iBeddingstore	5f8fa479e26b85003b3dabe1	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
396	iBedding-POD	5f8fa4669396fc0042f929ed	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
397	jocko1ig68gu	606f786547977bd5449c1e77	-	n/a	Yes	GGR-2,GGR-3
398	Janice M Lunsford	60a518d1956d26e6c3f78bde	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
399	Mary M Lund	60783abd3782932c90b8255f	Yes	Gorilla Gripper	Yes	GGR-1,GGR-3
400	tossaosobxd	5ef4013a4bbe7f05ccfa952b	Yes	Gorilla Gripper	-	n/a
400	tossaosobxd	5f080ffd10c4131e1197684f	Yes	Gorilla Gripper	-	n/a
401	setetahtlh	5ee1e1ce842d193f554b7772	Yes	Gorilla Gripper	-	n/a
401	setetahtlh	5f080fe5fcc85c09c4fa321f	Yes	Gorilla Gripper	-	n/a
402	soatinht	5ee1e1c2765d083e9601745f	Yes	Gorilla Gripper	-	n/a
402	soatinht	5f080fdcfec0cde1d5ac7a5a5	Yes	Gorilla Gripper	-	n/a
403	ljhaey	603df91cbc6fe2f915a88931	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
404	jahntah	603df92fecc110fd3da3d4ff	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
405	mariawshterd	609093bbd379e504c724f68d	Yes	Gorilla Gripper	Yes	GGR-1
406	waestmastel	60e2dbf3634cfa9635e3ff48	-	n/a	Yes	GGR-1,GGR-3
407	OIHGKXHRD	609631ae356936876ba98c35	Yes	Gorilla Gripper	-	n/a
408	exceptious	60bef3feb17ccfa561ee38bc	Yes	Gorilla Gripper	Yes	GGR-1,GGR-2,GGR-3
409	stores keila	60903196f117ca86792ad70d	Yes	Gorilla Gripper	Yes	GGR-1
410	wangyutaoksdI	609258cc0bb01f44d30ce119	-	n/a	Yes	GGR-1
411	nativeeast	60bc7092ec4ccc3cb8792a64	Yes	Gorilla Gripper	Yes	GGR-1
412	Hurricanechat	60c8d6150c1c8e0644aa78dc	-	n/a	Yes	GGR-1,GGR-2,GGR-video1
412	Hurricanechat	60cda234e84c7203d9b829fc	-	n/a	Yes	GGR-3
413	Kilbazar	60dc336309edc90695faae67	-	n/a	Yes	GGR-1,GGR-2,GGR-3
414	Kennetblaze	60d23b7b6025c687ae03b24c	-	n/a	Yes	GGR-3
415	RicScore	60dc25d72b0166ba82d0bc1b	-	n/a	Yes	GGR-3
416	11368796 CANADA CORPORATION	603fd0290940c2004530dc36	-	n/a	Yes	GGR-video1
417	meiyuan405466899	60b58b3a015e215fd1d0f8a8	-	n/a	Yes	GGR-2
418	Bidove	608a8ee1c34c014a7f091b44	-	n/a	Yes	GGR-2