## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

TRT, LLC,

Plaintiff,

v.

Case No. 23-cv-16575

THE PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED IN SCHEDULE "A",

Judge John J. Tharp, Jr. Magistrate Judge Gabriel A. Fuentes

Defendants.

## PLAINTIFF'S MOTION FOR ENTRY OF A PRELIMINARY INJUNCTION, CONTINUED ASSET RESTRAINT, AND EXPEDITED DISCOVERY

Plaintiff TRT, LLC ("Plaintiff") seeks entry of a Preliminary Injunction against Defendants listed in <u>Exhibit 1</u> who have been successfully served by December 28, 2023, enjoining the manufacture, importation, distribution, offering for sale, and sale of infringing and counterfeit products, a temporary asset restraint, and expedited discovery in an action arising out of 15 U.S.C. § 1114, 15 U.S.C. § 1125(a), 17 U.S.C. § 501(a), 35 U.S.C. § 271, and Illinois law. A Memorandum of Law in Support is filed concurrently.

Dated: January 2, 2024 Respectfully submitted,

/s/ James E. Judge

Zareefa B. Flener (IL Bar No. 6281397) James E. Judge (IL Bar No. 6243206) Patrycia Piaskowski (IL Bar No. 6346239) Flener IP Law, LLC 77 W. Washington St., Suite 800 Chicago IL 60602 (312) 724-8874 jjudge@fleneriplaw.com

<sup>&</sup>lt;sup>1</sup> Plaintiff had not been able to serve defendants associated with Alibaba and AliExpress because contact information for those defendants had not been provided by the entity pursuant to Plaintiff's Subpoena issued when TRO was entered. Plaintiff will file a separate motion for a preliminary injunction against the missing defendants when they have been successfully served.