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DEC 17 2019

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

CLERK U.S. DISTRICT COURT
WEST. DIST. OF PENNSYLVANIA

DOGGIE DENTAL INC., *et al.*,

Plaintiffs,

Civil Action No. 19-1627

v.

AHUI, *et al.*,

Defendants.

FILED UNDER SEAL

[PROPOSED] 1) TEMPORARY RESTRAINING ORDER; 2) ORDER RESTRAINING ASSETS AND MERCHANT STOREFRONTS; 3) ORDER TO SHOW CAUSE WHY A PRELIMINARY INJUNCTION SHOULD NOT ISSUE; AND 4) ORDER AUTHORIZING EXPEDITED DISCOVERY

This matter is before the Court upon Plaintiffs' *Ex Parte* Application for the following: 1) a temporary restraining order; 2) an order restraining assets and Merchant Storefronts (as defined *infra*); 3) an order to show cause why a preliminary injunction should not issue; and 4) an order authorizing expedited discovery against the Defendants identified on **Schedule "A"** to the Complaint and attached hereto (collectively, the "Defendants"). The Court has considered the Application, the evidence in the record, and the applicable law.

By the instant Application, Plaintiffs Doggie Dental Inc. and Peter Dertsakyan move *ex parte* pursuant to 35 U.S.C. § 283, Federal Rules of Civil Procedure 64 and 65, and The All Writs Act, 28 U.S.C. § 1651(a), for entry of a temporary restraining order and an order restraining assets and Merchant Storefronts, for violations of the Patent Act. Because Plaintiffs have satisfied the requirements for the issuance of a temporary restraining order, the Court grants Plaintiffs' Application.

FACTUAL FINDINGS & CONCLUSION OF LAW

1. Plaintiffs, Doggie Dental, Inc. (“Doggie Dental”) and Peter Dertsakyan (“Dertsakyan”), are likely to prevail on their Patent Act claim at trial.
2. Dertsakyan is the inventor of the BRISTLY[®] dog toothbrush (“Plaintiffs’ Product”) and the owner of intellectual property related thereto; Doggie Dental is the exclusive licensee of such intellectual property. Plaintiffs developed and sell a unique and revolutionary product under the federally registered trademark BRISTLY[®] (“Plaintiffs’ Mark”) that safely and easily permits dogs to brush their own teeth removing plaque and tarter.
3. Dertsakyan is the owner of U.S. Trademark Registration No. 5,815,298 for BRISTLY directed to “Non-medicated dental preparations for pets, namely, toothpaste and preparations for removing plaque; Home dental care products for dogs and cats, namely, toothpaste; Dental care and oral hygiene products for pets, namely, tooth cleaning preparations; Non-edible dental chews for pets; Non-medicated oral dental chews for dogs.”
4. Dertsakyan is the owner of U.S. Trademark Registration No. 5,844,832 for BRISTLY directed to “Toothbrushes for animals; Toothbrushes for pets; Home dental care products for dogs and cats, namely, toothbrush.”
5. Dertsakyan is the owner of U.S. copyright registration VA 2-122-455 directed to various photographs related to the BRISTLY[®] dog toothbrush (the “Plaintiffs’ Works”). Dertsakyan is also the owner of unregistered copyrights related to the Plaintiffs’ Product.
6. In addition, Dertsakyan is also the owner of various design patent applications directed to the BRISTLY[®] dog toothbrush, including an issued European Registered Community

Design (005818606-0001), a pending U.S. design patent application, and a pending Chinese design patent application.

7. Dertsakyan is the owner of U.S. Patent No. 10477838 for “Pet chew toy for dental self-cleaning by domestic pets,” (Plaintiffs’ Patent” or “the ‘838 Patent”).

8. Defendants, by operating Internet based e-commerce stores, and fully interactive, commercial Internet websites operating under Defendants’ respective seller identities set forth on Schedule “A” hereto (the “Seller IDs”), have advertised, promoted, sold, and offered for sale that Plaintiffs have determined are not genuine BRISTLY[®] products and infringe at least one claim of the ‘838 patent.

9. Through the e-commerce marketplace platform, Plaintiffs accessed all of the e-commerce stores operating under Defendants’ Seller IDs and captured the Defendants’ listings at issue on the e-commerce stores. At the conclusion of the process, the detailed webpages and photographs were inspected by Plaintiffs’ representative who confirmed that each Defendant is offering for sale products and infringe upon at least one claim of the Plaintiffs’ Patent (“Infringing Products”).

10. Plaintiffs, as well as consumers and animal owners, are likely to suffer immediate and irreparable losses, damages and injuries before Defendants can be heard in opposition, unless Plaintiffs’ Application for *ex parte* relief is granted. There is good cause to believe that the unauthorized and unlicensed offering for sale and sale of Infringing Products will continue in the marketplace; that consumers are likely to be misled, confused, and disappointed by the quality of the products so advertised, and that Plaintiffs may suffer loss of sales for their genuine products and an unnatural erosion of the legitimate marketplace in which they operate. There is also good cause to believe that if Plaintiffs proceed on notice to Defendants of this Application,

Defendants can easily and quickly change the ownership or modify e-commerce store account data and content, change payment accounts, redirect consumer traffic to other seller identification names, and transfer assets and ownership of Seller IDs, thereby thwarting Plaintiffs' ability to obtain meaningful relief. As other courts have recognized, proceedings against those who deliberately traffic in infringing merchandise are often useless if notice is given to the adverse party.

11. The balance of potential harm to Defendants of being prevented from continuing to profit from their illegal and infringing activities if a temporary restraining order is issued is far outweighed by the potential harm to Plaintiffs, their reputation, and their goodwill as a manufacturer and distributor of quality products, if such relief is not issued.

12. The public interest favors issuance of the temporary restraining order in order to protect Plaintiffs' interests and protect the public from being deceived and defrauded by the passing off of Defendants substandard goods as Plaintiffs' genuine goods.

13. Under Pennsylvania law this Court may issue a prejudgment asset restraint where Plaintiffs' complaint asserts a claim for money damages. Therefore, this Court has the authority to grant Plaintiffs' request for a prejudgment asset freeze to preserve the relief sought by Plaintiffs and preserve the Defendants' ability to at least partially satisfy a judgment.

14. Similarly, if Defendants are given notice of the Application, they are likely to destroy, move, hide or otherwise make inaccessible to Plaintiffs the records and documents relating to Defendants' illegal and infringing activities. Therefore, Plaintiffs have good cause to be granted expedited discovery.

ORDER

Based on the foregoing findings of fact and conclusions of law, Plaintiffs' Application is hereby **GRANTED** as follows (the "Order"):

I. Temporary Restraining Order

A. IT IS HEREBY ORDERED, as sufficient cause has been shown, that each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order are hereby restrained as follows:

- (1) from (a) their unauthorized and unlicensed use of Plaintiffs' Patent, distribution, marketing, advertising, offering for sale, or sale of any Infringing Products; and (b) shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner products that infringe upon at least one claim of the Plaintiff's Patent;
- (2) from secreting, concealing, destroying, altering, selling off, transferring or otherwise disposing of and/or dealing with any computer files, data, business records, documents or any other records or evidence relating to their User Accounts,¹ Merchant Storefronts² or any money, securities or other property or assets of Defendants (hereinafter collectively referred to as "Defendants' Assets");

¹ As defined in the Application, a "User Account" is, as defined in the Complaint, any and all accounts with online marketplace platform(s) Amazon.com, as well as any and all as yet undiscovered accounts with additional online marketplace platforms held by or associated with Defendants, their respective officers, employees, agents, servants and all other persons in active concert with any of them.

² As defined in the Application, a "Merchant Storefront" is any and all User Accounts through which Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them operate storefronts to manufacture, import, export, advertise, market, promote, distribute, display, offer for sale, sell and/or otherwise deal in products which are held by or associated with Defendants, their respective officers, employees, agents, servants and all persons in active concert or participation with any of them.

- (3) effecting assignments or transfers, forming new entities or associations, or creating and/or utilizing any other platform, User Account, Merchant Storefront or any other means of importation, exportation, advertising, marketing, promotion, distribution, and/or display for the purposes of circumventing or otherwise avoiding the prohibitions set forth in this Order;
- (4) each Defendant, its officers, directors, employees, agents, subsidiaries, distributors, and all persons in active concert or participation with any Defendant having notice of this Order shall immediately offering for sale the Infringing Products within metatags or other markers within website source code, from use on any web page (including as the title of any product listing), from any advertising links to other websites, from search engines' databases or cache memory, and any other form of use such terms or works which is visible to a computer user or serves to direct computer searches to Internet based e-commerce stores owned, or operated by each Defendant, including the Merchant Storefronts operating under the Seller IDs;
- (5) each Defendant shall not transfer ownership of the User Accounts or Merchant Storefronts associated with the Seller IDs;
- (6) each Defendant shall preserve copies of all computer files relating to the use of any User Accounts and/or Merchant Storefronts under the Seller IDs and shall take steps necessary to retrieve computer files relating to the use of the User Accounts and/or Merchant Storefronts under their Seller IDs that may be deleted before the entry of this Order;
- (7) upon receipt of notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to Amazon Services LLC d/b/a Amazon.com ("Amazon")

(“Third Party Service Provider(s)”), Amazon Payments, Inc. d/b/a Pay.amazon.com (“Amazon Pay”) (“Financial Institution(s)”), and their related companies and affiliates, shall immediately identify and restrain all funds, as opposed to ongoing account activity, in or which are hereafter transmitted into the accounts related to the Defendants as identified on Schedule “A” hereto, as well as all funds in or which are transmitted into (i) any other accounts of the same customer(s); (ii) any other accounts which transfer funds into the same financial institution account(s), and/or any of the other accounts subject to this Order; and (iii) any other accounts tied to or used by any of the Seller IDs identified on Schedule “A” hereto;³

(8) upon receipt of notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to the Third Party Service Provider(s) and the Financial Institution(s), shall immediately divert to a holding account for the trust of the Court all funds in or which are hereafter transmitted into all accounts related to Defendants identified in Schedule “A” hereto, and associated payment accounts, and any other accounts for the same customer(s) as well as any other accounts which transfer funds into the same financial institution account(s) as any other accounts subject to this Order;

(9) The Third Party Service Provider(s) and Financial Institution(s) shall further, within five (5) business days of receiving this Order, provide Plaintiffs’ counsel with all data that details (i) an accounting of the total funds restrained and identifies the financial account(s) which the restrained funds are related to, and (ii) the account transactions

³ This Order contemplates that discovery may reveal that Defendants may have other user accounts operated by other Third Party Service Providers and Financial Institutions and that the additionally discovery Third Party Service Providers and Financial Institutions, once identified and provided with notice, shall also be subject to the discovery, restraints and injunctions set forth in this Order.

related to all funds transmitted into financial account(s) which have been restrained. Such restraining of the funds and the disclosure of the related financial institution account information shall be made without notice to the account holders, until after those accounts are restrained. No funds restrained by this Order shall be transferred or surrendered by any Third Party Service Provider or Financial Institution for any purpose (other than pursuant to a chargeback made pursuant to that Third Party Service Provider or Financial Institution's security interest in the funds) without express authorization of this Court;

(10) Upon Plaintiffs' request, any Internet marketplace who is provided with notice of this Order, including but not limited to the Third Party Service Provider(s) and Financial Institution(s), shall immediately cease fulfillment of and sequester Defendants' inventory assets corresponding to the Seller IDs identified on Schedule "A" hereto in its inventory, possession, custody, or control, and hold such goods in trust for the Court during pendency of this action;

(11) this Order shall apply to the Seller IDs, associated Accounts and Merchant Storefronts, and any other seller identification names, Accounts or Merchant Storefronts, Third Party Service Provider or Financial Institution accounts which are being used by Defendants for the purpose of infringing on at least one claim of the Plaintiffs' Patent;

(12) Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms, including but not limited to the Third Party Service Provider(s) and the Financial Institution(s), subject to this Order may petition the Court to modify the asset restraint set out in this Order; and

(13) this Order shall remain in effect until the date for the hearing to show cause why a preliminary injunction should not be issued as set forth below, or until such further dates as set by the Court or stipulated by the parties.

B. IT IS HEREBY ORDERED, as sufficient cause has been shown, that upon Plaintiffs' request, any Internet marketplace who is provided with notice of this Order, including but not limited to the Third Party Service Providers and Financial Institutions, is hereby restrained and enjoined from engaging in any of the following acts or omissions pending the hearing and determination of Plaintiffs' Application for a preliminary injunction, or until further order of the Court:

(1) secreting, concealing, transferring, disposing of, withdrawing, encumbering or paying Defendants' Assets from or to financial accounts associated with or utilized by any Defendant or any Defendant's User Accounts or Merchant Storefront(s) (whether said account is located in the U.S. or abroad) ("Defendants' Financial Accounts") until further ordered by this Court; and

(2) within (5) days after receiving notice of this Order, providing services to Defendants, Defendants' User Accounts and Defendants' Merchant Storefronts, including, without limitation, continued operation of Defendants' User Accounts and Merchant Storefronts, and any other listings linked to the same sellers or linked to any other alias seller identification names being used and/or controlled by Defendants.

II. Order to Show Cause Why a Preliminary Injunction Should Not Issue and Service of Order

A. Defendants are hereby ORDERED to show cause before this Court in the United States District Court for the Western District of Pennsylvania, the U.S. Courthouse, 700 Grant Street,

Pittsburgh, Pennsylvania in Courtroom No. ____ on the ____ day of _____, 2019, at _____ .m. or at such other time that this Court deems appropriate, why a preliminary injunction, pursuant to FRCP 65(a), should not issue. **Defendants are on notice that failure to appear at the hearing may result in the imposition of a preliminary injunction against them.**

B. Opposing papers, if any, shall be filed electronically with the Court and served on Plaintiffs' counsel by delivering copies thereof to the office of Ference & Associates LLC at 409 Broad Street, Pittsburgh, Pennsylvania 15143 before _____, 2019. Plaintiffs shall file any Reply papers on or before _____, 2019.

C. After Plaintiffs' counsel has received confirmation from the Third Party Service Providers and Financial Institutions or otherwise, regarding the restraint of funds directed herein, Plaintiffs shall serve copies of the Complaint, the Application, this Order, and any Discovery on each Defendant via their corresponding email/online contact form provided on the Internet based e-commerce stores operating under the respective Seller IDs, or by providing a copy of this order by e-mail to the marketplace platform, which in turn notifies each Defendant of the Order, or by other means reasonably calculated to give notice which is permitted by the Court. In addition, Plaintiffs shall post copies of the Complaint, Application, this Order, any Discovery, and all other pleadings and documents filed in this action on a website designated by Plaintiffs,⁴ and shall provide the website address to Defendants via e-mail/online contact form, and such notice so given shall be deemed good and sufficient service thereof. Plaintiffs shall continue to provide notice of these proceedings and copies of the documents on file in this matter to Defendants by

⁴ Rule 65 has been interpreted to require that a party have notice of the motion and hearing; perfecting service on a defendant is not a prerequisite to the entry of a preliminary injunction order. *Pate v. Gov't of the Virgin Islands*, 2015 WL 1937701 n.9 (VI Sup. Ct. April 17, 2015); *Corrigan Dispatch Co. v. Casa Guzman, S.A.*, 569 F.2d 300, 302 (5th Cir. 1978).

regularly updating the website designated by Plaintiffs or by other means reasonably calculated to give notice which is permitted by the Court.

III. Order Authorizing Expedited Discovery

A. IT IS FURTHER ORDERED, as sufficient cause has been shown, that:

(1) Plaintiffs may propound interrogatories pursuant to Rules 26 and 33 of the Federal Rules of Civil Procedure, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall provide written responses under oath to such interrogatories within fourteen (14) days of service to Plaintiffs' counsel.

(2) Plaintiffs may serve requests for the production of documents pursuant to FRCP 26 and 34, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall produce all documents responsive to such requests within fourteen (14) days of service to Plaintiffs' counsel.

(3) Plaintiffs may serve requests for admissions pursuant to FRCP 26 and 36, and Defendants, their respective officers, employees, agents, servants and attorneys, and all persons in active concert or participation with any of them, who receive actual notice of this Order, shall provide written responses under oath to such requests within fourteen (14) days of service to Plaintiffs' counsel.

B. IT IS FURTHER ORDERED, as sufficient cause has been shown, that within fourteen (14) days of receiving actual notice of this Order, Defendants and all financial institutions, payment processors, banks, escrow services, money transmitters, or marketplace platforms,

including but not limited to the Third Party Service Provider(s) and the Financial Institution(s), shall provide to Plaintiffs' counsel all documents and records in their possession, custody or control (whether located in the U.S. or abroad) relating to Defendants' User Accounts and Defendants' Merchant Storefronts, including, but not limited to, documents and records relating to:

- (1) any and all User Accounts and Defendants' Merchant Storefronts and account details, including, without limitation, identifying information and account numbers for any and all User Accounts and Defendants' Merchant Storefronts that Defendants have ever had and/or currently maintain with the respective Third Party Service Provider;
- (2) the identities, location and contact information, including any and all e-mail addresses of Defendants that were not previously provided;
- (3) the Defendants' methods of payment, methods for accepting payment and any and all financial information, including, but not limited to, information associated with Defendants' User Accounts and Defendants' Merchant Storefronts, a full accounting of Defendants' sales history and listing history under such accounts and Defendants' Financial Accounts associated with Defendants' User Accounts and Defendants' Merchant Storefronts; and
- (4) Defendants' unauthorized and unlicensed use of Plaintiffs' Patent.

V. Security Bond

IT IS FURTHER ORDERED that Plaintiffs shall place security (corporate surety bond, cash, certified check, or attorney's check) in the amount of \$ _____ Dollars (_____) with the Court, which amount is determined adequate for the payment

of any damages any person may be entitled to recover as a result of an improper or wrongful restraint ordered hereunder.

VI. Summons

IT IS FURTHER ORDERED that the Clerk of the Court shall issue a single original summons in the name of “AHUI and all other Defendants identified in the Complaint” that will apply to all Defendants.

SO ORDERED.

SIGNED this ____ day of December, 2019, at _____ .m.
Pittsburgh, Pennsylvania

MARK R. HORNAK
CHIEF UNITED STATES DISTRICT JUDGE

Schedule “A”
Defendants With Store Name and Seller ID

Def. No.	Defendant/ Amazon Store Name	Amazon Seller ID	Amazon ASIN
1	Ahui	A3U2CPCPJ050N8	B07TX92ZLNQ
2	Ailivehome	A2Q37ZZMRPWEUV	B07JH3TYV8
3	All Prime LLC	A1NRBK5OKTLIFR	B07XLP62VR
4	Allmall888	A25OCV4VBOQUKF	B07RJWXCLF
5	ANVS Tech	A8LT6FXIOGDFI	B07ML5G2WQ
6	AogeUS	A3MWRF119YSYCT	B07VWVJZZT
7	Artker	A1LTFO55JILCQ2	B07XMLYNKX
8	Atta Boy	A2WOOIJCDNZIVD	B07QKQ6P6T
9	Augama	A2A5F1J2BTE5O5	B07S4D657W
10	Auter USA	A16DKW394FVK2S	B07X7RHPMJ
11	Autozity	ATVDEQ3O2D7PY	B07ZHDXT5K
12	Axiaoxiao	A3SRZL3PDSSGPU	B07V4273FX
13	Aya Chic	AV58HO4Y4YG5	B07LCJJGG9
14	Ayebeau	A2GOBGX3PC0YNJ	B07TS4GTND
15	Babaer	A2X8047YTWB3QG	B07XX9KQ86
16	Bettersounds	ARCWMCB8R9G28	B07RNP5Q64
17	Bibolin	A1596LJ1S5W3TG	B07LH5JDX4
18	Big Desert	A2CQ3M4XU1WT8J	B07PDL8267
19	Boafig	A33GCS1BVSIGL2	B07PXR9TH4
20	Botaniqueessentials	A1HG09WM1GIS7A	B07QK33ZZN
21	BRHHO	A1PBBFMFM0EZ72	B07S4FY7HM

Def. No.	Defendant/ Amazon Store Name	Amazon Seller ID	Amazon ASIN
22	BringerPet	A2R8LQFQXAS02Q	B07WK75VB8
23	Broshooo	A3DZSMYMI1CGXN	B07PVKB6SQ
24	BUOCEANS-SKY	A1ON3DR30UNJHY	B07XNYDDC1
25	BUYBST	A1ZLNBDINT4IZU	B07Q5G1WZ2
26	Bzonsmart Direct	AHONMT16XCO00	B07PLQK56B
27	Chaomike	A1MUD9GV35XJN5	B07QYGMGZ5
28	CheerMaker	A1FJAUSPRZ91OI	B07QGS8GZQ
29	Cyprapid	A2H9A2I79SE359	B07QPLPMV6
30	Cypropid Direct	A2L3N86K9OOJ00	B07Q2S72S1
31	Dawginme	A6MFQINS9TKP3	B07TNF9D8N
32	DIFFLIFE Inc	A14AEQBL1VFTWB	B07P4199GW
33	Doubletrain	A2BZJ01X7OFC	B07QY73XV3
34	DR Bucks	A331COZNMVERF	B07V5PYY7R
35	Dreamvasion	A28KT5WWRGE7GR	B07QLQS6GF
36	Dubybloom	A2ZULWH0LC4SA6	B07TP56PM9
37	DXH2019	A3M8MU0XHHRI3U	B07YXS75QK
38	Earthly Hand	A3HKUNZ7QQ4AD8	B07PN324L3
39	Elyvate	A1IPX60SQL9IEQ	B07M76PXTD
40	Emgoods	A2LPDVL9EG7Y8D	B07SKG3D13
41	EMITEC	A285W476ZH7S3L	B07MKGZCDS
42	Engerwall	A13Z6ZJ65GO471	B07QLRYY61
43	EVENTS	A3NPMCN3ASH8M4	B07V7B7LGR
44	Everyday Joy	A32042ABW1EBA8	B07NWNFYFVM
45	Fairwin-Direct	A1GBD5L13AYNED	B081JFX4C6

Def. No.	Defendant/ Amazon Store Name	Amazon Seller ID	Amazon ASIN
46	Fanslong	A34N1Y0D6522AJ	B07P66FHST
47	FFHPET	A2L3DPHTO3K7G0	B07M633DGX
48	FG [FamilyGroup]	AH6POBJ04HF6W	B07L2GNRNT
49	FlyingStork	A2EJVGYMF7UK0J	B07V4GHY2P
50	FULNEW	A2VNK3XIPF7PLU	B07MRJ2RCR
51	FunCo	AECMRGNZ74088	B07MF1TNSW
52	Gardencolo	A24TIWOB6Y52IL	B07QBLRLSC
53	Geluck&Mohary Global US Online	A12SEMS6M015RN	B07L8X9F6T
54	Grasp It	A2IO9PWGSATNPH	B07YYZ8JYD B07RN4QCR9
55	Hanheng	A2UPRT91JV93PY	B07R5LLFH2
56	HAO MA LTD	A3EF4QA3MVKSFL	B07PJGZMGM
57	HAPPY MARIE	A20ZIABWRFKMA9	B07QRGJXGW
58	Heacra	AGVE3N6Y5CYPB	B07NBDLMM2
59	HETOO	A3SCDVBQWCDYIU	B07QYDVFXL B07TCGJSSP
60	Hinrylife	A1KLHJR9WIMQXT	B07PPD7D7P
61	Holdoor	A1BQ1S3TWD05A7	B07TVSNSNG
62	Honestptner Direct	A3740H0TCLDQY9	B07SJZ2YDT
63	Hongsound	A3PTAN2I58BT4Z	B07QYKJ8VZ
64	HULUN	A2XBW8WTZGI7TK	B07M78ZKTV
65	I-pure items	A2IKTKEPMEW9NQ	B07S9YBB4S
66	Itemsandgoods323	A113GJ49XJ0SIC	B07X2D5RHB
67	JALLAB	A3FQ5H4F6HMW2Y	B07MJQ2T34
68	JerJen Business Solutions	A2PQ2V6AX51B8D	B07MQJHPPL

Def. No.	Defendant/ Amazon Store Name	Amazon Seller ID	Amazon ASIN
69	JiaJiaLove	AGDDEEE9Q9FWQ	B07HHYVJZJ
70	Jiasber	A15C2T7YZ8QIDS	B07ZYHJ3M9
71	JINGSHENG TEC	AB11VYRIO8TE	B07TXNKXTL
72	Jpettie	A2YGY78UR8AVK6	B07MF2TKR2
73	Juhang	A2TY3CN5B4MKGE	B07M8PMY4V
74	Ka June	A6FLM7VSPKANY	B07RC71CRL
75	KAMNIA	A34XEIJ0FYM5OX	B07ZG2G5WV
76	KELAD	A2MZV8VHYSK1OY	B07XWP28FF
77	KEWANG	A74N1N376UNJB	B07QL71MGN
78	Kimcon	AO9O9WLJQ0VVO	B07SPKJZP4
79	KJ-bunny-US	ALB5NY1WH6KJV	B07QNZNC4N
80	KNNSRE	AAA6O4A42RACT	B07W3BK77P
81	Kutrer	A2FT22UGQSB DG3	B07QB3SSBT
82	LAVYU SHOP	A1HKBCWJ4EX7YI	B07YTS1BVR
83	LEOHOME Direct	ASM1G21RKWQVG	B07TDPTLD8
84	LEVETT STORE	A1YQCLYW752GQI	B07JM387ZJ
85	Lingweida2018	A1BED976EGRA99	B07Y5ZXTRF
86	Linktor	A1ZVD45MDQVSMM	B07RHSZJSV
87	LISTOS'	A6HG3VO4UEWN9	B07TZM7B34
88	LIZFZFLI	A236T2XB36SL7	B07TQSWJ31
89	LMP-PRO	A1IO52YR61IZR9	B07QKFXQ7T
90	LOMEVE	A352GYI24QCF3Z	B07STV2VTS
91	Lou Yan	A2YRJYJTFTGKUM	B07X41WNT9
92	Lovac	A3KWOYXC59CG8P	B07MH4N7WG

Def. No.	Defendant/ Amazon Store Name	Amazon Seller ID	Amazon ASIN
93	Magnoloran	A2TJM3J6VRTRAR	B07PN2MQKD
94	Manfore	A3U8N0MA47KIZ7	B07QWR6VDM
95	Mansgoods	A3LGEKSF23N94S	B07VJ5JDMY
96	Marcek	AWDL348ZQ8N4Q	B07RB6R8Y5
97	Mini US	A274PS7EH4STWC	B07R8BSLXH
98	MIRYUM	A2D0P7B0LUIPOK	B07M66D9D9
99	Mofei	A2PQ8GKZWMX6XO	B07M888BGT
100	Moonia No.1 Store	A1NT1LLAH3SCVB	B07QR1V93V
101	Mosbug-Store	AFVD5UBZ7I22I	B07HH3N3L6
102	MOZOOSON DIRECT	A24C9RK7XFZ5LV	B07PQRWYPG
103	MS hong	A1MQ17GQ2699WZ	B07QQBSKZJ
104	Mulan&PH Factory	A2SU0GAVJ9OA9J	B07Y8GN6FZ
105	NEWA TRADING	A10I7J9V9M8UOX	B07R1JDQ7Q
106	NiceKrud	A14NSFVD7ZKOLB	B07SZH3KL3
107	Niuworld	A3DOF2HOZYWW1W	B07QYGC471
108	OKA Direct	A1ZRM0A1AY8AC2	B07XC7QZSL
109	Okistore	A2FKVCM8E90CN7	B07S8QV59T
110	Olrom	AYYYYCQXUD1A4U	B07QPCHLJB
111	OUTUNG	AS7QBW9ESCL9F	B07P14HWQR
112	PAHOO LLC	A1PBK72SX0L8IP	B07QXQHMLF
113	PauliaTT	A3K8K2UU71WIT9	B07QX1XL8R
114	PG.Kinwang	A2AJ6IHT4WO3W7	B07MMBHGWI
115	Pihappy	A1PV795YHMBJGI	B07Q25CLY9
116	PINAOL	A1JK4GXUMS499Q	B07RWM1SD8

Def. No.	Defendant/ Amazon Store Name	Amazon Seller ID	Amazon ASIN
117	Popiy	A1Q9OSIFTKPHWR	B07WMNVQHQ
118	Positive Vibes Express	AGEUY7G2B7SJ8	B07MW7HLNB
119	Pounce n Play Shop	A2ZULWH0LC4SA6	B07SD1T9C5
120	PrestigeWD	A1IWUYFQ8VPBJA	B07QMC1D5Z
121	Price-Pop	A2W7S7E1K9VJ4Q	B07QCJJS7B
122	PTREWOD	ABNG47SIUQFAZ	B07QLJX436
123	Rikounan	A2VDQPJKSUWURR	B07T2468K2
124	Roce Today	A2HDQ4UQ1J0OF5	B07N76GPHQ
125	Rolkstone	A3QQ5K8GTSXFUD	B07QD5BPW7
126	Shaks goods	A27ZPTUC3E5HSF	B07QZX6C1T
127	Shandongxiaogouchongwuyongpinyouxiangongsi	A1G9JETKBXHNNN	B07TLTB8C5
128	SHINCO	A7BAKTUTEHM2O	B07R1HSP9F
129	SIRAY US	A3FKKDXF1C4S2J	B07ZWWZPWH
130	SmileToSell	AZ132CXWZM3HD	B07X2D5RHB
131	ST-Transfer	A2N3YB5UINFLFN	B07QDXK6PJ
132	Tainni	A2E59C3851JHM0	B07P6M37JT
133	Telvo Zan	A2RC7Q07GD3RH	B07V9L79TM
134	TEVOLT	A299ZWGKWWZRGV	B07Q8FK62L
135	Timall	A3KI1U01FJ1NRZ	B07PM1W9YR
136	Timeless Ecommerce LLC	A3DJS3V27B8IVH	B07MNB9WXV
137	Turuistore	A27R4FX0T9XSJO	B07TG2BMR1
138	Typscoldt	A1MCEOOSW27MAR	B07X3ZRDHC
139	UKSIDE	A10KV9KRQ12CA7	B07R24KYG7
140	USDev	AUXBS4D5MP7HI	B07Q4C52MB

Def. No.	Defendant/ Amazon Store Name	Amazon Seller ID	Amazon ASIN
141	Vndaxau	A29LGGMEB2YK CZ	B07PHFM5XK
142	WiseDare	A333C8NL57A6TA	B07PPHP8GK
143	Wisedom	A2PWVG57ETOCZH	B07JKSV17D B07JKLFMZX
144	Wittystore	A26GPK5EBKIN24	B07TMB297H
145	Xuanbon	A35P6T4SL4VZQE	B07QSBWMF1
146	Yaloon	AHSAI3V6SYIB3	B07VWS6VBJ
147	Yiruichepin	A2A5VAZIS1BIUO	B07P9TFV4X
148	Yiwu Lanjie Trading Co., Ltd	A6LZWYNZ7QGCD	B07RJTXGJ3
149	Yocolostrap	A2GL7JZEGNR5TQ	B07WSMJTG9
150	YouZeus	A1CMENCU6TZLEC	B07R28DTJD
151	3rdchanceinc	A388QZ7SQ71TRM	B074MR6GX5