

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROKU INC.,)	
Plaintiff,)	
)	
v.)	Case No.: 1:22-cv-00202
)	
THE INDIVIDUALS, CORPORATIONS,)	
LIMITED LIABILITY COMPANIES,)	
PARTNERSHIPS, AND)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE A TO THE)	
COMPLAINT,)	
)	
Defendants.)	
)	
)	

DECLARATION OF CHRISTOPHER TOM

I, Christopher Tom, declare and state as follows:

1. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.
2. I am an attorney at law, duly admitted to practice before the Courts of the State of New York and the United States District Court for the Southern District of New York. I am one of the attorneys for Plaintiff ROKU INC. in this action.
3. On January 10, 2022, the Plaintiff filed this action against the entities identified on **Exhibit 1** attached hereto (collectively, the “Defaulting Defendants”), asserting, amount other things, claims against Defendants.
4. A true copy of the Complaint is attached hereto as **Exhibit 2**.
5. Contemporaneous with the filing of the Complaint, Plaintiff also filed an ex parte application against Defendants for entry of a temporary restraining order, among other relief (the “Application”).

6. On January 20, 2022, the Court granted the Application and entered the Temporary Restraining Order (“TRO”) [See Doc. No. 22]. A true copy of the TRO is attached as **Exhibit 3**.

7. Pursuant to the TRO, the Court authorized Plaintiff to serve, among other things, the Summons and Complaint by: (i) electronically publishing a link to the Summons and Complaint on a website made available to the defendants; and (ii) by e-mailing a copy of the Summons and Complaint to any e-mail addresses that Plaintiff was able to obtain for the defendants, shall constitute proper service pursuant to Fed. R. Civ. P. 4(f)(3). See TRO, ¶ 5.

8. On January 31, 2022, the Clerk of this Court issued a Summons directing defendants to serve upon Plaintiff’s counsel an Answer to the Complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure (“Rule 12 Motion”) within twenty-one (21) days after service of the Summons, and to also file its answer or Rule 12 Motion with the Court. See Doc. No. 94.

9. On January 31, 2022, pursuant to the methods of alternative service authorized by the TRO, all Defaulting Defendants were duly served with, among other things, the Summons and Complaint in this matter as reflected on the Proof of Service filed with the Court on June 13, 2022. See Doc. No. 94.

10. A true copy of the Proof of Service filed with this Court is attached as **Exhibit 4**.

11. As a result, Defaulting Defendants should have filed their respective Answers or Rule 12 Motions on or before February 21, 2022.

12. More specifically, on January 31, I emailed the Summons, Complaint, TRO, and Order Adjourning Preliminary Injunction Hearing and Extending Defendants’ Time to Oppose Plaintiff’s Request for Preliminary Injunction to Defendants via the email addresses identified during the investigations of the claims and provided by the third-party platforms for which the Defendants maintain accounts –Aliexpress, Amazon, DHgate, eBay, Joom, and ContextLogic (Wish) (the “Marketplace Accounts”). The email also included a link to a website (<http://roku-cases.com/case-22-cv-00202.html>) to which the Defendants were provided access upon service of the summons and notified that all relevant documents in the case, including the TRO, would be published. Attached as **Exhibit 5** hereto is a true and correct copy of the emails to Defendants. Attached as **Exhibit 6** hereto is a true and correct copy of the Service Website.

13. Since service of the Summons, Complaint, and TRO, Plaintiff’s counsel has also corresponded with representatives of the Marketplace Accounts. These third-party Marketplace Accounts have specifically identified and restricted access to the Defendants’ accounts (the “Defendant Internet Stores”).

14. Since and pursuant to entry of the TRO, the Aliexpress, Amazon, DHgate, eBay, Joom, and Wish accounts associated with the Defendant Internet Stores have been restricted.

15. Despite multiple methods of service, however, to date, the Defaulting Defendants have neither served upon me or anyone else acting on Plaintiff’s behalf, nor filed with the Court, an Answer, a Rule 12 Motion, or any other response to the Complaint on or before February 21, 2022.

16. Notably, certain defendants are not subject to default and are not included within the Defaulting Defendants because they have been voluntarily dismissed [*see* Doc. Nos. 26, 58, 64, 69, 73, 79, 83, 84, 88, 90, 92, 95, and 98], have entered into a settlement and are in the process of being voluntarily dismissed, or have answered the complaint. These non-defaulting defendants are listed below (identified by the name and number referenced on the Schedule A to the Complaint):

Doe No.	Seller Names	Defendant Online Marketplace
1.	akaddy	https://www.amazon.co.uk/sp?seller=AZMZ38E5CSYOF https://www.amazon.es/sp?seller=AZMZ38E5CSYOF
2.	Auriver	https://www.amazon.co.uk/sp?seller=A1MS8VLVWO1JTO
3.	Auteey	https://www.amazon.com/sp?seller=A2H6A0PK2KXGO2
4.	Buy & Delight	https://www.amazon.com/sp?seller=A36HDWD6VFTIW4
5.	Carbonline	https://www.amazon.com/sp?seller=A1P6UUT8SQA5IV
6.	CHUNGHOP STORE	https://www.amazon.com/sp?seller=A31V65U0LFCASF
7.	CØLIPSØ	https://www.amazon.com/sp?seller=A1HBDXH34Q3BT7
8.	EleLink Shop	https://www.amazon.co.uk/sp?seller=A2VDAMJ60YOTRZ
9.	Feitian shop	https://www.amazon.com/sp?seller=A2BK5CBS2FY994
10.	Flying’s Shop	https://www.amazon.com/sp?seller=A2NU4BCWRI3E3S
12.	Hojay Store	https://www.amazon.com/sp?seller=A3PPY64DX3IRCS
14.	JIANSHE	https://www.amazon.co.uk/sp?seller=A1UC9L6K2VZ1RH

15.	JEM&JULES	https://www.amazon.com/s?me=A3KJA3ZC4P8OAR
17.	Lazmin112	https://www.amazon.co.uk/sp?seller=AKZ77D6L5UUJM https://www.amazon.es/sp?seller=AKZ77D6L5UUJM
18.	littlefishlittlecat	https://www.amazon.com/sp?seller=A3FLNV2TDV00UC
19.	luokeli	https://www.amazon.com/sp?seller=A1HXIVM39MVE9S
20.	Melody-Store	https://www.amazon.com/sp?seller=AFDYL8IJUU1IT
21.	Outlet-Express Store	https://www.amazon.com/sp?seller=A3C72VOFBASADK
22.	Paialu	https://www.amazon.com/sp?seller=A2Y74PRXV2P6SN
23.	PARTS XPRESS STORE	https://www.amazon.com/sp?seller=A18943SGD7X6KS
24.	Parts-Outlet	https://www.amazon.com/sp?seller=A29JKI1RMX1A0E
25.	Pottnar Store	https://www.amazon.com/sp?seller=A3UT223SO7JDA
26.	Rankao-EU	https://www.amazon.co.uk/sp?seller=a16j79djha579
27.	Rimous	https://www.amazon.com/sp?seller=A3HD80JAJMOZ8U
28.	SB Components Ltd	https://www.amazon.co.uk/sp?seller=A2717MKXZVZ1ZW
29.	SofaBaton	https://www.amazon.com/sp?seller=A1N3NJ1ATIMDAK
30.	Sourcing Remote	https://www.amazon.com/sp?seller=A171VDD0QICR2T
31.	USonline911	https://www.amazon.com/sp?seller=A2Y948N6N5PM23
32.	Value Foremost	https://www.amazon.com/sp?seller=A34ME3ISW4VTC5
33.	Vtinv	https://www.amazon.com/sp?seller=A3J8JA83NK0A0X
35.	Xinyu UK	https://www.amazon.es/sp?seller=A39V3CUVEQP3GO https://www.amazon.co.uk/sp?seller=A39V3CUVEQP3GO
36.	xuuyuu	https://www.amazon.ca/sp?seller=A3UOH6UFKYX3BS
37.	Yaotieci SHOP	https://www.amazon.com/sp?seller=A2Q4LXGRPVMHZRA
39.	15983070819@163.com	https://www.wish.com/merchant/590d869a2da1ba196e0ad586
40.	AgileDragon	https://www.wish.com/merchant/547f0ba5653d51314ac44285
41.	amargaret	https://www.wish.com/merchant/5831c4f7ef56284f7534b824
42.	ann-yanguang88	https://www.wish.com/merchant/578b7bad095367532883d5d6
44.	baihe	https://www.wish.com/merchant/57860a5294bcf1439be28066
45.	BeadDreamShop	https://www.wish.com/merchant/58af02739dc860521d2eb68d
46.	blinbling001	https://www.wish.com/merchant/578e386e6a303a0eec755c70
47.	Caeiore	https://www.wish.com/merchant/5832fd9c42abfb1b8455b5e4

48.	CartoonsDibujos	https://www.wish.com/merchant/57dba6428bc4e8109ad5ca11
49.	chanvincy	https://www.wish.com/merchant/57149f2b853cde590cd98882
50.	chenliliang	https://www.wish.com/merchant/5931494f20e1bf316477f32c
51.	cherish	https://www.wish.com/merchant/55bad358ec31eb41e4cf7a2d
52.	CONTROL INN	https://www.wish.com/merchant/5ecf4675fdf5965bbcd3bf4f
53.	Crazy Gai	https://www.wish.com/merchant/582af230ae08867481e38edd
54.	Cynthia Yoder	https://www.wish.com/merchant/58af04c315241652046542a9
55.	dongfangfang	https://www.wish.com/merchant/584233ed1341994f72a70639
57.	EveryDayLifeStore	https://www.wish.com/merchant/565415b43608bc201c65acfc
58.	f-cloths	https://www.wish.com/merchant/578e2eba2343010efaa2610b
59.	Francisco Lima	https://www.wish.com/merchant/5859f51ed800734d59a0392c
60.	fuyangfamen	https://www.wish.com/merchant/56e3d8ee8582fb5e366be8d3
61.	gogofast	https://www.wish.com/merchant/55166b0574c021216213583d
62.	graduator	https://www.wish.com/merchant/5645970eda9e8612a5403377
63.	heibaipai	https://www.wish.com/merchant/5795cb70cb38dd21922fe825
64.	herofun	https://www.wish.com/merchant/56fcc7067415f96ea3a29a76
65.	hexueqing0926	https://www.wish.com/merchant/589983fa76209a4ffb3eac57
66.	hi_lee	https://www.wish.com/merchant/57838f17f1ab1f1131beacf6
67.	highest&coolman	https://www.wish.com/merchant/58501a992bf2c96a06a99de6
68.	hmx881800	https://www.wish.com/merchant/584b9a54159145262176185b
69.	houguofang	https://www.wish.com/merchant/58a7fbd1a7a80b6f64ec95f9
71.	huangwenyuan1	https://www.wish.com/merchant/5931110ca126a33883978c7a
72.	jdjhru5478	https://www.wish.com/merchant/59047ec61fb1dc1d00e138d1
73.	jiayunpeng12	https://www.wish.com/merchant/584188cc8108912edcde366a
75.	jocelyn07	https://www.wish.com/merchant/57de433ecc8b99102168403c
76.	KamShun Fashion	https://www.wish.com/merchant/5846cc7acd7c006932f24fbb
78.	keyofsuccess2016	https://www.wish.com/merchant/57b315d226c88d18eee94a0c
80.	li yunyun	https://www.wish.com/merchant/58da0b45b7bb136efa0b8269
81.	lianghaiyan32	https://www.wish.com/merchant/5844fc8e5291914d4adeaba9
82.	lifefit	https://www.wish.com/merchant/565955e58f5f027e130604e5

83.	lili zhang	https://www.wish.com/merchant/584c17eb81089121f88b8aa3
84.	liujinyang	https://www.wish.com/merchant/58dd14026067365f5d1dec08
85.	Longzhifanny	https://www.wish.com/merchant/5978471feea5c55998b8beea
87.	lujinling	https://www.wish.com/merchant/58f02c9a441fb82c7dd0c6e6
88.	mazaolin	https://www.wish.com/merchant/58a9709396f1bb6f151155a6
90.	MEFCreationsBoutique	https://www.wish.com/merchant/58b0219ef7f54a50a10aa5f2
91.	Merci smith	https://www.wish.com/merchant/582f229218183f424ca09af7
92.	Ming hing bully clothing	https://www.wish.com/merchant/5899c3197c0f924fed454c0e
94.	moshanhua	https://www.wish.com/merchant/58e8bf86259689339ae07e80
96.	nice2seu	https://www.wish.com/merchant/56f501667b19c65ed788a3fe
98.	orchidfarm	https://www.wish.com/merchant/571488554f5e5759357da868
99.	owes	https://www.wish.com/merchant/5656793b86004b08b2d0f765
100.	paomo	https://www.wish.com/merchant/57875849090d400af5f1e0bf
102.	Principles	https://www.wish.com/merchant/57ecc9068bde84103e1f9cf4
104.	rocknfemme	https://www.wish.com/merchant/5851e60479b45e6aeaf9dfb9
105.	runandianli	https://www.wish.com/merchant/56a70cc41b8c5a3f1b1b8034
107.	smart4u	https://www.wish.com/merchant/5645763c70337932d501afd2
108.	Smilebreath	https://www.wish.com/merchant/57d64383bc23d5101cd76c30
109.	songguifang	https://www.wish.com/merchant/58df907d7f36b352ca3e6394
110.	SOPHWI-LP	https://www.wish.com/merchant/584c1b4b334bb04d51503d88
111.	sunny	https://www.wish.com/merchant/584534057f6c0d4ca53569ae
112.	thumbup	https://www.wish.com/merchant/56fb6b2dc1bed17394d51c21
113.	tiancong	https://www.wish.com/merchant/5840f04134599a698571b66b
114.	timesq	https://www.wish.com/merchant/56efa671a9f07f5860ee6311
115.	wanguoqin	https://www.wish.com/merchant/5848e583d23c144d2c3b8781
116.	wangjing120803	https://www.wish.com/merchant/589b0e4bbe0fe74ff78f76a9
117.	wanglixia	https://www.wish.com/merchant/584139e6e88f6367d6ddc795
118.	Wasiteasy	https://www.wish.com/merchant/57e0ef2f3a02477561528254
119.	WJANU	https://www.wish.com/merchant/583c49150884751b85e98cef
120.	wudile	https://www.wish.com/merchant/57a2e9ebb2ea3e659e379098

121.	wumei150329	https://www.wish.com/merchant/584a46fba55ed20948d5d9f9
122.	xiaoxiaodedian	https://www.wish.com/merchant/5837f1032f5e53046e9cdeb2
123.	xindong	https://www.wish.com/merchant/57aec069d25a4018b733a48b
124.	xinglongzhuanqian	https://www.wish.com/merchant/582ec9368108914211fa2079
125.	xingstars	https://www.wish.com/merchant/570367598b7f1058f43e3363
128.	yangfanlsy	https://www.wish.com/merchant/5899bf818333d24fe970ff84
130.	zhengzhi	https://www.wish.com/merchant/5784a8800d06001a7f062dfd

17. Our investigation into the infringing activities of the Defaulting Defendants, including attempting to identify the registrant of each associated domain name and its contact information. Our investigation confirmed that the Defaulting Defendants are mostly domiciled in China. As such, I am informed and believe that the Defaulting Defendants are not infants, in the military, and/or incompetent individuals.

18. Since the Defaulting Defendants have failed to Answer or otherwise appear in this action, and the time for Defaulting Defendants to Answer or otherwise appear in this action has expired, Defaulting Defendants are in default.

19. Default Judgment is appropriate against the Defaulting Defendants, who are each individually responsible and liable for the infringing activities that have occurred in this action. Indeed, each Defaulting Defendant is subject to statutory damages, as more particularly described in the Memorandum at Law, submitted herewith.

20. Moreover, each of the Defaulting Defendants is subject to permanent injunctive relief, as also more particularly described in the Memorandum of Law submitted herewith.

21. None of the relief sought against each Defaulting Defendant requires adjudication of any other person or entity's rights or obligations.

22. On July 15, 2022, the Clerk of the Court filed a Clerk's Certificate of Default in this matter, a copy of which is attached as **Exhibit 7**.

23. Thus, it is respectfully requested that the Court enter Final Judgment of Default, in the form submitted herewith, against the Defaulting Defendants.

24. The legal bases for entry of Final Judgment of Default, including the basis for subject matter jurisdiction and damages are further set forth in the Memorandum of Law submitted herewith, which is incorporated herein by reference.

I declare under penalty of perjury that the foregoing is true and correct. Executed on July 25, 2022 in Cranford, New Jersey.

/s/ Christopher Tom
Christopher Tom

Exhibit 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROKU INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:22-cv-00202 (PGG)
)	
THE INDIVIDUALS, CORPORATIONS, LIMITED)	
LIABILITY COMPANIES, PARTNERSHIPS, AND)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE A HERETO,)	
)	
Defendants.)	
)	
)	
)	
)	
)	
)	
)	

SCHEDULE A TO COMPLAINT – PROVISIONALLY FILE UNDER SEAL

Doe No.	Defendant Seller	Defendant Online Marketplace
1.	akaddy	https://www.amazon.co.uk/sp?seller=AZMZ38E5CSYOF https://www.amazon.es/sp?seller=AZMZ38E5CSYOF
2.	Auriver	https://www.amazon.co.uk/sp?seller=A1MS8VLVWO1JTO
3.	Auteey	https://www.amazon.com/sp?seller=A2H6A0PK2KXGO2
4.	Buy & Delight	https://www.amazon.com/sp?seller=A36HDDWD6VFTIW4
5.	Carbonline	https://www.amazon.com/sp?seller=A1P6UUT8SQA5IV
6.	CHUNGHOP STORE	https://www.amazon.com/sp?seller=A31V65U0LFCASF
7.	CØLIPSØ	https://www.amazon.com/sp?seller=A1HBDXH34Q3BT7
8.	EleLink Shop	https://www.amazon.co.uk/sp?seller=A2VDAMJ60YOTRZ
9.	Feitian shop	https://www.amazon.com/sp?seller=A2BK5CBS2FY994
10.	Flying's Shop	https://www.amazon.com/sp?seller=A2NU4BCWRI3E3S
11.	Gaudi	https://www.amazon.com/sp?seller=A3SXZVKR9JCQKK
12.	Hojay Store	https://www.amazon.com/sp?seller=A3PPY64DX3IRCS
13.	HzgangDirect	https://www.amazon.com/sp?seller=A3E8ZAQLE3WB1O
14.	JIANSHE	https://www.amazon.co.uk/sp?seller=A1UC9L6K2VZ1RH
15.	JEM&JULES	https://www.amazon.com/s?me=A3KJA3ZC4P8OAR
16.	JustFine	https://www.amazon.com/sp?seller=A23SYZU9KXD386
17.	Lazmin112	https://www.amazon.co.uk/sp?seller=AKZ77D6L5UUJM https://www.amazon.es/sp?seller=AKZ77D6L5UUJM
18.	littlefishlittlecat	https://www.amazon.com/sp?seller=A3FLNV2TDV00UC

Doe No.	Defendant Seller	Defendant Online Marketplace
19.	luokeli	https://www.amazon.com/sp?seller=A1HXIVM39MVE9S
20.	Melody-Store	https://www.amazon.com/sp?seller=AFDYL8IJUU1IT
21.	Outlet-Express Store	https://www.amazon.com/sp?seller=A3C72VOFBASADK
22.	paialu	https://www.amazon.com/sp?seller=A2Y74PRXV2P6SN
23.	PARTS XPRESS STORE	https://www.amazon.com/sp?seller=A18943SGD7X6KS
24.	Parts-Outlet	https://www.amazon.com/sp?seller=A29JKI1RMX1A0E
25.	Pottnar Store	https://www.amazon.com/sp?seller=A3UT223SO7JDA
26.	Rankao-EU	https://www.amazon.co.uk/sp?seller=a16j79djha579
27.	Rimous	https://www.amazon.com/sp?seller=A3HD80JAJMOZ8U
28.	SB Components Ltd	https://www.amazon.co.uk/sp?seller=A2717MKXZVZ1ZW
29.	SofaBaton	https://www.amazon.com/sp?seller=A1N3NJ1ATIMDAK
30.	Sourcing Remote	https://www.amazon.com/sp?seller=A171VDD0QICR2T
31.	USonline911	https://www.amazon.com/sp?seller=A2Y948N6N5PM23
32.	Value Foremost	https://www.amazon.com/sp?seller=A34ME3ISW4VTC5
33.	vtinva	https://www.amazon.com/sp?seller=A3J8JA83NK0A0X
34.	WINBOUS	https://www.amazon.com/sp?seller=A1KS4HXHOAA99V
35.	Xinyu UK	https://www.amazon.es/sp?seller=A39V3CUVEQP3GO https://www.amazon.co.uk/sp?seller=A39V3CUVEQP3GO
36.	xuuyuu	https://www.amazon.ca/sp?seller=A3UOH6UFKYX3BS
37.	Yaotieci SHOP	https://www.amazon.com/sp?seller=A2Q4LXGRPZHRA
38.	YJY SHOP	https://www.amazon.com/sp?seller=A1Y1U3TXKM048O
39.	15983070819@163.com	https://www.wish.com/merchant/590d869a2da1ba196e0ad586
40.	AgileDragon	https://www.wish.com/merchant/547f0ba5653d51314ac44285
41.	amargaret	https://www.wish.com/merchant/5831c4f7ef56284f7534b824
42.	ann-yanguang88	https://www.wish.com/merchant/578b7bad095367532883d5d6
43.	AuntbingluuX	https://www.wish.com/merchant/5f4f6120fedbc502820a2e6b
44.	baihe	https://www.wish.com/merchant/57860a5294bcf1439be28066
45.	BeadDreamShop	https://www.wish.com/merchant/58af02739dc860521d2eb68d
46.	blinbling001	https://www.wish.com/merchant/578e386e6a303a0eec755c70
47.	Caeiore	https://www.wish.com/merchant/5832fd9c42abfb1b8455b5e4
48.	CartoonsDibujos	https://www.wish.com/merchant/57dba6428bc4e8109ad5ca11
49.	chanvincy	https://www.wish.com/merchant/57149f2b853cde590cd98882
50.	chenliliang	https://www.wish.com/merchant/5931494f20e1bf316477f32c
51.	cherish	https://www.wish.com/merchant/55bad358ec31eb41e4cf7a2d
52.	CONTROL INN	https://www.wish.com/merchant/5ecf4675fdf5965bbcd3bf4f
53.	Crazy Gai	https://www.wish.com/merchant/582af230ae08867481e38edd
54.	Cynthia Yoder	https://www.wish.com/merchant/58af04c315241652046542a9

Doe No.	Defendant Seller	Defendant Online Marketplace
55.	dongfangfang	https://www.wish.com/merchant/584233ed1341994f72a70639
56.	Electronic_outlet	https://www.wish.com/merchant/607e381db20cf82213520cfc
57.	EveryDayLifeStore	https://www.wish.com/merchant/565415b43608bc201c65acfc
58.	f-cloths	https://www.wish.com/merchant/578e2eba2343010efaa2610b
59.	Francisco Lima	https://www.wish.com/merchant/5859f51ed800734d59a0392c
60.	fuyangfamen	https://www.wish.com/merchant/56e3d8ee8582fb5e366be8d3
61.	gogofast	https://www.wish.com/merchant/55166b0574c021216213583d
62.	graduator	https://www.wish.com/merchant/5645970eda9e8612a5403377
63.	heibaipei	https://www.wish.com/merchant/5795cb70cb38dd21922fe825
64.	herofun	https://www.wish.com/merchant/56fcc7067415f96ea3a29a76
65.	hexueqing0926	https://www.wish.com/merchant/589983fa76209a4ffb3eac57
66.	hi_lee	https://www.wish.com/merchant/57838f17f1ab1f1131beacf6
67.	highest&coolman	https://www.wish.com/merchant/58501a992bf2c96a06a99de6
68.	hmx881800	https://www.wish.com/merchant/584b9a54159145262176185b
69.	houguofang	https://www.wish.com/merchant/58a7fbd1a7a80b6f64ec95f9
70.	huangchen123	https://www.wish.com/merchant/58410459a81dba0befad0921
71.	huangwenyuan1	https://www.wish.com/merchant/5931110ca126a33883978c7a
72.	jdjhru5478	https://www.wish.com/merchant/59047ec61fb1dc1d00e138d1
73.	jiayunpeng12	https://www.wish.com/merchant/584188cc8108912edcde366a
74.	jinyuzhir	https://www.wish.com/merchant/603379a313006b0dc16faa2d
75.	jocelyn07	https://www.wish.com/merchant/57de433ecc8b99102168403c
76.	KamShun Fashion	https://www.wish.com/merchant/5846cc7acd7c006932f24fbb
77.	kappdo	https://www.wish.com/merchant/5e062a89a57753146b033050
78.	keyofsuccess2016	https://www.wish.com/merchant/57b315d226c88d18eee94a0c
79.	laceskong	https://www.wish.com/merchant/56f8cb2d796b2f58ad96a139
80.	li yunyun	https://www.wish.com/merchant/58da0b45b7bb136efa0b8269
81.	lianghaiyan32	https://www.wish.com/merchant/5844fc8e5291914d4adeaba9
82.	lifefit	https://www.wish.com/merchant/565955e58f5f027e130604e5
83.	lili zhang	https://www.wish.com/merchant/584c17eb81089121f88b8aa3
84.	liujinyang	https://www.wish.com/merchant/58dd14026067365f5d1dec08
85.	Longzhifanny	https://www.wish.com/merchant/5978471f5ea5c55998b8beea
86.	Loverhart	https://www.wish.com/merchant/5a1e5e65ffccf24b61ca68e1
87.	lujinling	https://www.wish.com/merchant/58f02c9a441fb82c7dd0c6e6
88.	mazaolin	https://www.wish.com/merchant/58a9709396f1bb6f151155a6
89.	Mccmyy	https://www.wish.com/merchant/5b79265a559dbd25b255974e
90.	MEFCreationsBoutique	https://www.wish.com/merchant/58b0219ef7f54a50a10aa5f2
91.	Merci smith	https://www.wish.com/merchant/582f229218183f424ca09af7
92.	Ming hing bully clothing	https://www.wish.com/merchant/5899c3197c0f924fed454c0e

Doe No.	Defendant Seller	Defendant Online Marketplace
93.	monsterlady	https://www.wish.com/merchant/5344c1a25aefb06607e48bcd
94.	moshanhua	https://www.wish.com/merchant/58e8bf86259689339ae07e80
95.	mykshop	https://www.wish.com/merchant/5fd48a297885467e6b3935f6
96.	nice2seu	https://www.wish.com/merchant/56f501667b19c65ed788a3fe
97.	noral	https://www.wish.com/merchant/5a0956a00ec30f6ea1d5e36f
98.	orchidfarm	https://www.wish.com/merchant/571488554f5e5759357da868
99.	owes	https://www.wish.com/merchant/5656793b86004b08b2d0f765
100.	paomo	https://www.wish.com/merchant/57875849090d400af5f1e0bf
101.	phonemol	https://www.wish.com/merchant/58bd1f1f48f3a0527d18d535
102.	Principles	https://www.wish.com/merchant/57ecc9068bde84103e1f9cf4
103.	Richapex2016	https://www.wish.com/merchant/5856abd0913e184c9c72c0bf
104.	rocknfemme	https://www.wish.com/merchant/5851e60479b45e6aeaf9dfb9
105.	runandianli	https://www.wish.com/merchant/56a70cc41b8c5a3f1b1b8034
106.	schaef	https://www.wish.com/merchant/5f42cc5ce84e07db8539ae63
107.	smart4u	https://www.wish.com/merchant/5645763c70337932d501afd2
108.	Smilebreath	https://www.wish.com/merchant/57d64383bc23d5101cd76c30
109.	songguifang	https://www.wish.com/merchant/58df907d7f36b352ca3e6394
110.	SOPHWI-LP	https://www.wish.com/merchant/584c1b4b334bb04d51503d88
111.	sunny	https://www.wish.com/merchant/584534057f6c0d4ca53569ae
112.	thumbup	https://www.wish.com/merchant/56fb6b2dc1bed17394d51c21
113.	tiancong	https://www.wish.com/merchant/5840f04134599a698571b66b
114.	timesq	https://www.wish.com/merchant/56efa671a9f07f5860ee6311
115.	wangguoqin	https://www.wish.com/merchant/5848e583d23c144d2c3b8781
116.	wangjing120803	https://www.wish.com/merchant/589b0e4bbe0fe74ff78f76a9
117.	wanglixia	https://www.wish.com/merchant/584139e6e88f6367d6ddc795
118.	Wasiteasy	https://www.wish.com/merchant/57e0ef2f3a02477561528254
119.	WJANU	https://www.wish.com/merchant/583c49150884751b85e98cef
120.	wudile	https://www.wish.com/merchant/57a2e9ebb2ea3e659e379098
121.	wumei150329	https://www.wish.com/merchant/584a46fba55ed20948d5d9f9
122.	xiaoxiaodedian	https://www.wish.com/merchant/5837f1032f5e53046e9cdeb2
123.	xindong	https://www.wish.com/merchant/57aec069d25a4018b733a48b
124.	xinglongzhuanqian	https://www.wish.com/merchant/582ec9368108914211fa2079
125.	xingstars	https://www.wish.com/merchant/570367598b7f1058f43e3363
126.	xuenvzhuang	https://www.wish.com/merchant/5848d9b068eb840a4ffe9905
127.	Xutao	https://www.wish.com/merchant/5819d4354199ad024c4f3eb3
128.	yangfanlsy	https://www.wish.com/merchant/5899bf818333d24fe970ff84
129.	zhanghongyue	https://www.wish.com/merchant/58e635492d91301f043a9bf0
130.	zhengzhi	https://www.wish.com/merchant/5784a8800d06001a7f062dfd

Exhibit 2

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ROKU INC.,)
)
 Plaintiff,)
)
 v.)
)
 THE INDIVIDUALS, CORPORATIONS, LIMITED)
 LIABILITY COMPANIES, PARTNERSHIPS, AND)
 UNINCORPORATED ASSOCIATIONS)
 IDENTIFIED ON SCHEDULE A HERETO,)
)
 Defendants.)
)
)
)
)
)
)
)
)




Case No.:



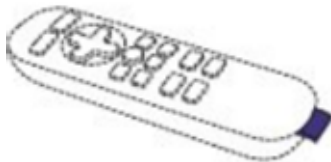

COMPLAINT


Plaintiff ROKU Inc. hereby alleges as follows against the individuals, corporations, limited liability companies, partnerships, and unincorporated associations and foreign entities identified on **Schedule A** attached hereto (collectively, “Defendants”):

INTRODUCTION

1. This action has been filed by Plaintiff to combat online counterfeiters who trade upon Plaintiff’s reputation and goodwill by selling and/or offering for sale products in connection with Plaintiff’s ROKU trademarks, which are covered by the following U.S. Trademark Registrations set out in the table below (collectively, the “ROKU Trademarks”). The registrations are valid, subsisting, and in full force and effect. True and correct copies of the federal trademark registration certificates for the ROKU Trademarks are attached hereto as **Exhibit 1**.

US Trademark Registration No.	Description
6464718	STREAMBAR (word mark)
6076830	Design only mark 
5886527	ROKU (word mark)
5886526	ROKU TOUCH (word mark)
5151588	ROKU & Design mark 
4937515	ROKU & Design mark 
4937514	ROKU (stylized w/o color)

US Trademark Registration No.	Description
	
4937513	ROKU (word mark)
4843920	Design only mark 
4839473	Design only mark 
4618984	STREAMING STICK (word mark)
4286059	ROKU and Design mark 
4286058	ROKU and Design mark (w/o color)

US Trademark Registration No.	Description
	
3177666	ROKU (word mark)

2. Defendants are improperly advertising, marketing and/or selling unauthorized and illegal products (the “Counterfeit Products”) either by reference to or embodying a mark that is identical or substantially identical to at least one of the various ROKU Trademarks, which causes further confusion and deception in the marketplace.

3. The Defendants have created numerous fully interactive commercial internet stores operating under the online marketplace accounts (the “Defendant Domain Names”) and using the account names identified in Schedule A attached hereto (collectively, the “Defendants”).

4. The Defendants design the online marketplace accounts to appear to be selling Plaintiff’s genuine ROKU Products (the “ROKU Products”), while selling inferior imitations of such products.

5. The Defendants’ online marketplace accounts also share unique identifiers, such as design elements and similarities of the counterfeit products offered for sale, establishing a logical relationship between them and suggesting that Defendants’ illegal operations arise out of the same transaction, occurrence, or series of transactions or occurrences.

6. Defendants attempt to avoid liability by going to great lengths to conceal both their identities and the full scope and interworking of their illegal counterfeiting operation. Plaintiff is forced to file this action to combat Defendants’ counterfeiting of the

ROKU Trademarks as well as to protect unknowing consumers from purchasing Counterfeit Products.

7. As a result of Defendants' actions, Plaintiff has been and continues to be irreparably damaged through consumer confusion, dilution, and tarnishment of its valuable trademarks and goodwill and, therefore, seeks injunctive and monetary relief.

8. This Court has personal jurisdiction over each Defendant, in that each Defendant conducts significant business in New York and in this Judicial District, and the acts and events giving rise to this lawsuit of which each Defendant stands accused were undertaken in New York and in this Judicial District.

9. In addition, each Defendant has offered to sell and ship and/or sold and shipped infringing products into this Judicial District.

Subject Matter Jurisdiction

10. This Court has original subject matter jurisdiction over the trademark infringement and false designation of origin claims in this action pursuant to the provisions of the Lanham Act, 15 U.S.C. § 1051 et seq., 28 U.S.C. § 1338(a)–(b), and 28 U.S.C. § 1331.

11. This Court has jurisdiction over the unfair deceptive trade practices claim in this action that arise under the laws of the State of New York 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.

Personal Jurisdiction and Venue

12. Personal jurisdiction exists over Defendants in this Judicial District pursuant to C.P.L.R. § 302(a)(1) and C.P.L.R. § 302(a)(1)(3), or in the alternative, Fed. R. Civ. P. 4(k) because, upon information and belief, Defendants regularly conduct, transact and/or solicit business in New York and in this Judicial District, and/or derive substantial revenue from business transactions in New York and in this Judicial District

and/or otherwise avail themselves of the privileges and protections of the laws of the State of New York such that this Court's assertion of jurisdiction over Defendants does not offend traditional notions of fair play and due process, and/or Defendants' illegal counterfeiting and infringing actions caused injury to Plaintiff in New York and in this Judicial District such that Defendants should reasonably expect such actions to have consequences in New York and this judicial District, for example:

a. Defendants' Merchant Storefronts accept orders of Counterfeit Products from and offer shipping to New York addresses located in this Judicial District. Screenshots of the shopping cart from Defendant Internet Stores allowing Counterfeit Products to be shipped to Manhattan are attached to the declaration of Karina Levitian ("Levitian Decl."), filed contemporaneously herewith, as **Exhibit 2**.

b. Upon information and belief, Defendants were and/or are systematically directing and/or targeting their business activities at consumers in the U.S., including those in New York, in this Judicial District, through accounts with online marketplace platforms such as Amazon and Wish 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 persons in active concert or participation with any of them ("User Account(s)"), through which consumers in the U.S., including New York (and more particularly, in this Judicial District), can view the one or more of Defendants' online marketplace accounts that each Defendant operates ("Defendants' Merchant Storefronts"), uses to communicate with Defendants regarding their listings for Counterfeit Products (as defined *infra*) and to place orders for, receive invoices for and purchase Counterfeit Products for delivery in the U.S., including New York (and more particularly, in this Judicial District), as a means for establishing regular business with the U.S., including New York (and more particularly, in this Judicial District).

c. Upon information and belief, Defendants have transacted business with consumers located in the U.S., including New York (and more particularly, in this Judicial District), for the sale and shipment of Counterfeit Products.

13. Venue is proper in this Court pursuant to 28 U.S.C. §§ 1391(b)(2) because Defendants have committed acts of trademark infringement in this Judicial District, do substantial business in the Judicial District, have registered agents in this Judicial District, and reside or may be found in this district.

Plaintiff

14. Plaintiff is a corporation incorporated under the laws of California and is the registered owner of the ROKU Trademarks referred to above and with their federal registrations attached as Exhibit 1.

15. Plaintiff is, amongst other things, a leading manufacturer of a variety of digital media players and accessories (including remotes) for video streaming and has earned an international reputation for quality, reliability and value. Plaintiff is credited for many breakthroughs that have occurred in the video streaming industry, including its various ROKU products.

The ROKU Products

16. Plaintiff is the official source of ROKU products in the United States, including but not limited to the following exemplary units in its remote and streaming player ranges:

Remotes

Easily replace or upgrade your Roku remote.



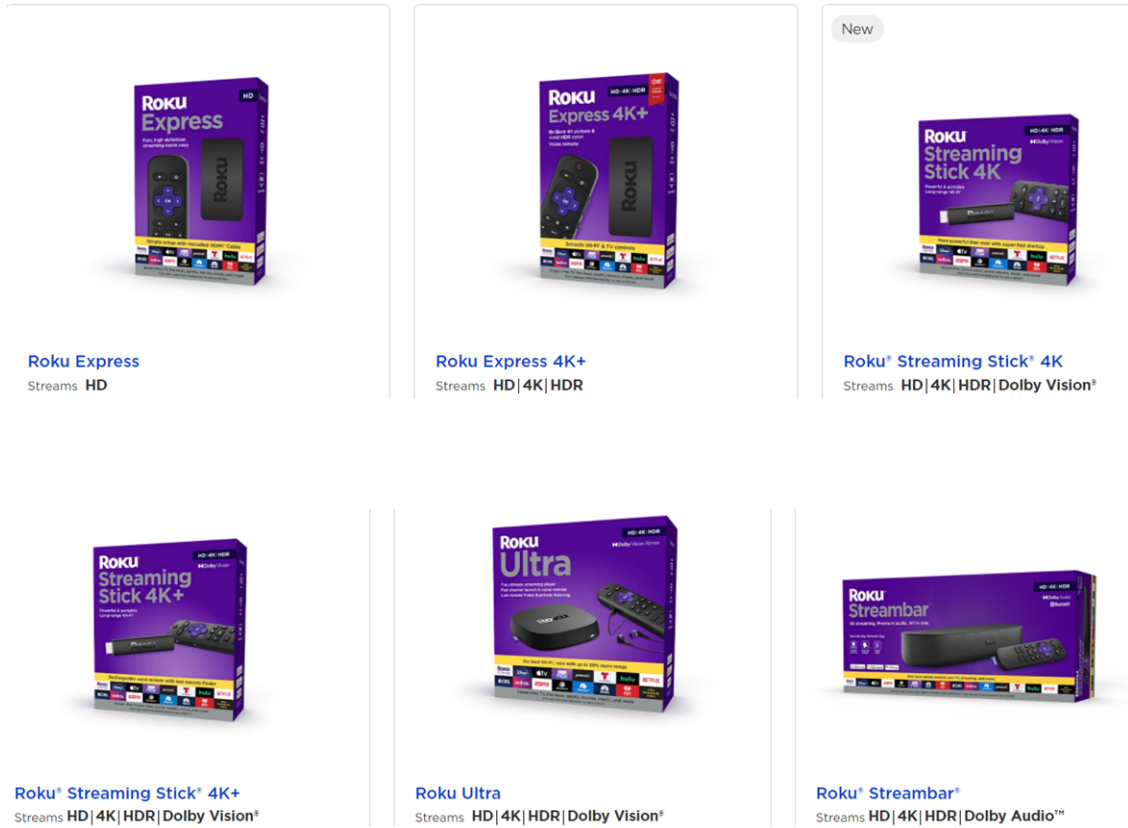
Roku® Voice Remote Pro
Rechargeable with lost remote finder, private listening, and hands-free controls.
\$29.99



Roku® Voice Remote
Power up your TV, adjust the volume, and mute with one remote.
\$19.99



Roku® Simple Remote
\$14.99



17. The ROKU Trademarks are and have been the subject of substantial and continuous marketing and promotion by Plaintiff and Plaintiff has and continues to widely market and promote the ROKU Trademarks in the industry and to consumers. Plaintiff’s promotional efforts include — by way of example but not limitation — substantial print media, the ROKU Products’ website and social media sites, and point of sale materials.

18. The ROKU Trademarks are distinctive and identify the merchandise as goods from Plaintiff. The registrations for the ROKU Trademarks constitutes prima facie evidence of their validity and of Plaintiff’s exclusive right to use those trademarks pursuant to 15 U.S.C. § 1057(b).

19. The ROKU Trademarks qualify as famous marks, as that term is used in 15 U.S.C. §1125 (a)(1), and have been continuously used and never abandoned.

20. Plaintiff has expended substantial time, money, and other resources in developing, advertising and otherwise promoting the ROKU Trademarks. As a result, products bearing any of the ROKU Trademarks are widely recognized and exclusively associated by consumers, the public, and the trade as being products sourced from Plaintiff.

The Defendants

21. Defendants are individuals and business entities who, upon information and belief, reside mainly in the People’s Republic of China or other foreign jurisdictions.

22. Defendants are merchants on the Amazon.com and Wish.com online marketplace platforms, which, upon information and belief, are owned by Amazon.com, Inc. (“Amazon”), a Washington corporation with a principal place of business at 410 Terry Ave N, Seattle 98109 WA, and ContextLogic Inc. (“Wish”), a California corporation with a principal place of business at One Sansome Street, 33rd Floor, San Francisco, CA 94104, respectively, through which Defendants offer for sale and/or sell Counterfeit Products.

The Defendants’ Unlawful Conduct

23. The success of the ROKU Products has resulted in significant counterfeiting.

24. Plaintiff has identified numerous domain names linked to fully interactive websites and marketplace listings on platforms such as Amazon and Wish, including the Defendants’ Merchant Storefronts, which were offering for sale, selling, and importing counterfeit ROKU Products to consumers in this Judicial District and throughout the United States.

25. Defendants have persisted in creating such online marketplaces and internet stores, like the Defendants’ Merchant Storefronts. In fact, such online marketplaces and stores are estimated to receive tens of millions of visits per year and to generate over \$135 billion in annual online sales. According to an intellectual property

rights seizures statistics report issued by the United States Department of Homeland Security, the manufacturer's suggested retail price ("MSRP") of goods seized by the U.S. government in fiscal year 2017 was over \$1.2 billion. Internet websites like the Defendant Internet Stores are also estimated to contribute to tens of thousands of lost jobs for legitimate businesses and broader economic damages such as lost tax revenue every year.

26. On personal knowledge and belief, Defendants facilitate sales by designing the Defendants' Merchant Storefronts so that they appear to unknowing consumers to be authorized online retailers, outlet stores, or wholesalers selling genuine ROKU Products.

27. Many of the Defendants' Merchant Storefronts look sophisticated and accept payment in U.S. dollars via credit cards, Western Union, and PayPal. Defendant Internet Stores often include images and design elements that make it very difficult for consumers to distinguish such counterfeit sites from an authorized website.

28. Defendants further perpetuate the illusion of legitimacy by offering "live 24/7" customer service and using indicia of authenticity and security that consumers have come to associate with authorized retailers, including the McAfee® Security, VeriSign®, Visa®, MasterCard®, and PayPal® logos.

29. Plaintiff has not licensed or authorized Defendants to use any of the ROKU Trademarks and none of the Defendants are authorized retailers of genuine ROKU Products.

30. On personal knowledge and belief, Defendants deceive unknowing consumers by using the ROKU Trademarks without authorization within the product descriptions of their Defendant Internet Stores to attract customers, as well as in some instances, embodied by the Counterfeit Products themselves.

31. On personal knowledge and belief, Defendants also deceive unknowing consumers by using the ROKU Trademarks without authorization within the content,

text, and/or meta tags of their websites to attract various search engines crawling the Internet looking for websites relevant to consumer searches for ROKU Products. Additionally, upon information and belief, Defendants use other unauthorized search engine optimization (“SEO”) tactics and social media spamming so that the Defendant Internet Stores listings show up at or near the top of relevant search results and misdirect consumers searching for genuine ROKU Products. Further, Defendants utilize similar illegitimate SEO tactics to propel new domain names to the top of search results after others are shut down. As such, where appropriate, Plaintiff also seeks to disable Defendant Domain Names owned by Defendants that are the means by which the Defendants could continue to sell counterfeit ROKU Products into this District.

32. On information and belief, Defendants go to great lengths to conceal their identities and often use multiple fictitious names and addresses to register and operate their massive network of Defendant Internet Stores.

33. For example, it is common practice for counterfeiters to register their domain names and/or User Accounts with incomplete information, randomly typed letters, or omitted cities or states.

34. And many Defendant Domain Names use privacy services that conceal the owners’ identity and contact information. On personal knowledge and belief, Defendants regularly create new websites and online marketplace accounts on various platforms using the identities listed in Schedule A to the Complaint, as well as other unknown fictitious names and addresses.

35. On personal knowledge and belief, even though Defendants operate under multiple fictitious names, there are numerous similarities among the Defendants’ Merchant Storefronts. For example, some of the Defendant marketplace websites have virtually identical layouts, even though different aliases were used to register the respective domain names.

36. In addition, the Counterfeit Products for sale in the Defendants' Merchant Storefronts 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.

37. The Defendants' Merchant Storefronts also include other notable common features, including accepted payment methods, check-out methods, meta data, illegitimate SEO tactics, HTML user-defined variables, domain redirection, lack of contact information, identically or similarly priced items and volume sales discounts, similar hosting services, similar name servers, and the use of the same text and images.

38. In addition, Defendants in this case and defendants in other similar cases against online counterfeiters use a variety of other common tactics to evade enforcement efforts. For example, counterfeiters like Defendants will often register new online marketplace accounts under User Accounts once they receive notice of a lawsuit.¹

39. Counterfeiters also often move website hosting to rogue servers located outside the United States once notice of a lawsuit is received. Rogue servers are notorious for ignoring take down demands sent by brand owners.²

40. Counterfeiters also typically ship products in small quantities via international mail to minimize detection by U.S. Customs and Border Protection. A 2018 U.S. Customs and Border Protection report on seizure statistics indicated that the Internet

¹ <https://www.ice.gov/news/releases/buyers-beware-ice-hsi-and-cbp-boston-warn-consumers-about-counterfeit-goods-during> (noting counterfeiters are adept at "setting up online stores to lure the public into thinking they are purchasing legitimate good on legitimate websites") (last visited October 18, 2021).

² While discussed in the context of false pharma supply chains, rogue internet servers and sellers are a well-known tactic that have even been covered in congressional committee hearings. See <https://www.govinfo.gov/content/pkg/CHRG-113hrg88828/html/CHRG-113hrg88828.htm> (last visited October 18, 2021).

has fueled a sharp increase in the number of small packages of counterfeit goods shipped through the mail and express carriers as opposed to larger shipping containers.

41. Further, counterfeiters such as Defendants typically operate multiple credit card merchant accounts and PayPal accounts behind layers of payment gateways so that they can continue operation in spite of Plaintiff's enforcement efforts.

42. On personal knowledge and belief, Defendants maintain off-shore bank accounts and regularly move funds from their PayPal accounts to off-shore bank accounts outside the jurisdiction of this Court. Indeed, analysis of PayPal transaction logs from previous similar cases indicates that offshore counterfeiters regularly move funds from U.S.-based PayPal accounts to foreign-based bank accounts outside the jurisdiction of this Court.

43. Defendants, without any authorization or license from Plaintiff, have knowingly and willfully used and continue to use the ROKU Trademarks in connection with the advertisement, distribution, offering for sale, and sale of Counterfeit Products into the United States and New York over the Internet.

44. Each Defendant Internet Store offers shipping to the United States, including New York (in this Judicial District) and, on information and belief, each Defendant has offered to sell counterfeit ROKU products into the United States, including New York (in this Judicial District), which is likely to cause and has caused confusion, mistake, and deception by and among consumers and is irreparably harming Plaintiff.

FIRST CAUSE OF ACTION

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

[Against Defendants Designated in Schedule A]

45. Plaintiff repeats and incorporates by reference herein its allegations contained in paragraphs 1-44 of this Complaint.

46. This is a trademark infringement action against Defendants based on their unauthorized use in commerce of counterfeit imitations of the registered ROKU Trademarks in connection with the sale, offering for sale, distribution, and/or advertising of infringing goods. The ROKU Trademarks are highly distinctive marks. Consumers have come to expect the highest quality from Plaintiff's products provided under any of the various ROKU Trademarks.

47. 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 the ROKU Trademarks without Plaintiff's permission.

48. Plaintiff is the registered owner of the ROKU Trademarks and official source of ROKU Products. The United States Registrations for the ROKU Trademarks (Exhibit 1) are in full force and effect. Upon information and belief, Defendants have knowledge of Plaintiff's rights in the ROKU Trademarks and are willfully infringing and intentionally using counterfeits of the ROKU Trademarks. Defendants' willful, intentional, and unauthorized use of the ROKU Trademarks is likely to cause and is causing confusion, mistake, and deception as to the origin and quality of the counterfeit goods among the general public.

49. Defendants' activities constitute willful trademark infringement and counterfeiting under 15 U.S.C. §§ 1114, 1117.

50. The injuries and damages sustained by Plaintiff have been directly and proximately caused by Defendants' wrongful reproduction, use, advertisement, promotion, offering to sell, and sale of counterfeit ROKU products.

51. 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 ROKU Trademarks.

SECOND CAUSE OF ACTION

FALSE DESIGNATION OF ORIGIN (15 U.S.C. § 1125(a))

[Against Defendants Designated in Schedule A]

52. Plaintiff repeats and incorporates by reference herein its allegations contained in paragraphs 1-51 of this Complaint.

53. Defendants' promotion, marketing, offering for sale, and sale of counterfeit ROKU products 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 ROKU products by Plaintiff.

54. By using the ROKU Trademarks in connection with the sale of counterfeit ROKU products, Defendants create a false designation of origin and a misleading representation of fact as to the origin and sponsorship of the counterfeit ROKU products.

55. Defendants' conduct constitutes willful false designation of origin and misrepresentation of fact as to the origin and/or sponsorship of the counterfeit ROKU products to the general public under 15 U.S.C. §§ 1114, 1125.

56. 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.

THIRD CAUSE OF ACTION

UNFAIR COMPETITION

(New York Common Law)

[Against Defendants Designated in Schedule A]

57. Plaintiff repeats and incorporates by reference herein its allegations contained in paragraphs 1-56 of this Complaint.

58. Plaintiff has not licensed or authorized Defendants to use the ROKU Trademarks and none of the Defendants are authorized retailers of genuine ROKU Products.

59. Defendants knowingly and intentionally trade upon Plaintiff's reputation and goodwill by selling and/or offering for sale products in connection with Plaintiff's ROKU Trademarks.

60. Defendants' promotion, marketing, offering for sale, and sale of Counterfeit Products has created and is creating a likelihood of confusion, mistake, and deception among the general public as to the quality, affiliation, connection, or association with Plaintiff or the origin, sponsorship, or approval of Defendants' Counterfeit Products by Plaintiff.

61. Defendants knew, or should have known, that their promotion, marketing, offering for sale, and sale of counterfeit ROKU products has caused and will continue to cause confusion, mistake, and deception among purchasers, users, and the public.

62. In fact, Defendants have fraudulently represented by their statements and actions that the Counterfeit Products are Plaintiff's products including, for example, by: (i) using SEO tactics and social media to misdirect customers seeking ROKU Products to Defendants' online marketplace accounts; (ii) using deceptive advertising practices within the text and metadata of the online marketplace accounts; and (iii) taking other steps to deceive and confuse the consuming public.

63. On information and belief, Defendants' conduct is willful and intentional as Defendants attempt to avoid liability by concealing their identities, using multiple fictitious names and addresses to register and operate their illegal counterfeiting operations and Defendant Internet Stores.

64. Plaintiff has no adequate remedy at law, and Defendants' conduct has caused Plaintiff to suffer damage to its reputation and goodwill. Unless enjoined by the

Court, Plaintiff will suffer future irreparable harm as a direct result of Defendants' unlawful activities.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against Defendants and each of them as follows:

1. 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. using the ROKU Trademarks or any mark substantially identical or confusingly similar to the ROKU Trademarks in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine ROKU product or is not authorized by Plaintiff to be sold in connection with the ROKU Trademarks;
- b. passing off, inducing, or enabling others to sell or pass off any product as a genuine ROKU product or any other product produced by Plaintiff that is not Plaintiff's or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale under the ROKU Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' counterfeit ROKU products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
- d. further infringing the ROKU Trademarks and damaging Plaintiff's goodwill;
- e. otherwise competing unfairly with Plaintiff in any manner;

- f. 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 trademark including the ROKU Trademarks or any marks substantially identical or confusingly similar to the ROKU Trademarks;
- g. using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names, 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 ROKU Products; and
- h. operating and/or hosting websites at the Defendant Domain Names that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing the ROKU Trademarks or any marks substantially identical or confusingly similar to the ROKU Trademarks that is not a genuine ROKU Product or not authorized by Plaintiff to be sold in connection with the ROKU Trademarks.

2. Entry of an Order that Amazon, Wish, and any other online marketplace account provider:

- a. disable and cease providing services for any accounts through which Defendants engage in the sale of Counterfeit Products, including any accounts associated with the Defendants listed on Schedule A to the Complaint;

- b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of Counterfeit Products; and
- c. take all steps necessary to prevent links to the Defendant Domain Names identified on Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Domain Names from any search index.

3. 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 the ROKU Trademarks be increased by a sum not exceeding three times the amount thereof as provided by 15 U.S.C. § 1117.

4. In the alternative, that Plaintiff be awarded statutory damages pursuant to 15 U.S.C. § 1117(c) of not less than \$1,000 and not more than \$2,000,000 for each and every use of the ROKU Trademarks;

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

6. Award any and all other relief that this Court deems just and proper.

Dated: January 10, 2022

Respectfully submitted,

COLE SCHOTZ P.C.

By: /s/ Michael R. Yellin
Michael R. Yellin
1325 Avenue of the Americas
19th Floor
New York, New York 10017
(201)525-6258
myellin@coleschotz.com

-and-

THOITS LAW
Christopher Tom, Esq.
400 Main Street, Suite 250
Los Altos, CA 94022
(650) 327 4200
ctom@thoits.com

Attorneys for Plaintiff Roku Inc.

Exhibit 3

- (4) expedited discovery allowing Plaintiff to inspect and copy Defendants' records relating to the manufacture, distribution, offering for sale, and sale of Counterfeit Products, as well as Defendants' financial accounts and other identified assets;
- (5) service by electronic mail and electronic publication; and
- (6) ordering Defendants to show cause why a preliminary injunction should not issue on the return date; and

Based on the papers and other evidence submitted in support to the Application, and for good cause shown, the Court makes the following findings of fact and conclusions of law:

FACTUAL FINDINGS & CONCLUSIONS OF LAW

1. Plaintiff is likely to prevail on its trademark infringement, false designation of origin, and unfair competition claims at trial.
2. As a result of Defendants' misconduct, Plaintiff is likely to suffer immediate and irreparable losses, damages, and injuries before Defendants can be heard in opposition, unless Plaintiff's application for *ex parte* relief is granted. For example:
 - a. Defendants have offered for sale substandard and unauthorized Counterfeit Products bearing, using, or infringing on the ROKU Trademarks through accounts with the online marketplace platforms Amazon.com and/or Wish (the "Marketplace Platforms") held by Defendants (the "User Account(s)").
 - b. Plaintiff has well-founded fears that more Counterfeit Products will appear in the marketplace using the same User Accounts or new and different User Accounts; that consumers may be misled, confused and disappointed by the quality of these Counterfeit Products, resulting in injury to Plaintiff's reputation and goodwill and, in particular, the reputation and good will related to products properly bearing, using, and sold utilizing the ROKU Trademarks (the "ROKU Products").

c. Plaintiff has well-founded fears that if it proceeds on notice to Defendants on this Application, Defendants will: (i) transfer, conceal, dispose of, or otherwise destroy the Counterfeit Products and information concerning the Counterfeit Products; (ii) transfer, conceal, dispose of, or otherwise hide the ill-gotten proceeds from the improper sale of the Counterfeit Products; and/or (iii) close down existing User Accounts, transfer User Account information, and/or open a new User Account through which Defendants can improperly advertise, market, promote, distribute, offer for sale and/or sell the Counterfeit Products under a new or different alias, allowing Defendants' misconduct to continue with little or no consequence.

3. On balance, the 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 Plaintiff, its business, and the goodwill and reputation built up in and associated with the ROKU Trademarks if a temporary restraining order is not issued.

4. The public interest favors issuance of the temporary restraining order to protect the public from being deceived and defrauded by Defendants' passing off their Counterfeit Products as Plaintiff's ROKU Products.

5. Service on Defendants via electronic means is reasonably calculated to result in proper notice to Defendants.

6. If Defendants are given notice of the Application, they are likely to conceal, transfer, or otherwise dispose of their ill-gotten proceeds from their sales of Counterfeit Products. Therefore, good cause exists for granting Plaintiff's request to proceed *ex parte* and for an asset restraining order. It typically takes banks and other financial institutions (including those defined below as the "Financial Institutions"), as well as online marketplace accounts, approximately five

(5) days after service of an Order like this one to locate, attach, and freeze Defendants' Assets (defined below), Defendants' Accounts (defined below), and/or the User Accounts, and service on Defendants should not take place until such actions are completed.

7. Similarly, if Defendants are given notice of the Application, they are likely to destroy, move, hide or otherwise make inaccessible the records and documents relating to Defendants' manufacture, importing, advertising, marketing, distributing, offering for sale and/or sale of the Counterfeit Products. Thus, Plaintiff has established good cause for expedited discovery to be ordered.

ORDER

Based on the foregoing findings of fact and conclusions of law, Plaintiff's Application is hereby **GRANTED** and it is **ORDERED** as follows:

Temporary Restraints

1. As sufficient causes has been shown, Defendants are temporarily enjoined and restrained from engaging in any of the following conduct pending the return date of the Application as referenced below:

- a. Using the ROKU Trademarks or any other marks substantially identical or confusingly similar to the ROKU Trademarks in connection with the distribution, marketing, advertising, offering for sale, or sale of any Counterfeit Products;
- b. Passing off, inducing, or enabling others to sell or pass off any product as a genuine ROKU Product that is not, in fact, any of Plaintiff's ROKU Products and/or not produced under the authorization, control, or supervision of Plaintiff and approved by Plaintiff for sale under the ROKU Trademarks;

- c. Committing any acts calculated to cause consumers to believe that Defendants' Counterfeit Products are those sold under the authorization, control, or supervision of Plaintiff, or are sponsored by, approved by, or otherwise connected with Plaintiff;
- d. Further infringing the ROKU Trademarks and damaging Plaintiff's goodwill;
- e. 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(s) and/or embodies any of the ROKU Trademarks or any marks substantially identical or confusingly similar to any of the ROKU Trademarks;
- f. Using, linking to, transferring, selling, exercising control over, or otherwise owning the User Accounts, the Defendant Internet Stores, or any other domain name or online market place account that is being used to sell or is the means by which Defendants could continue to sell Counterfeit Products; and
- g. Operating and/or hosting websites and/or any other web presence registered or operated by Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product embodying or bearing any of the ROKU Trademarks or any marks substantially identical or confusingly similar to the ROKU Trademarks.

Temporary Transfer of Defendant Internet Stores

2. Within five (5) days of receipt of this Order, the Marketplace Platforms are directed

to:

- a. disable and cease providing services for any User Accounts through which Defendants engage in the sale of Counterfeit Products, including any User Accounts associated with the Defendants listed on Schedule A to the Complaint (which is also attached hereto);
- b. disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of Counterfeit Products; and
- c. take all steps necessary to prevent links to the Defendant Internet Stores identified on Schedule A from displaying in search results, including, but not limited to, removing links to the Defendant Internet Stores from any search index.

Temporary Asset Restraint

3. Pursuant to Fed. R. Civ. P. 64 and 65, as well as C.P.L.R. 6201, and this Court's inherent equitable power to issue provisional remedies ancillary to its authority to provide final equitable relief, as sufficient cause has been shown, that within five (5) days of receipt service of this Order, that (i) Contextlogic, Inc. ("Wish"), (ii) PayPal, Inc. ("PayPal"), (iii) Payoneer, Inc. ("Payoneer"), (iv) the Alibaba Group d/b/a Alibaba.com and Aliexpress.com ("Alibaba"), (v) Amazon Payment Systems, Inc. and Amazon.com, Inc. ("Amazon"), (vi) Ping Pong Global Solutions, Inc. ("Ping Pong"), (vii) eBay, Inc. ("eBay"), (viii) Coinbase Global, Inc. ("Coinbase"), (ix) LianLian Global t/as LL Pay U.S., LLC ("LianLian"), (x) AllPay Limited ("AllPay"), (xi) Union Mobile Financial Technology Co., Ltd ("Union Mobile"), (xii) World First UK Ltd. ("World First"), (xiii) Paxful, Inc. ("Paxful"), (xiv) and other payment processing service providers (collectively referred to as the "Financial Institutions") shall locate all accounts associated with Defendants (the "Defendants' Accounts") and other assets belonging to Defendants, including any cryptocurrency (the "Defendants' Assets") and shall

locate, attach, and restrain the transfer or disposing of monies or funds from Defendants' Accounts, as well as the transfer or disposing of Defendants' Assets, until further ordered by this Court. The Financial Institutions shall provide written confirmation of their compliance with the foregoing to Plaintiffs' counsel.

Expedited Discovery

4. As sufficient cause has been shown, within five (5) days of receipt of service of this Order, the Financial Institutions, including each of the Marketplace Platforms in their capacity as an online marketplace platform, shall provide the following information to Plaintiff's counsel (to the extent such information is in the Financial Institutions' and/or Marketplace Platforms' possession, custody, or control):

- a. Identifying information for Defendants, including all available contact information (which shall include, if available, all known e-mail addresses and mailing addresses), as well as account numbers and account balances.
- b. Any User Accounts and/or online marketplace websites affiliated with Defendants that are not listed on Schedule A to the Complaint (and attached hereto).
- c. Information concerning any of the Defendants' Accounts or Defendants' Assets including any financial accounts affiliated with the Defendants via any means including, without limitation, the Financial Institutions, as well as any other merchant account providers, payment providers, third party processors, cryptocurrency platforms and credit card associations (e.g. MasterCard and VISA).

Service by Electronic Mail and/or Electronic Publication

5. Pursuant to Fed. R. Civ. P. 4(f)(3), as sufficient cause has been shown, that service of this Order and the Summons and Complaint may be made on, and shall be deemed effective as to Defendants if it is completed by either of the following means:

- a. Delivery of: (i) PDF copies of this Order together with the Summons and Complaint; (ii) a link to a website where each Defendant will be able to download PDF copies of this Order together with the Summons and Complaint, and all papers filed in support of Plaintiff's Application (the "Link") to Defendants' e-mail addresses as provided by the Financial Institutions and/or Marketplace Platforms.
- b. Requesting that the Financial Institutions and/or Marketplace Platforms cause Defendants' online marketplace website(s) to redirect to the Link.

6. Such alternative service by electronic means ordered herein shall be made within five (5) days of the Financial Institutions compliance with Paragraphs 3 and 4 of this Order.

7. The Clerk of Court is directed to issue a single original summons in the name of "THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A TO THE COMPLAINT" that shall apply to all Defendants.

Security Bond

8. Plaintiff shall deposit with the Court Five Thousand Dollars (\$5,000.00), either cash, cashier's check or surety bond, as security, which amount was determined adequate for the payment of such damages as any person may be entitled to recover as a result of a wrongful restraint hereunder.

Sealing Order

10. Schedule A to the Complaint and Exhibit 2 to the Declaration of Karina Levitian shall remain sealed until Defendants' financial accounts and assets are restrained.

11. Plaintiff shall file unsealed versions of Schedule A to the Complaint and Exhibit 2 to the Declaration of Karina Levitian using the CM/ECF system prior to the expiration of this Order.

Application to Vacate or Dissolve

12. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two (2) days' notice to Plaintiff or on shorter notice as set by this Court.

IT IS FURTHER ORDERED that a hearing shall be held on February 1, 2022 at 10:00 a.m./~~10:00~~ which Plaintiff may present its arguments in support of its request for issuance of a preliminary injunction. At such time, any Defendants may also be heard as to opposition to Plaintiff's Application.

IT IS FURTHER ORDERED that opposing papers, if any, shall be filed and served on or before January 28, 2022, at 12:00 ~~12:00~~/p.m.

This Temporary Restraining Order without notice is entered at 4:00 p.m. on January 20, 2022, and shall remain in effect for fourteen (14) days.

Paul A. Sandberg
UNITED STATES DISTRICT JUDGE

Exhibit 4

AO 440 (Rev. 06/12) Summons in a Civil Action

UNITED STATES DISTRICT COURT

for the

Southern District of New York

Roku Inc.,

Plaintiff(s)

v.

The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A to the Complaint,

Defendant(s)

Civil Action No. 22-cv-202

SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

SEE ATTACHED RIDER.

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney,

whose name and address are: Michael R. Yellin, Esq. Cole Schotz P.C. 1325 Avenue of the Americas, 19th Floor New York, New York 10019 myellin@coleschotz.com

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

RUBY J. KRAJICK CLERK OF COURT

Signature of Clerk or Deputy Clerk

JAN 31 2022

Date:

AO 440 (Rev. 06/12) Summons in a Civil Action (Page 2)

Civil Action No. 22-cv-202

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))

The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A to the Complaint.

This summons for (name of individual and title, if any) was received by me on (date) January 31, 2022 .

I, I personally served the summons on the individual at (place) on (date) ; or

I, I left the summons at the individual's residence or usual place of abode with (name), a person of suitable age and discretion who resides there, on (date), and mailed a copy to the individual's last known address; or

I, I served the summons on (name of individual), who is designated by law to accept service of process on behalf of (name of organization) on (date) ; or

I, I returned the summons unexecuted because ; or

Other (specify): On January 31, 2022, I sent an email to the email addresses provided by third party online marketplace platforms for the defendants as identified in the Schedule A to the Complaint, attaching a copy of the Court Issued Summons, Complaint and Order Adjourning Preliminary Injunction Hearing and Extending Defendants' Time to Oppose Plaintiff's Request for Preliminary Injunction (Docket #29).

My fees are \$ for travel and \$ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: June 13, 2022

/s/ Christopher Tom Server's signature

Christopher Tom, Attorney Printed name and title

400 Main Street, #250, Los Altos, CA 94022 Server's address

Additional information regarding attempted service, etc:

Roku Inc.

v.

The Individuals, Corporations, Limited Liability Companies, Partnerships, and
Unincorporated
Associations Identified on Schedule A to the Complaint

Civil Action No: 22-cv-202

RIDER TO SUMMONS IN A CIVIL ACTION

To: (Defendant's name and address)

Doe No.	Defendant Seller	Defendant Online Marketplace
1.	akaddy	https://www.amazon.co.uk/sp?seller=AZMZ38E5CSYOF https://www.amazon.es/sp?seller=AZMZ38E5CSYOF
2.	Auriver	https://www.amazon.co.uk/sp?seller=A1MS8VLVWO1JTO
3.	Auteey	https://www.amazon.com/sp?seller=A2H6A0PK2KXGO2
4.	Buy & Delight	https://www.amazon.com/sp?seller=A36HDWD6VFTIW4
5.	Carbonline	https://www.amazon.com/sp?seller=A1P6UUT8SQA5IV
6.	CHUNGHOP STORE	https://www.amazon.com/sp?seller=A31V65U0LFCASF
7.	CØLIPSØ	https://www.amazon.com/sp?seller=A1HBDXH34Q3BT7
8.	EleLink Shop	https://www.amazon.co.uk/sp?seller=A2VDAMJ60YOTRZ
9.	Feitian shop	https://www.amazon.com/sp?seller=A2BK5CBS2FY994
10.	Flying's Shop	https://www.amazon.com/sp?seller=A2NU4BCWRI3E3S
11.	Gaudi	https://www.amazon.com/sp?seller=A3SXZVKR9JCQKK
12.	Hojay Store	https://www.amazon.com/sp?seller=A3PPY64DX3IRCS
13.	HzgangDirect	https://www.amazon.com/sp?seller=A3E8ZAQLE3WB1O
14.	JIANSHE	https://www.amazon.co.uk/sp?seller=A1UC9L6K2VZ1RH
15.	JEM&JULES	https://www.amazon.com/s?me=A3KJA3ZC4P8OAR
16.	JustFine	https://www.amazon.com/sp?seller=A23SYZU9KXD386
17.	Lazmin112	https://www.amazon.co.uk/sp?seller=AKZ77D6L5UUJM https://www.amazon.es/sp?seller=AKZ77D6L5UUJM
18.	littlefishlittlecat	https://www.amazon.com/sp?seller=A3FLNV2TDV00UC

Doe No.	Defendant Seller	Defendant Online Marketplace
19.	luokeli	https://www.amazon.com/sp?seller=A1HXIVM39MVE9S
20.	Melody-Store	https://www.amazon.com/sp?seller=AFDYL8IJUUIT
21.	Outlet-Express Store	https://www.amazon.com/sp?seller=A3C72VOFBASADK
22.	paialu	https://www.amazon.com/sp?seller=A2Y74PRXV2P6SN
23.	PARTS XPRESS STORE	https://www.amazon.com/sp?seller=A18943SGD7X6KS
24.	Parts-Outlet	https://www.amazon.com/sp?seller=A29JKI1RMX1A0E
25.	Pottnar Store	https://www.amazon.com/sp?seller=A3UT223SO7JDA
26.	Rankao-EU	https://www.amazon.co.uk/sp?seller=a16j79djhha579
27.	Rimous	https://www.amazon.com/sp?seller=A3HD80JAJMOZ8U
28.	SB Components Ltd	https://www.amazon.co.uk/sp?seller=A2717MKXZVZ1ZW
29.	SofaBaton	https://www.amazon.com/sp?seller=A1N3NJ1ATIMDAK
30.	Sourcing Remote	https://www.amazon.com/sp?seller=A171VDD0QICR2T
31.	USonline911	https://www.amazon.com/sp?seller=A2Y948N6N5PM23
32.	Value Foremost	https://www.amazon.com/sp?seller=A34ME3ISW4VTC5
33.	vtinva	https://www.amazon.com/sp?seller=A3J8JA83NK0A0X
34.	WINBOUS	https://www.amazon.com/sp?seller=A1KS4HXH0AA99V
35.	Xinyu UK	https://www.amazon.es/sp?seller=A39V3CUVEQP3GO https://www.amazon.co.uk/sp?seller=A39V3CUVEQP3GO
36.	xuuyuu	https://www.amazon.ca/sp?seller=A3UOH6UFKYYX3BS
37.	Yaotieci SHOP	https://www.amazon.com/sp?seller=A2Q4LXGRPVMHZRA
38.	YJY SHOP	https://www.amazon.com/sp?seller=A1Y1U3TXKM0480
39.	15983070819@163.com	https://www.wish.com/merchant/590d869a2da1ba196e0ad586
40.	AgileDragon	https://www.wish.com/merchant/547f0ba5653d51314ac44285
41.	amargaret	https://www.wish.com/merchant/5831c4f7ef56284f7534b824
42.	ann-yanguang88	https://www.wish.com/merchant/578b7bad095367532883d5d6
43.	AuntbingluuX	https://www.wish.com/merchant/5f4f6120fedbc502820a2e6b
44.	baihe	https://www.wish.com/merchant/57860a5294bcf1439be28066
45.	BeadDreamShop	https://www.wish.com/merchant/58af02739dc860521d2eb68d
46.	blinbling001	https://www.wish.com/merchant/578e386e6a303a0eec755c70
47.	Caciore	https://www.wish.com/merchant/5832fd9c42abfb1b8455b5e4
48.	CartoonsDibujos	https://www.wish.com/merchant/57dba6428bc4e8109ad5ca11
49.	chanvincy	https://www.wish.com/merchant/57149f2b853cde590cd98882
50.	chenliliang	https://www.wish.com/merchant/5931494f20e1bf316477f32c
51.	cherish	https://www.wish.com/merchant/55bad358ec31eb41e4cf7a2d
52.	CONTROL INN	https://www.wish.com/merchant/5ecf4675fdf5965bbcd3bf4f
53.	Crazy Gai	https://www.wish.com/merchant/582af230ae08867481e38edd
54.	Cynthia Yoder	https://www.wish.com/merchant/58af04c315241652046542a9

Doe No.	Defendant Seller	Defendant Online Marketplace
55.	dongfangfang	https://www.wish.com/merchant/584233ed1341994f72a70639
56.	Electronic outlet	https://www.wish.com/merchant/607e381db20cf82213520cfc
57.	EveryDayLifeStore	https://www.wish.com/merchant/565415b43608bc201c65acfc
58.	f-cloths	https://www.wish.com/merchant/578e2eba2343010efaa2610b
59.	Francisco Lima	https://www.wish.com/merchant/5859f51ed800734d59a0392c
60.	fuyangfamen	https://www.wish.com/merchant/56e3d8ee8582fb5e366be8d3
61.	gogofast	https://www.wish.com/merchant/55166b0574c021216213583d
62.	graduator	https://www.wish.com/merchant/5645970eda9e8612a5403377
63.	heibaipei	https://www.wish.com/merchant/5795cb70cb38dd21922fe825
64.	herofun	https://www.wish.com/merchant/56fcc7067415f96ea3a29a76
65.	hexueqing0926	https://www.wish.com/merchant/589983fa76209a4ffb3eac57
66.	hi lee	https://www.wish.com/merchant/57838f17f1ab1f1131beacf6
67.	highest&coolman	https://www.wish.com/merchant/58501a992bf2c96a06a99de6
68.	hmx881800	https://www.wish.com/merchant/584b9a54159145262176185b
69.	houguofang	https://www.wish.com/merchant/58a7fbd1a7a80b6f64ec95f9
70.	huangchen123	https://www.wish.com/merchant/58410459a81dba0befad0921
71.	huangwenyuan1	https://www.wish.com/merchant/5931110ca126a33883978c7a
72.	jdjhru5478	https://www.wish.com/merchant/59047ec61fb1dc1d00e138d1
73.	jiayunpeng12	https://www.wish.com/merchant/584188cc8108912edcde366a
74.	jinyuzhir	https://www.wish.com/merchant/603379a313006b0dc16faa2d
75.	jocelyn07	https://www.wish.com/merchant/57de433ecc8b99102168403c
76.	KamShun Fashion	https://www.wish.com/merchant/5846cc7acd7c006932f24fbb
77.	kappdo	https://www.wish.com/merchant/5e062a89a57753146b033050
78.	keyofsuccess2016	https://www.wish.com/merchant/57b315d226c88d18eee94a0c
79.	laceskong	https://www.wish.com/merchant/56f8cb2d796b2f58ad96a139
80.	li yunyun	https://www.wish.com/merchant/58da0b45b7bb136efa0b8269
81.	lianghaiyan32	https://www.wish.com/merchant/5844fc8e5291914d4adeaba9
82.	lifefit	https://www.wish.com/merchant/565955e58f5f027e130604e5
83.	lili zhang	https://www.wish.com/merchant/584c17eb81089121f88b8aa3
84.	liujinyang	https://www.wish.com/merchant/58dd14026067365f5d1dec08
85.	Longzhifanny	https://www.wish.com/merchant/5978471feea5c55998b8beea
86.	Loverhart	https://www.wish.com/merchant/5a1e5e65ffccf24b61ca68e1
87.	lujinling	https://www.wish.com/merchant/58f02c9a441fb82c7dd0c6e6
88.	mazaolin	https://www.wish.com/merchant/58a9709396f1bb6f151155a6
89.	Mccmyy	https://www.wish.com/merchant/5b79265a559dbd25b255974e
90.	MEFCreationsBoutiqu	https://www.wish.com/merchant/58b0219ef7f54a50a10aa5f2
91.	Merci smith	https://www.wish.com/merchant/582f229218183f424ca09af7
92.	Ming hing bully	https://www.wish.com/merchant/5899c3197c0f924fed454c0e

DoeNo.	Defendant Seller	Defendant Online Marketplace
93.	monsterlady	https://www.wish.com/merchant/5344c1a25aefb06607e48bcd
94.	moshanhua	https://www.wish.com/merchant/58e8bf86259689339ae07e80
95.	mykshop	https://www.wish.com/merchant/5fd48a297885467e6b3935f6
96.	nice2seu	https://www.wish.com/merchant/56f501667b19c65ed788a3fe
97.	noral	https://www.wish.com/merchant/5a0956a00ec30f6ea1d5e36f
98.	orchidfarm	https://www.wish.com/merchant/571488554f5e5759357da868
99.	owes	https://www.wish.com/merchant/5656793b86004b08b2d0f765
100.	paomo	https://www.wish.com/merchant/57875849090d400af5f1e0bf
101.	phonemol	https://www.wish.com/merchant/58bd1f1f48f3a0527d18d535
102.	Principles	https://www.wish.com/merchant/57ecc9068bde84103e1f9cf4
103.	Richapex2016	https://www.wish.com/merchant/5856abd0913e184c9c72c0bf
104.	rocknfemme	https://www.wish.com/merchant/5851e60479b45e6aef9dfb9
105.	runandianli	https://www.wish.com/merchant/56a70cc41b8c5a3f1b1b8034
106.	schaef	https://www.wish.com/merchant/5f42cc5ce84e07db8539ae63
107.	smart4u	https://www.wish.com/merchant/5645763c70337932d501afd2
108.	Smilebreath	https://www.wish.com/merchant/57d64383bc23d5101cd76c30
109.	songguifang	https://www.wish.com/merchant/58df907d7f36b352ca3e6394
110.	SOPHWI-LP	https://www.wish.com/merchant/584c1b4b334bb04d51503d88
111.	sunny	https://www.wish.com/merchant/584534057f6c0d4ca53569ae
112.	thumbup	https://www.wish.com/merchant/56fb6b2dc1bed17394d51c21
113.	tiancong	https://www.wish.com/merchant/5840f04134599a698571b66b
114.	timesq	https://www.wish.com/merchant/56efa671a9f07f5860ee6311
115.	wangguoqin	https://www.wish.com/merchant/5848e583d23c144d2c3b8781
116.	wangjing120803	https://www.wish.com/merchant/589b0e4bbe0fe74ff78f76a9
117.	wanglixia	https://www.wish.com/merchant/584139e6e88f6367d6ddc795
118.	Wasiteasy	https://www.wish.com/merchant/57e0ef2f3a02477561528254
119.	WJANU	https://www.wish.com/merchant/583c49150884751b85e98cef
120.	wudile	https://www.wish.com/merchant/57a2e9ebb2ea3e659e379098
121.	wumei150329	https://www.wish.com/merchant/584a46fba55ed20948d5d9f9
122.	xiaoxiaodedian	https://www.wish.com/merchant/5837f1032f5e53046e9cdeb2
123.	xindong	https://www.wish.com/merchant/57aec069d25a4018b733a48b
124.	xinglongzhuanqian	https://www.wish.com/merchant/582ec9368108914211fa2079
125.	xingstars	https://www.wish.com/merchant/570367598b7f1058f43e3363
126.	xuenvzhuang	https://www.wish.com/merchant/5848d9b068eb840a4ffe9905
127.	Xutao	https://www.wish.com/merchant/5819d4354199ad024c4f3eb3
128.	yangfanlsy	https://www.wish.com/merchant/5899bf818333d24fe970ff84
129.	zhanghongyue	https://www.wish.com/merchant/58e635492d91301f043a9bf0
130.	zhengzhi	https://www.wish.com/merchant/5784a8800d06001a7f062dfd

Exhibit 5

FILE MESSAGE

Case 1:22-cv-00202-PGG Document 104-5 Filed 07/25/22 Page 2 of 4

Ignore Delete Reply Reply All Forward More Meeting

Robofish -5229 To Manager Done Create New

Team Email Reply & Delete

Rules Move Actions

Mark Unread Categorize Follow Up

Translate Related Select

Zoom Zoom

iManage Work

Quick File Browse and File Save Attachments

Mon 1/31/2022 5:08 PM

Tom, Christopher

RE: ROKU INC. v THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A HERETO - Case No: 1:22-cv-00202-P

To Tom, Christopher

Cc Kavanaugh, Katie; Hutchinson, David; Cevalasco, Deanne; Moren, Harry; Rodriguez, Evelyn; '180071_001_Roku_Inc__Roku Litigation 1 Correspondence'

Bcc 'stevenmao@163.com'; 'feitianus@outlook.com'; 'flyinghuahua@outlook.com'; '1027389407@qq.com'; 'xiaolajiaoseller@163.com'; '1582610334@qq.com'; 'justfine123@outlook.com'; 'huqiulian@foxmail.com'; 'yiloutingfengyy@163.com'; 'ccc Zhang@126.com'; '2113435626@qq.com'; 'cherrypickelectronicsus@gmail.com'; 'winchimi@outlook.com'; 'sofabatonseller@hotmail.com'; '3343665046@qq.com'; '2707405968@qq.com'; 'xuuyuu2016@163.com'; 'sellerdodo@outlook.com'; 'yuanjiangseller@outlook.com'; 'tangzi650192@sohu.com'; '102098698@qq.com'; 'ope20722476@163.com'; 's6419953quanci@163.com'; 'xiataoxiong510@163.com'; 'mnadaoqi938@163.com'; 'michuang836@sohu.com'; 'jd2551310xierengt@163.com'; 'a063w6@163.com'; 'skoy82@163.com'; 'tryusdr@163.com'; 'raopu61169939@sohu.com'; 'gztopstore@126.com'; 'controlinnmorelia@outlook.com'; 'a05o00@163.com'; 'huanxian081161@sohu.com'; 'coz452@163.com'; 'justin160923@126.com'; 'ytpk854@163.com'; 'r5431985renyongs@163.com'; 'thw9y6@163.com'; 'fuyangfamen@163.com'; 'pengliw@163.com'; 'zixiwish@163.com'; 'lai814463yongdi@163.com'; 'herofun@163.com';

You forwarded this message on 2/4/2022 12:03 PM.

Message 22-cv-00202 - Order Adjourning PI Hearing.pdf (389 KB) 22-cv-00202 - Summons.pdf (371 KB) 22-cv-00202 - Complaint.pdf (5 MB)

ROKU INC. v THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A HERETO - Case No: 1:22-cv-00202-PGG

Dear Sir,

Please take notice that the Clerk of the Court has issued a Summons to Defendants in the above-referenced matter. Copies of the Summons and Complaint, which was previously served to you, are attached. Any answer or other response to the Complaint should be served upon counsel within twenty-one (21) days from receipt of this email, exclusive of the day of service, and filed with the Clerk of the Court, United States District Court for the Southern District of New York. Defendants are advised to seek legal counsel if they have not already done so.

Please also take notice that Court adjourned the preliminary injunction hearing from February 1 to February 8 at 11:45 am. The Court has also extended the deadline for Defendants to file opposing papers to Plaintiff's request for a preliminary injunction to February 3, 2022. Defendants should also address Plaintiff's request to extend the temporary restraints in this matter by that date. A copy of the Order is attached (specifically page 3).

These and other legal documents may be obtained from Plaintiff's attorneys at Thoits Law (kkavanaugh@thoits.com; hmoren@thoits.com; dcevasco@thoits.com; dhutchinson@thoits.com; and ctom@thoits.com) and on the following website: <http://roku-cases.com/case-22-cv-00202.html>.

Sincerely,

Chris Tom

FILE MESSAGE

Ignore X Delete Reply Reply All Forward More Meeting

Robofish -5229 To Manager Done Create New

Team Email

Reply & Delete

Rules

Move Actions

Mark Unread Categorize Follow Up

Translate Find Related Select

Zoom

Delete Respond Quick Steps Move Tags Editing Zoom

iManage Work

Quick File Browse and File Save Attachments

Mon 1/31/2022 5:08 PM

Tom, Christopher

RE: ROKU INC. v THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A HERETO - Case No: 1:22-cv-00202-

To Tom, Christopher

Cc Kavanaugh, Katie; Hutchinson, David; Cevalco, Deanne; Moren, Harry; Rodriguez, Evelyn; '180071_001_Roku_Inc__Roku Litigation 1 Correspondence'

Bcc 'a05o00@163.com'; 'huanxian081161@sohu.com'; 'coz452@163.com'; 'justin160923@126.com'; 'ytpk854@163.com'; 'r5431985renyongs@163.com'; 'thw9y6@163.com'; 'fuyangfamen@163.com'; 'pengliw@163.com'; 'zixiwish@163.com'; 'lai814463yongdi@163.com'; 'herofun@163.com'; 'r3e5@163.com'; 'u54223007jishi@163.com'; 'guxie604848029@163.com'; 'yupa912796533282@163.com'; 'zhongfei87988@sohu.com'; 'xilu6533497@163.com'; 'dixing7606368@sohu.com'; 'luchijiangxie@sohu.com'; 'coz312@163.com'; 'rcvv69@163.com'; 'jocelyn19830310@163.com'; 'qunguan694@sohu.com'; 'dannhouse19@hotmail.com'; 'ayiw92@163.com'; 'laceskong@163.com'; 'shahangbilie@sohu.com'; 'coz414@163.com'; 'nixiwish@163.com'; 'fenxian0282464@163.com'; 'shi83838298@sohu.com'; 'ml13632799615@163.com'; 'su6523gj5@163.com'; 'pcggy90xid@sohu.com'; 'tengou663751@sohu.com'; 'hjk878@sohu.com'; 'zhuo92575254@sohu.com'; 'a05tnk@163.com'; 'n4o41j@163.com'; 'monsterlady123@gmail.com'; 'jazai37189475@sohu.com'; 'narachoi486@gmail.com'; 'nice2seu@163.com'; 'chanellimbrick82003@gmail.com'; 'rtfdghb@yeah.net'; 'umkf935@163.com';

You forwarded this message on 2/4/2022 12:03 PM.

Message 22-cv-00202 - Order Adjourning PI Hearing.pdf (389 KB) 22-cv-00202 - Summons.pdf (371 KB) 22-cv-00202 - Complaint.pdf (5 MB)

ROKU INC. v THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A HERETO - Case No: 1:22-cv-00202-PGG

Dear Sir,

Please take notice that the Clerk of the Court has issued a Summons to Defendants in the above-referenced matter. Copies of the Summons and Complaint, which was previously served to you, are attached. Any answer or other response to the Complaint should be served upon counsel within twenty-one (21) days from receipt of this email, exclusive of the day of service, and filed with the Clerk of the Court, United States District Court for the Southern District of New York. Defendants are advised to seek legal counsel if they have not already done so.

Please also take notice that Court adjourned the preliminary injunction hearing from February 1 to February 8 at 11:45 am. The Court has also extended the deadline for Defendants to file opposing papers to Plaintiff's request for a preliminary injunction to February 3, 2022. Defendants should also address Plaintiff's request to extend the temporary restraints in this matter by that date. A copy of the Order is attached (specifically page 3).

These and other legal documents may be obtained from Plaintiff's attorneys at Thoits Law (kkavanaugh@thoits.com; hmoren@thoits.com; dcevasco@thoits.com; dhutchinson@thoits.com; and tom@thoits.com) and on the following website: <http://roku-cases.com/case-22-cv-00202.html>.

Sincerely,

Chris Tom

FILE MESSAGE

Ignore Delete Reply Reply All Forward More Meeting

Robofish - 5229 To Manager

Team Email Done

Reply & Delete Create New

Rules Actions

Mark Unread Categorize Follow Up

Translate Find


Related Select

Zoom

iManage Work

Quick File Browse and File Save Attachments

Mon 1/31/2022 5:08 PM

 Tom, Christopher

RE: ROKU INC. v THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A HERETO - Case No: 1:22-cv-00202-P

To Tom, Christopher

Cc Kavanaugh, Katie; Hutchinson, David; Cevasco, Deanne; Moren, Harry; Rodriguez, Evelyn; '180071_001_Roku_Inc__ Roku Litigation 1 Correspondence'

Bcc 'tengou663751@sohu.com'; 'hjhk878@sohu.com'; 'zhuo92575254@sohu.com'; 'a05tnk@163.com'; 'n4o41i@163.com'; 'monsterlady123@gmail.com'; 'jiazai37189475@sohu.com'; 'narachoi486@gmail.com'; 'nice2seu@163.com'; 'chanellimbrick82003@gmail.com'; 'rtfdghb@yeah.net'; 'umkf935@163.com'; 'tjzxingpzou315@163.com'; 'phonemoliss@sina.com'; 'kghqrj@163.com'; 'dsh3qa@163.com'; 'vnm268@163.com'; 'runandianli@163.com'; 'cdsjp67zznx@163.com'; 'benqingwish@163.com'; 'bqce32@163.com'; 'kanshao1277@sohu.com'; 'mushang70080944@163.com'; 'coz453@163.com'; 'thumbup1@163.com'; 'coz316@163.com'; 'timesq@163.com'; 'duren214143@163.com'; 'g858vb@163.com'; 'suyue921218@163.com'; 'vx8260@163.com'; 'bowdrc@163.com'; 'qdhqetognt19248@163.com'; 'furengyougukao@163.com'; 'a05lwi@163.com'; 'd6353541tanw@163.com'; 'coz450@163.com'; 'xingstars1@163.com'; 'zhuanghuan10695@163.com'; 'w8718594dishao@163.com'; 'a7k6de@163.com'; 'welpymp46@sohu.com'; 'rjwshimhuani89@163.com'; 'yuesen@hotmail.com'; 'vtinvan@163.com'

You forwarded this message on 2/4/2022 12:03 PM.

Message 22-cv-00202 - Order Adjourning PI Hearing.pdf (389 KB) 22-cv-00202 - Summons.pdf (371 KB) 22-cv-00202 - Complaint.pdf (5 MB)

ROKU INC. v THE INDIVIDUALS, CORPORATIONS, LIMITED LIABILITY COMPANIES, PARTNERSHIPS, AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE A HERETO - Case No: 1:22-cv-00202-PGG

Dear Sir,

Please take notice that the Clerk of the Court has issued a Summons to Defendants in the above-referenced matter. Copies of the Summons and Complaint, which was previously served to you, are attached. Any answer or other response to the Complaint should be served upon counsel within twenty-one (21) days from receipt of this email, exclusive of the day of service, and filed with the Clerk of the Court, United States District Court for the Southern District of New York. Defendants are advised to seek legal counsel if they have not already done so.

Please also take notice that Court adjourned the preliminary injunction hearing from February 1 to February 8 at 11:45 am. The Court has also extended the deadline for Defendants to file opposing papers to Plaintiff's request for a preliminary injunction to February 3, 2022. Defendants should also address Plaintiff's request to extend the temporary restraints in this matter by that date. A copy of the Order is attached (specifically page 3).

These and other legal documents may be obtained from Plaintiff's attorneys at Thoits Law (kkavanaugh@thoits.com; hmoren@thoits.com; dcevasco@thoits.com; dhutchinson@thoits.com; and ctom@thoits.com) and on the following website: <http://roku-cases.com/case-22-cv-00202.html>.

Sincerely,

Chris Tom

Exhibit 6



WARNING: Website Shut Down!

The online store that formerly used this domain has been disabled, pursuant to a U.S. federal court order, for the sale of products bearing counterfeit trademarks.

NOTICE TO DEFENDANTS

Case No: 1:22-cv-00202 : Roku Inc. v. The Individuals, Corporations, Limited Liability Companies, Partnerships, and Unincorporated Associations Identified on Schedule A.

The defendants operating the Defendants Internet Stores listed in Schedule A to the Complaint are hereby advised: Plaintiff has charged Defendants with violations of United States federal and state laws prohibiting trademark infringement and/or unauthorized copyrights. A copy of the Complaint and other legal documents may be obtained from Plaintiffs' attorney, **Katie P. Kavanaugh, kkavanaugh@thoits.com, 650-327-4200.**

Any answer or other response to the Complaint should be filed with the Clerk of the Court, United States District Court for the Southern District of New York within twenty-one (21) days from when the Complaint is received by you.

Defendants are advised to seek legal counsel.

Documents for Download

- Complaint ([View](#) | [Download PDF](#))
- Order to Show Cause for Preliminary Injunction and Temporary Restraining Order ([View](#) | [Download PDF](#))
- Order Adjourning Preliminary Injunction Hearing ([View](#) | [Download PDF](#))
- Proof of Service (as to Docket Nos. 22 and 29) ([View](#) | [Download PDF](#))
- Order Extending Temporary Restraining Order as to Certain Defendants ([View](#) | [Download PDF](#))
- Preliminary Injunction Order with Schedule A ([View](#) | [Download PDF](#))
- Summons ([View](#) | [Download PDF](#))

Copyright © 2021 | All Rights Reserved

Exhibit 7

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X

ROKU INC.,

Plaintiff(s),

22 Civ. 00202 (PGC)

- against -

**CLERK'S CERTIFICATE
OF DEFAULT**

THE INDIVIDUALS, CORPORATIONS, ET AL.

Defendant(s),

-----X

I, RUBY J. KRAJICK, Clerk of the United States District Court for

the Southern District of New York, do hereby certify that this action was commenced on
January 10, 2022 with the filing of a summons and complaint, a copy of the summons and

complaint was served on defendant(s) see First Amended Schedule A hereto,

by personally serving defendants by alternative service pursuant to January 20, 2022 Order,

and proof of service was therefore filed on January 31, 2022, **Doc. #(s)** 94.

I further certify that the docket entries indicate that the defendant(s) has not filed an
answer or otherwise moved with respect to the complaint herein. The default of the
defendant(s) is/are hereby noted.

Dated: New York, New York

July 15, 20²²

**RUBY J. KRAJICK
Clerk of Court**



By: _____
Deputy Clerk

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

ROKU INC.,)	
)	
Plaintiff,)	
)	
v.)	Case No.: 1:22-cv-00202
)	
THE INDIVIDUALS, CORPORATIONS, LIMITED)	
LIABILITY COMPANIES, PARTNERSHIPS, AND)	
UNINCORPORATED ASSOCIATIONS)	
IDENTIFIED ON SCHEDULE A HERETO,)	
)	
Defendants.)	
)	
)	
)	
)	
)	

FIRST AMENDED SCHEDULE A

Doe No.	Defendant Seller	Defendant Online Marketplace
11.	Gaudi	https://www.amazon.com/sp?seller=A3SXZVKR9JCQKK
13.	HzzgangDirect	https://www.amazon.com/sp?seller=A3E8ZAQLE3WB1O
34.	WINBOUS	https://www.amazon.com/sp?seller=A1KS4HXHOAA99V
43.	AuntbingluuX	https://www.wish.com/merchant/5f4f6120fedbc502820a2e6b
56.	Electronic outlet	https://www.wish.com/merchant/607e381db20cf82213520cfc
70.	huangchen123	https://www.wish.com/merchant/58410459a81dba0befad0921
74.	jinyuzhir	https://www.wish.com/merchant/603379a313006b0dc16faa2d
77.	kappdo	https://www.wish.com/merchant/5e062a89a57753146b033050
79.	laceskong	https://www.wish.com/merchant/56f8cb2d796b2f58ad96a139

Doe No.	Defendant Seller	Defendant Online Marketplace
86.	Loverhart	https://www.wish.com/merchant/5a1e5e65ffccf24b61ca68e1
89.	Mccmyy	https://www.wish.com/merchant/5b79265a559dbd25b255974e
93.	monsterlady	https://www.wish.com/merchant/5344c1a25aefb06607e48bcd
95.	mykshop	https://www.wish.com/merchant/5fd48a297885467e6b3935f6
97.	noral	https://www.wish.com/merchant/5a0956a00ec30f6ea1d5e36f
101.	phonemol	https://www.wish.com/merchant/58bd1f1f48f3a0527d18d535
103.	Richapex2016	https://www.wish.com/merchant/5856abd0913e184c9c72c0bf
106.	schaef	https://www.wish.com/merchant/5f42cc5ce84e07db8539ae63
126.	xuenvzhuang	https://www.wish.com/merchant/5848d9b068eb840a4ffe9905
127.	Xutao	https://www.wish.com/merchant/5819d4354199ad024c4f3eb3
129.	zhanghongyue	https://www.wish.com/merchant/58e635492d91301f043a9bf0