

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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

**PLAINTIFF’S REPLY IN SUPPORT OF APPLICATION FOR PRELIMINARY
INJUNCTION**

In accordance with the Court’s January 31, 2022 Order, Dkt. No. 29, Plaintiff Roku, Inc. submits this response in support of Plaintiff’s request for a preliminary injunction.

Only one defendant, “CHUNGHOP STORE,” filed an opposition to Plaintiff’s request for a preliminary injunction. See Dkt. No. 25. Defendant CHUNGHOP STORE subsequently moved to withdraw its opposition. Dkt. No. 32. Plaintiff is no longer seeking a preliminary injunction against Defendant CHUNGHOP STORE and has excluded this defendant from the concurrently filed [Proposed] Preliminary Injunction Order.

Per the Court’s February 1, 2022 order, Dkt. No. 31, the Temporary Restraining Order (“TRO”) in this matter will stay in place as to Defendant vtinva until the Court holds a preliminary injunction hearing as to vtinva, and vtinva has until March 7, 2022 to oppose Plaintiff’s request

for a preliminary injunction. Accordingly, Plaintiff has excluded Defendant vtinva from the concurrently filed [Proposed] Preliminary Injunction Order.

Similar to Defendant vtinva, Defendants Auteey, Carbonline, CØLIPSØ, JEM&JULES and USonline911 (“Auteey Defendants”) have moved for an extension of time regarding the preliminary injunction hearing. Plaintiff does not oppose the motion. Dkt. No. 33. If the Court grants the Auteey Defendants’ motion, then the Auteey Defendants should be stricken from the concurrently filed [Proposed] Preliminary Injunction Order.

Plaintiff has agreed with Defendants Buy & Delight, Melody Store, Sourcing Remote, and Value Foremost (“Buy & Delight Defendants”) on an extension of time on the same terms the Court granted as to Defendant vtinva. Although the Buy & Delight Defendants have not formally filed such a motion, if the Court grants such an extension of time, then the Buy & Delight Defendants should be stricken from the concurrently filed [Proposed] Preliminary Injunction Order.

There are no active oppositions to Plaintiff’s request for a preliminary injunction. Accordingly, Plaintiffs respectfully request that the Court enter the [Proposed] Preliminary Injunction Order, filed on February 4, 2022, as to the Defendants identified on Schedule A to the [Proposed] Preliminary Injunction Order.

Dated: February 4, 2022

Respectfully submitted,

/s/ Christopher Tom
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Memo Endorsed:

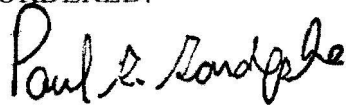
A preliminary injunction hearing as to Defendants vtinva, Auteey, Carbonline, CØLIPSØ, JEM&JULES, USonline911, Buy & Delight, Melody Store, Sourcing Remote, and Value Foremost will take place on March 15, 2022 at 10:00 a.m. These Defendants' time to respond to the Complaint and to file opposition papers to Plaintiff's request for a preliminary injunction is extended until March 7, 2022. Plaintiff's response to these Defendants' opposition papers is due by March 10, 2022. The TRO will remain in place as to these Defendants until the preliminary injunction hearing takes place.

The telephonic preliminary injunction hearing as to the remaining Defendants will go forward as scheduled tomorrow, February 8, 2022 at 11:45 a.m.

The Clerk of Court is directed to terminate the motion at Docket Number 33.

Dated: February 7, 2022

SO ORDERED.



Paul G. Gardephe
United States District Judge