

AO 440 (Rev. 05/00) Summons in a Civil Action

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

SUMMONS IN A CIVIL CASE

PATHWAY IP LAW,

V.

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

CASE NUMBER: 1:24-cv-05218

ASSIGNED JUDGE: Hon. Franklin U. Valderrama

DESIGNATED
MAGISTRATE JUDGE: Hon. Jeffrey T. Gilbert

TO: (Name and address of Defendant)

The Individuals and all other Defendants identified in the Complaint

YOU ARE HEREBY SUMMONED and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

Nicholas S. Lee
1475 E. Woodfield Road, Suite 800
Schaumburg, IL 60173

an answer to the complaint which is herewith served upon you, 21 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

THOMAS G. BRUTON, CLERK



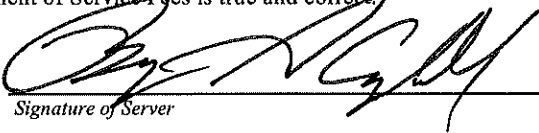
(By) DEPUTY CLERK



July 11, 2024

DATE

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RETURN OF SERVICE		
Service of the Summons and complaint was made by me ⁽¹⁾	DATE	
NAME OF SERVER (PRINT)	TITLE	
<p><i>Check one box below to indicate appropriate method of service</i></p> <p><input type="checkbox"/> Served personally upon the defendant. Place where served: _____</p> <p>_____</p> <p><input type="checkbox"/> Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.</p> <p>Name of person with whom the summons and complaint were left: _____</p> <p><input type="checkbox"/> Returned unexecuted: _____</p> <p>_____</p> <p>_____</p> <p><input type="checkbox"/> Other (specify): <u>I sent copies of the Complaint, Summons, TRO, and related documents to the email addresses associated with the Defendants as provided by third-party marketplaces and identified in Exhibit A to the Declaration of Benjamin A. Campbell</u></p>		
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <p>Executed on <u>August 8, 2024</u>  _____</p> <p style="margin-left: 150px;">Date</p> <p style="margin-left: 150px;">Signature of Server</p> <p style="margin-left: 150px;"><u>1475 E. Woodfield Road, Suite 800, Schaumburg, IL 60173</u></p> <p style="margin-left: 150px;">Address of Server</p>		

(1) As to who may serve a summons see Rule 4 of the Federal Rules of Civil Procedure.

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

PATHWAY IP LLC,

Plaintiff,

v.

THE INDIVIDUALS, CORPORATIONS,
LIMITED LIABILITY COMPANIES,
PARTNERSHIPS, and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON THE ATTACHED
SCHEDULE "A,"

Defendants.

Case No.: 1:24-cv-05218

Judge: Hon. Franklin U. Valderrama

Magistrate Judge: Hon. Jeffrey T. Gilbert

DECLARATION OF BENJAMIN A. CAMPBELL

I, Benjamin A. Campbell, declare as follows:

1. I am over the age of 18 years and not a party to this action. I am fully competent to make this declaration and I have personal knowledge of the facts stated in this declaration. To my knowledge, all of the facts stated in this declaration are true and correct.
2. I am a partner at the law offices of Bishop Diehl & Lee, Ltd., counsel for Pathway IP LLC, the plaintiff in this action. I make this declaration as proof that the Summons and Complaint were fully served upon the Defendants in this action by electronic mail.
3. On August 6, 2024, I sent electronic messages to the email addresses provided by the marketplace in connection with the Defendants' Merchant IDs, as well as to email addresses provided in Attorney Appearances in connection to opposing counsel.
4. The list of recipients of the electronic message I sent on August 6, 2024 is attached hereto as Exhibit A.

5. Attached to my electronic messages were copies of the Summons, the unredacted Complaint, the Temporary Restraining Order, the Court's July 9, 2024 Minute Entry (Dkt. 14) granting motion for alternative service (Dkt. 13), the Court's Order extending the Temporary Restraining Order as to certain Defendants, and Plaintiff's Motion for Leave to File an Amended Complaint (Dkt. 66).

6. I did not receive any error or undeliverable address responses from the electronic message I sent on August 8, 2024.

7. Alternative electronic service was completed on counsel consistent with our interpretation of relevant case law. *See e.g., In re Paraquat Prod. Liab. Litig.*, No. 3:21-md-3004-NJR, 2021 U.S. Dist. LEXIS 196892, at *8 (S.D. Ill. Oct. 13, 2021) (discussing alternative service under Rule 4(f)(3) and noting that U.S. counsel need not be separately authorized to accept service by their clients); *see also 1025 W. Addison St. Apts. Owner, LLC v. Grupo Cinemex, S.A. de C.V.*, No. 20-cv-06811, 2021 U.S. Dist. LEXIS 99131, at *20 (N.D. Ill. May 26, 2021) (discussing interplay between Rule 4(h), 4(f), and the Hague Convention and holding that service on U.S. Counsel is proper after a motion for alternative service is granted).

I declare under penalty of perjury that the forgoing is true and correct.

Executed on August 6, 2024, in Schaumburg, Illinois.

/s/Benjamin A. Campbell
Benjamin A. Campbell

EXHIBIT A

Def. #	Seller Alias	Email	Secondary Email
1	Legee Tech	dazzne01@163.com	
2	Luxsure-US	gooditem919@outlook.com	yang@shm.law yi.yi@shm.law
3	BINBIN-Direct	jaggers2024@outlook.com	
4	ATKTTOP Direct	laoweijiu01us@163.com	
5	BONFOTO	xzdkwy@163.com	dkonieczny@tdrlaw.com
6	Unicup US	uspeixuan1290@outlook.com	schiller@gtv-ip.com
7	vividNWUS	vividnwusama@yahoo.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
8	XingBoom	xingwangcaiamz@163.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
9	ShutterLight	shutterlightusama2@outlook.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
10	HiFocusiUS	hifocususama@gmail.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
11	ShiQiaoShang	shiqiaoshangam@163.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
12	Jinsnow	liuhongpingkin@163.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
13	XuanXiuUS	xuanxiuusama@gmail.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
14	Photo Guard	photoguard_amazon@yahoo.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
15	PANYINYING	xinxiaoyd512@sina.com	dkonieczny@tdrlaw.com
16	Qirui-US	ghoeyi026@sina.com	dkonieczny@tdrlaw.com
17	Sensynec	jutongchengshiye@163.com	twang@nilawfirm.com
18	xiechengyu-us	chenggu5673@hotmail.com	
19	fubin-us	ftj4spo0041@outlook.com	
20	gxlong-US	dnxi14515@outlook.com	
21	DISMISSED [17]		
22	DISMISSED [17]		
23	HUJIYUAN	dosjqx882@126.com	
24	HXT-us	knknoon4271@hotmail.com	
25	Kaiess Store	amber.chen@youwod.com.cn	zg2125@caa.columbia.edu
26	Wanfaau	wanfaa89@163.com	twang@nilawfirm.com
27	Woputne-US	aiweite01@qq.com	schiller@gtv-ip.com
28	Herrfilk	hongdianwangluo@sina.com	twang@nilawfirm.com
29	Kimwood Official	pucheng9924@hotmail.com	
30	CCJDSMUS	zhang914mj@outlook.com	
31	junwangqiangsji	junqiangw9571@outlook.com	
32	Tonglisheng	liubintls@outlook.com	

Def. #	Seller Alias	Email	Secondary Email
33	DISMISSED [17]		
34	xichenyouxianmaoyi	hang22864604@163.com	
35	Xin Fox	ewyrth22@outlook.com	
36	Winseting	winseting@outlook.com	
37	OMITTED		
38	INTENTIONALLY BLANK		
39	SHQ Global	shuihengqing1103@outlook.com	
40	STALLY	chenfengkeji_us@163.com	twang@nilawfirm.com
41	Okshopping	xiaolingli2015@hotmail.com	schiller@gtv-ip.com
42	XITENG TECH	xiteng23amz@163.com	twang@nilawfirm.com
43	Aixiangpai	gew2017@163.com	jamesliulaw@gmail.com
44	Rosesy	usrosesy@rosesy.com	
45	ULANZI Official US Store	yongnuo2017@qq.com	
46	DISMISSED [55]		
47	OMITTED		
48	iphoto digit	inseesi@hotmail.com	
49	BLights	brightlights2020@outlook.com	twang@nilawfirm.com
50	Lixinshunyi	lixinshunyitech@163.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
51	Peyou US Ltd	peyou.amazon@gmail.com	
52	OMITTED		
53	Lanyuantai	lanyuantaikejius@163.com	dkonieczny@tdrlaw.com
54	FLYSKY	14784412230@139.com	
55	DISMISSED [17]		
56	DISMISSED [45]		
57	Pixel Lighting	ruidexiang@hotmail.com	
58	catchpiccus	catchpiccusamazon@163.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
59	Bekada	billion666@163.com	
60	Yarrashop Direct	luxsure10@gmail.com	yang@shm.law yi.yi@shm.law
61	AMTLJ-US	tailaijunkeji@outlook.com	dkonieczny@tdrlaw.com
62	Jian jin company	tony.yang@jianjinmould.com	pwolfgram@stratumlaw.com
63	xingtaisuixi	tiye44840882@163.com	
64	Libaba Beauty	lithiumeight@outlook.com	
65	Auriani-US	jiameigao@outlook.com	dkonieczny@tdrlaw.com
66	Vlogging US	xuntongkeji_us@163.com	twang@nilawfirm.com
67	OMITTED		

Def. #	Seller Alias	Email	Secondary Email
68	WisaKey US	zhixuanmaoyi_us@163.com	twang@nilawfirm.com
69	EESTOREAMZ	fanyoong812@163.com	twang@nilawfirm.com
70	ruiao Photographic equipment	siwang@nbruiao.com	
71	OMITTED		
72	CY Direct US	cydirectus@163.com	
73	yunqiya	chiacloudam@outlook.com	
74	Weilisi	18823453600@qq.com	zg2125@caa.columbia.edu
75	QiHuichang	qihuichangtech@163.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
76	RUIHOTOR	ruihotao@outlook.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
77	iphotoxx	8818427@qq.com	brousseauj@gtlaw.com nelsonc@gtlaw.com
78	NAICEE	517376389@qq.com	
79	NovoNost-us	cheerlin19@163.com	dkonieczny@tdrlaw.com
80	INSSTRO	insstroazus@hotmail.com	
81	AIXIANGPAI	gew2017_us@163.com	jamesliulaw@gmail.com
82	DONGDONG	dongdongwalmart@163.com	