

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

POPILUSH LLC

Plaintiff,

v.

**THE PARTNERSHIPS AND
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A,”**

Defendants.

Case No. 1:25-cv-10581

Honorable Thomas M. Durkin

**Declaration of Nicholas Ronaldson in Support of Plaintiff’s Motion for Preliminary
Injunction**

1. Since September 30, 2025, the financial accounts associated with certain Defendants have been frozen.
2. Plaintiff does not seek a preliminary injunction at this time against Defendant No. 1 “ChicMe” and Defendant No. 4 “Halara” due to ongoing settlement discussions.¹ The TRO as to ChicMe and Halara can therefore be dissolved.
3. In accordance with the Service Order, Plaintiff will provide notice to Defendants. *See* Service Order, ¶¶3-4.
4. At least two Defendants discovered this lawsuit before their assets were frozen and before service or notification by Plaintiff.
5. At least one Defendant’s bank account had only \$0.01 left by the time the third party platform froze its account.

¹ Plaintiff reserves all rights to seek a preliminary injunction against Defendant No. 1 “ChicMe” and Defendant No. 4 “Halara” should settlement negotiations fail.

6. While it appears that all links offering infringing products for sale have been taken down, it remains unclear whether the assets of at least two Defendants—Defendant No. 3 Guangzhou Shixing Industrial Co., Ltd. and Defendant No. 6 Shantou Peijiasheng Clothing Co., Ltd. (“Alibaba Defendants”)—have been frozen.

7. Despite Popilush’s best efforts, and repeated communications, inquiries, and submissions to Alibaba, Popilush has received no update whether the Alibaba Defendants’ accounts have been frozen.

8. Only this morning (October 27, 2025) did the Alibaba Defendants links get shut down.

9. But as of the filing of this motion, Plaintiff has not received confirmation whether that conduct was done by the Alibaba Defendants or by Alibaba itself.

10. The status of the Alibaba Defendants’ accounts with Alibaba continues to remain unknown as Alibaba has been dilatory in complying with the Court’s TRO.

11. Popilush requests that the Court grant the motion for preliminary injunction as to the Defendants identified in Table 1.

The content of this declaration is to the best of my knowledge as of the date of this declaration based on the investigation to date. I reserve all rights to amend this declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: October 27, 2025

/s/ Nicholas J. Ronaldson
Nicholas J. Ronaldson

Table 1

Defendant No.	Defendant/Seller Alias	Identified Email Address
2	DHgate Seller	dhhuantuo@163.com
3	Guangzhou Shixing Industrial Co., Ltd.	larrycard@163.com
5	Mooslover	mooslover_us_os882@163.com
6	Shantou Peijiasheng Clothing Co., Ltd.	unl@unerl.cn
7	Malco Modes	wecare@malcomodes.biz