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

#### **POPILUSH LLC**

Plaintiff,

v.

Case No. 1:25-cv-10581

THE PARTNERSHIPS AND UNINCORPORATED ASSOCIATIONS IDENTIFIED ON SCHEDULE "A,"

Defendants.

Honorable Thomas M. Durkin

### Second Declaration of Nicholas J. Ronaldson in Support of Popilush's Ex Parte Motion for Temporary Restraining Order, Temporary Injunction, Temporary Asset Restraint, and Expedited Discovery

1. I provide this second declaration pursuant to the Court's following requirement:

The Court requires that any motion for a temporary restraining order and/or asset freeze is accompanied by a declaration from an attorney of record that provides the following information. First, to demonstrate the immediate harm necessary to grant the drastic remedy of an ex parte temporary restraining order, the declaration must confirm that each named defendant has sold or offered to sell the allegedly infringing product(s) within the last two months and describe the evidence supporting this confirmation. Generally, evidence that a defendant has sold or offered to sell the infringing products within the last two months may include: (1) screenshots of the listings collected within the last two months; (2) screenshots older than two months with an attestation that the listings reflected in the screenshots have been checked within the last two months and were active; or (3) evidence of a purchase by a customer in Illinois within the last two months. Second, as relevant to personal jurisdiction, without which any temporary restraining order or asset freeze would be invalid, the declaration must confirm that each named defendant sold at least one allegedly infringing product to a customer in Illinois and describe the evidence supporting this confirmation. Here, "sold" means that the defendant accepted an order and payment for an allegedly infringing product to be shipped to Illinois. Third, to assure that Court that the rights of defendants who have not yet been served are being appropriately protected, the declaration must identify the case number(s) and assigned judge(s) for any pending case(s) brought by the plaintiff(s) against any of the named defendants, noting whether the intellectual property at issue was the same or different than in this case. If it is the same, the declaration should describe the disposition of the other case. The Court will address any motion for a temporary restraining order only after receipt of the described declaration, which can be filed contemporaneously with the motion.

(https://www.ilnd.uscourts.gov/judge\_display.php?LastName=Durkin)

("Declaration

Requirement").

2. The first Declaration Requirement is satisfied because Plaintiff's claim charts are based off

of live screenshots taken within the last two months of the filing date. ECF No. 1 at Exs. 1, 3.

3. The second Declaration Requirement is satisfied because Defendant Seller Aliases have

sold at least one allegedly infringing product to a customer in Illinois. Exs. 1-7.

4. The third Declaration Requirement is satisfied because, to Plaintiff's knowledge, there are

no pending lawsuits brought by Plaintiff against any of the Defendant Seller Aliases identified in

Schedule A. See ECF No. 1 at Schedule A.<sup>1</sup>

5. 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 hereby declare under penalty of perjury that the foregoing is true and correct to the best

of my knowledge, information and belief.

Dated: September 18, 2025

/s/ Nicholas J. Ronaldson

Nicholas J. Ronaldson

<sup>1</sup> Out of an abundance of caution, Plaintiff further states that Plaintiff's representation is based on the Defendant Seller Aliases as currently identified in Schedule A. Because Plaintiff does not yet know the true identities of the Defendant Seller Aliases, it is possible that certain Defendants may be using false names or different entities. Plaintiff will update this representation if new information becomes available regarding the identities of the Defendants.

2





TikTok Inc.

Address: 5800 BRISTOL PKWY CULVER CITY CA 90230

Receipt #: 20250916-577108407482093680 Receipt date: September 16, 2025 17:11

Delivery address Sold by

Nicholas Ronaldson chicme

4017 N. Harding Avenue, Chicago, Illinois,

United States, 60618

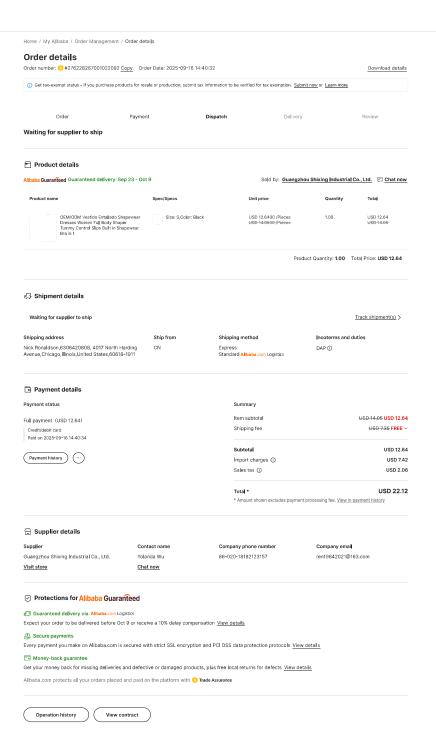
#### Order information

Order Number: 577108407482093680

Order Date: September 16, 2025 17:11

Description	Quantity		Unit discount price	
CHICME Square Neck Tummy Control Butt Lifter Thigh Slimmer Full Body Shaper Bodycon Dress Double Layer Built-In Shapewear Ribbed Mid-Length Dress			1	\$33.99
ChicMe Square Neck Bodycon Tummy Control Butt Midi Dress BUILT-IN SHAPEWEAR Slim Fit Casual Dresses for Women			1	\$39.99
		Subtotal		\$73.9
		Discounts		-\$10.0
		Shipping		Fre
		Taxes		\$6.5
		Total		\$70.5

Includes shipping, taxes, and duties.



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Product Listing Policy - Intellectual Property Protection - Privacy Policy - Terms of Use - User Information Legal Enquiry Guide - Integrity Compliance

® #0 1999-2024 Alibaba.com. All rights reserved. #8 #2092#8 #3010002000002#9 #882-20120091-4

9/16/25, 5:13 PM Order details



#### **Halara Order Confirmation**

noreply@thehalara.com <noreply@thehalara.com> Reply-To: noreply@thehalara.com To: nickronaldson@gmail.com Tue, Sep 16, 2025 at 4:43 PM

Order# 250916214311344139

# Halara

### Your order is confirmed!

Dear Valued Customer,

Thanks for shopping with us! Your order is expected to arrive within Standard Shipping (8-10 business days).

We operate on a near zero inventory model, meaning we only make items when they are ordered. This means that shipping times takes longer, but we believe that the future of our planet is more important. Using this near zero inventory model also allows us to make quality athleisure wear in premium fabrics at accessible prices.

To keep an eye on your order, we suggest downloading our app.

Thanks for your patience and understanding!

For easy tracking, please download our app.

Please note: Shipping volumes are surging this shopping season, so your delivery might take a little longer than usual.

We're also thrilled to share that our apparel will now showcase our logo, a step forward in showcasing the collective journey and the vibrant community we've built together with you. It's important to note that during this transition, you might encounter pieces without the logo. We're grateful for your patience and understanding as we make this shift towards a more unified brand presentation.

And colour naming updates may cause differences between packaging/tag and website descriptions.

View Your Order

Track your Order via APP and Get A \$100 Coupon

Add Your Body Measurement

### **Order Summary**



Retail Price:	\$54.95 USD
Item(s) Subtotal:	\$54.95 USD
Coupon: (Coupon Code:cbu100)	-\$13.74 USD
Shipping Fee(s):	\$9.90 USD
Points:	-\$0.00 USD
Tax:	\$5.24 USD
Payment Discount:	\$0.00 USD
Gift Card:	
Total:	\$56.35 USD

### **Customer Information**

#### **Shipping Method:**

Standard Shipping(8-10 business days)

Shipping Address	Billing Address	
Nicholas Ronaldson	Nicholas Ronaldson	
4017 N. Harding Ave	4017 N. Harding Ave	
Chicago ILLINOIS 60618	Chicago ILLINOIS 60618	
United States	United States	

If you have any further questions about your order, please get in touch with our customer service team at <a href="mailto:service@thehalara.com">service@thehalara.com</a>. We are here to assist you!

Cancel Order

Reorder

Made for What Moves You., The Halara Team

You May Also Like





Your order is confirmed

You'll receive a confirmation email with your order number shortly.

Order details <u>View account</u>

Contact information Payment method

nickronaldson@gmail.com 1000 · \$55.14 USD

Shipping address Billing address
Nicholas Ronaldson Nicholas Ronaldson
4017 North Harding Avenue 4017 North Harding Avenue

 Chicago IL 60618
 Chicago IL 60618

 United States
 United States

 +16306420808
 +16306420808

Shipping method

Standard

Order was completed with shop [7] Learn more

Order actions

Orders are cancellable within 24 hours of purchase.

Cancel

Need help? Contact us

Continue shopping



Estimated taxes (\*)

Women's Shapewear Dress Jumpsuit Tummy Tuck Lift Corset Open Crotch Suspender Tight Long Skirt Chest Pad Bodysuit Dress \$50.00

\$5.14

Subtotal \$50.00
Shipping 
FREE

Total USD \$55.14

### Order #2SY-133616

September 16, 2025



Wrap Style Bodycon Dress With Built In Shapewear Burgundy / S \$45.00

Subtotal \$45.00
Discount -\$11.25
Shipping \$10.00

Total \$43.75

### Payment method

Shop Pay \$43.75



## Shipping address

Nicholas Ronaldson 4017 North Harding Avenue Chicago Illinois 60618 United States +16306420808

### Billing address

Same as shipping address

### Shipping method

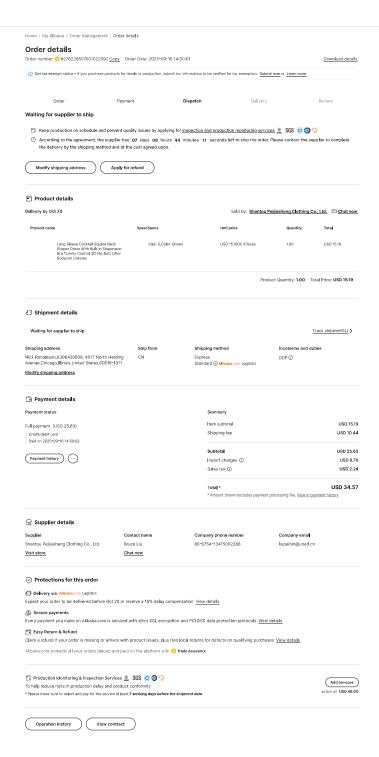
Standard Shipping

### **Email address**

nickronaldson@gmail.com

# Store





9/16/25, 5:15 PM Order details



#### Order Shipping: Your order 313807738550 Is On Its Way!

message

DHgate.com <marketing@e.dhgate.com>
Reply-To: "DHgate.com" <support-bbsqdgybf4t638auhy2xxb1sm0wyuj@e.dhgate.com>
To: nickronaldson@gmail.com

Thu, Sep 18, 2025 at 4:11 AM







Phones & Accessories
Jewelry & Watches

Sports & Outdoors Health & Beauty Baby & Toys Home & Garden

Hello nickronaldson,

YAY! Your order 313807738550 has shipped. Below you can find the shopping details and tracking number.

Check 'My Orders' in your DHgate account for more details.

Order Number: **#313807738550** 

Shipping Date: **2025.09.18** 

Track Number: **SF6045920287340** 

Shipped to: 4017 N. Harding Avenue Chicago Illinois US

Shipping Method: **P2711** 

How to track my order?

**Click for Details** 

#### **Order Details**



Crew Neck Shaper Dress Built-in

US \$ 34.39/Piece

US \$ 34.39

: US \$ 7.82

: US \$ 0 : US \$ 0

: US \$ 0

US \$ 42.21

**Click for Details** 

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