

**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

**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](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

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<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.

# **EXHIBIT 1**



# Receipt

TikTok Inc.  
Address: 5800 BRISTOL PKWY CULVER CITY CA 90230

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

## Delivery address

Nicholas Ronaldson  
4017 N. Harding Avenue, Chicago, Illinois,  
United States, 60618

## Sold by

chicme

## 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		\$73.98
Discounts		-\$10.00
Shipping		Free
Taxes		\$6.56
Total		\$70.54

Includes shipping, taxes, and duties.

# **EXHIBIT 2**

Order details

Order number: #276228267001022092 [Copy](#) Order Date: 2025-09-16 14:40:32 [Download details](#)

Get tax-exempt status - if you purchase products for resale or production, submit tax information to be verified for tax exemption. [Submit now](#) or [Learn more](#)

Order

Payment

Dispatch

Delivery

Review

Waiting for supplier to ship

Product details

Alibaba Guaranteed

Guaranteed delivery: Sep 23 - Oct 9

Sold by: [Guangzhou Shixing Industrial Co., Ltd.](#) Chat now

Product name	Spec/Specs	Unit price	Quantity	Total
<div>OEM/ODM Vestido Entallado Shapewear Dresses Women Full Body Shaper Tummy Control Slips Built In Shapewear Bra in 1</div>	Size: S,Color: Black	USD 12.6400 /Pieces USD-14.6500-/Pieces	1.00	USD 12.64 USD-14.65

Product Quantity: 1.00    Total Price: USD 12.64

Shipment details

Waiting for supplier to ship [Track shipment\(s\)](#) >

Shipping address	Ship from	Shipping method	Incoterms and duties
Nick Ronaldson,6306420808, 4017 North Harding Avenue,Chicago,Illinois,United States,60618-1911	CN	Express Standard <a href="#">Alibaba.com</a> Logistics	DAP

Payment details

Payment status

Full payment (USD 12.64)  
 Credit/debit card  
Paid on 2025-09-16 14:40:34

[Payment history](#)

Summary

Item subtotal  
Shipping fee

USD-14.65  
USD-7.35 FREE

Subtotal

Import charges

Sales tax

USD 12.64  
USD 7.42  
USD 2.06

Total \*

USD 22.12

\* Amount shown excludes payment processing fee. [View in payment history](#)

Supplier details

Supplier	Contact name	Company phone number	Company email
Guangzhou Shixing Industrial Co., Ltd.	Yolanda Wu	86-020-18182123157	ren19842021@163.com

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Protections for [Alibaba Guaranteed](#)

Guaranteed delivery via [Alibaba.com](#) Logistics

Expect your order to be delivered before Oct 9 or receive a 10% delay compensation [View details](#)

Secure payments

Every payment you make on Alibaba.com is secured with strict SSL encryption and PCI DSS data protection protocols [View details](#)

Money-back guarantee

Get your money back for missing deliveries and defective or damaged products, plus free local returns for defects [View details](#)

Alibaba.com protects all your orders placed and paid on the platform with Trade Assurance

[Operation history](#)

[View contract](#)



# **EXHIBIT 3**





Nick Ronaldson <nickronaldson@gmail.com>

## 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



### V-neck Zipper Bodycon Midi Work Built-in Mesh Shapewear Dress \*1

Zinfandel/XS

**\$41.21 USD** ~~\$54.95 USD~~

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

## Customer Information

### Shipping Method:

Standard Shipping(8-10 business days)

### Shipping Address

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

### Billing Address

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

If you have any further questions about your order, please get in touch with our customer service team at [service@thehalara.com](mailto:service@thehalara.com). We are here to assist you!

[Cancel Order](#)

[Reorder](#)

**Made for What Moves You.,  
The Halara Team**

## You May Also Like

# **EXHIBIT 4**

# Malco Modes



Confirmation #5W5FJFDUR

Thank you, Nicholas!

Your order is confirmed

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

## Order details

[View account](#)

### Contact information

nickronaldson@gmail.com

### Payment method

 \*\*\*\* 1000 · \$55.14 USD

### Shipping address

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

### Billing address

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

### Shipping method

Standard

Order was completed with 

[Learn more](#)

## Order actions

Orders are cancellable within 24 hours of purchase.

[Cancel](#)

Need help? [Contact us](#)

[Continue shopping](#)



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

\$50.00

Subtotal

\$50.00

Shipping ⓘ

FREE

Estimated taxes ⓘ

\$5.14

Total

USD \$55.14

# **EXHIBIT 5**

## Order #2SY-133616

September 16, 2025



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

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

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<b>Total</b>	<b>\$43.75</b>
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### Payment method

Shop Pay	\$43.75
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.... .... 1000 ⓘ

### 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



MOOSLOVER

# **EXHIBIT 6**



Home / My Alibaba / Order Management / Order details

Order details

Order number: #276228507001022092 [Copy](#) Order Date: 2025-09-16 14:50:01 [Download details](#)

Get tax-exempt status - If you purchase products for resale or production, submit tax information to be verified for tax exemption. [Submit now](#) or [Learn more](#)

Order

Payment

Dispatch

Delivery

Review

Waiting for supplier to ship

Keep production on schedule and prevent quality issues by applying for [Inspection and production monitoring services](#)

According to the agreement, the supplier has 07 days 08 hours 44 minutes 11 seconds left to ship the order. Please contact the supplier to complete the delivery by the shipping method and at the cost agreed upon.

Modify shipping address

Apply for refund

Product details

Delivery by Oct 20

Sold by: [Shantou Peijiaosheng Clothing Co., Ltd.](#) [Chat now](#)

Product name	Spec/Specs	Unit price	Quantity	Total
Long Sleeve Cocktail Square Neck Shaper Dress With Built In Shapewear Bra Tummy Control 3D Hip Butt Lifter Bodycon Dresses	Size: S,Color: Brown	USD 15.1900 /Pieces	1.00	USD 15.19

Product Quantity: 1.00 Total Price: USD 15.19

Shipment details

Waiting for supplier to ship

[Track shipment\(s\)](#) >

Shipping address	Ship from	Shipping method	Incoterms and duties
Nick Ronaldson,6306420808, 4017 North Harding Avenue,Chicago,Illinois,United States,60618-1911	CN	Express Standard <a href="#">Alibaba.com</a> Logistics	DDP

[Modify shipping address](#)

Payment details

Payment status

Full payment (USD 25.63)  
Credit/debit card  
Paid on 2025-09-16 14:50:02

Payment history

Summary

Item subtotal	USD 15.19
Shipping fee	USD 10.44
<b>Subtotal</b>	<b>USD 25.63</b>
Import charges	USD 6.70
Sales tax	USD 2.24
<b>Total *</b>	<b>USD 34.57</b>

\* Amount shown excludes payment processing fee. [View in payment history](#)

Supplier details

Supplier	Contact name	Company phone number	Company email
<a href="#">Shantou Peijiaosheng Clothing Co., Ltd.</a>	Bruce Liu	86-0754-13415002286	lupeibin@uner.cn

[Visit store](#)

[Chat now](#)

Protections for this order

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To help reduce risks in production delay and product conformity

\* Please make sure to select and pay for the service at least 7 working days before the shipment date.

Add services

as low as USD 48.00

Operation history

View contract

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

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Messenger

https://biz.alibaba.com/ta/detail.htm?orderId=276228507001022092

1/2



# **EXHIBIT 7**

Order Shipping: Your order 313807738550 Is On Its Way!

1 message

DHgate.com <marketing@e.dhgate.com>  
Reply-To: "DHgate.com" <support-bbsqdybf4t638auhy2xxb1sm0wyuj@e.dhgate.com>  
To: nickronaldson@gmail.com

Thu, Sep 18, 2025 at 4:11 AM



- Phones & Accessories
- Jewelry & Watches
- Sports & Outdoors
- Baby & Toys
- Health & Beauty
- 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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