

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

ATELIER EUMORI

Plaintiff,

v.

THE PARTNERSHIPS AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE “A”,

Defendants.

Civil Action No. 2:26-cv-899

JURY TRIAL DEMANDED

FILED UNDER SEAL

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**PLAINTIFF’S MOTION TO SEAL**

Atelier Eumori (“Plaintiff”) brings this case against The Individuals, Partnerships, And Unincorporated Associations Identified In Schedule “A” (collectively, “Defendants”) for their unlawful conduct in promoting, advertising, distributing, having manufactured, importing, offering for sale, and selling Infringing Products through online commerce platforms including, but not limited to, Amazon.com. (“Online Marketplaces”). Defendants’ Infringing Products infringe Registered United States Copyrights asserted in the Original Complaint (the “Asserted Copyright”) owned by Plaintiff, throughout the United States including Pennsylvania and this Judicial District.

Defendants’ Infringing Products use images that are substantially similar by Plaintiff’s copyrighted work, which embody the claimed design of the Asserted Copyright. Plaintiff submits this application to the Court to file under seal the documents associated with the above-referenced action including, but not limited to: (1) this Motion to Seal; (2) Plaintiff’s Complaint For Damages and Injunctive Relief and Exhibits thereto; (3) Plaintiff’s Ex Parte Motion For Temporary Restraining Order Including: A Temporary Injunction, A Temporary Asset Restraint, And Expedited Discovery and Proposed Order; (4) Memorandum Of Law In Support Of Plaintiff’s Ex

Parte Motion For Temporary Restraining Order Including: A Temporary Injunction, A Temporary Asset Restraint, And Expedited Discovery including Declarations and Exhibits thereto; (5) Plaintiff's Motion For Authorization To Perform Electronic Service Of Process Under Fed.R.Civ.P. 4(f)(3) and Proposed Order; (6) Memorandum Of Law In Support Of Plaintiff's Motion For Authorization To Perform Electronic Service Of Process Under Fed.R.Civ.P. 4(f)(3) including Declaration and Exhibits thereto; (7) all accompanying case initiating filings; and (8) any Orders granting a Temporary Restraining Order or authorizing Electronic Service.

Good cause exists to file the foregoing under seal. A variety of courts, including Courts in this Judicial District, have granted the requested relief in similar cases based on, inter alia:

- a. Defendants' control of their pseudo-anonymous online commerce storefronts (Defendants' "Online Storefronts") and seller identifiers set forth in Schedule "A" to the Complaint (Defendants' "Seller IDs") associated with the Online Marketplaces.
- b. Defendants' ability to: change the ownership of or modify the data and content of their Online Storefronts; change payment accounts; redirect consumer traffic to other seller identification names; and transfer assets and ownership of the Seller IDs.
- c. Defendants can make such modifications/transfers in a short period of time and, upon information and belief, will do so immediately after receiving notification of this action.
- d. Defendants can easily transfer and/or hide the funds and assets sought to be restrained through electronic means, can do so promptly after receiving notice of the relief sought through Plaintiff's Complaint and associated ex parte filings, and will thereby alter the status quo and reduce or eliminate the Court's ability to grant meaningful relief to Plaintiff.

- e. In view of the foregoing and Defendants' unlawful conduct as set forth in the Complaint, Plaintiff believes that Defendants will transfer and/or hide their assets rather than maintain them for discovery and recovery.

See, e.g., DDC Technology v. Shenzhentaifeikejiyouxiangongsi (D/B/A Thafikzi) and The Other Individuals, Partnerships, And Unincorporated Associations Identified In Schedule "A", No. 2:23-cv-00006-WHS, slip op. (W.D. Pa. Jan. 3, 2024) Jacki Easlick, LLC v. CJ Emerald, No. 2:23-cv-02000-WSS, slip op. (W.D. Pa. Nov. 20, 2023) (granting motion to seal); Doggie Dental Inc. v. Go Well, No. 2:19-cv-01282 (W.D. Pa. Oct. 9, 2019) (same); see also XYZ Corp. v. The P'Ships and Uninc. Assoc. Identified on Schedule A, No. 1:21-cv-06471, 2022 WL 180151, at \*2 (N.D. Ill. Jan. 20, 2022) ("in the ordinary Schedule A case, plaintiffs are routinely permitted to keep the defendants' identities under seal until the plaintiffs' inevitable requests for temporary restraining orders and asset restraints have been adjudicated (and they are nearly always granted).").

Accordingly, Plaintiff respectfully requests that the filings in this action remain under seal until at least the Order on Plaintiff's Ex Parte Motion For Temporary Restraining Order Including: A Temporary Injunction, A Temporary Asset Restraint, And Expedited Discovery, or until further order of the Court.

A Proposed Order granting the Motion to Seal is being submitted concurrently herewith.

May 13, 2026

Respectfully submitted,

By: /s/ Xiyan Zhang  
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