UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

DOPE ECOMMERCE LLC, a Delaware Limited Liability Company,

Plaintiff,

Case No.: 24-cv-02384

v.

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

Defendants.

PLAINTIFF'S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Dope Ecommerce, LLC ("Plaintiff") files this Motion requesting leave to file the following documents under seal: (1) Schedule A which will identify Defendants' currently known aliases and Online Marketplaces and (2) Exhibit 2 to the Declaration file in connection with Plaintiff's Memorandum of in Support of Plaintiff's Motion for Entry of a Temporary Restraining Order, including a Temporary Injunction, a Temporary Asset Restraint, and Expedited Discovery (to be filed) which will contain documentary evidence of Defendants' rampant infringement.

Plaintiff is requesting temporary *ex parte* relief based on an action for trademark infringement/counterfeiting and copyright infringement. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order, negating the purpose of the *ex parte* proceeding. Once the temporary restraining order has been served on the relevant parties and the third-party service providers have complied, Plaintiff will move to unseal these documents.

Respectfully submitted,

Date: March 25, 2024

<u>/s/ Eric Misterovich</u> Eric Misterovich (P73422) Revision Legal, PLLC 205 North Michigan Avenue, Ste. 810 Chicago, IL 60601 269-281-3908 <u>eric@revisionlegal.com</u>

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

The undersigned certifies that on the date below the foregoing was served on counsel of record via the Court's ECF system.

Date: March 25, 2024

<u>/s/ Eric Misterovich</u> Eric Misterovich (P73422) Revision Legal, PLLC 205 North Michigan Avenue, Ste. 810 Chicago, IL 60601 269-281-3908 <u>eric@revisionlegal.com</u>

Attorneys for Plaintiff