

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

Justin Alexander, Inc.	)	
	)	
v.	)	Case No. 1:17-cv-4402
	)	
John Does 1-72	)	Judge: Hon. Andrea R. Wood
	)	
	)	Magistrate: Hon. Susan E. Cox
	)	
	)	
	)	

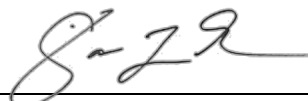
**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on at June 27, 2017 at 9:00AM, or as soon thereafter as may be heard, Plaintiff Justin Alexander, Inc. shall appear before the Honorable Andrea R. Wood or any judge sitting in his or her stead in Courtroom 1925 of the U.S. District Court of the Northern District of Illinois, Eastern Division, 219 South Dearborn St., Chicago, Illinois and shall present the **Plaintiff’s Motion to Exceed Page Limitation, Plaintiff’s Motion for Leave to Temporarily Seal Documents, and Plaintiff’s Ex Parte Motion for Entry of a (1) Temporary Restraining Order, (2) An Order to Temporarily Transfer the Infringing Websites, (3) Asset Restraining Order, (4) Expedited Discovery Order, and (5) Service of Process by Email and Electronic Publication Order.**

Dated this 21<sup>st</sup> Day of June, 2017.

Respectfully submitted,

By:



\_\_\_\_\_  
David Gulbransen  
Attorney of Record  
Counsel for Plaintiff Justin Alexander, Inc.

David Gulbransen (#6296646)  
Law Office of David Gulbransen  
159 N. Marion Street, Suite 172  
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**PLAINTIFF’S *EX PARTE* MOTION FOR LEAVE TO TEMPORARILY SEAL  
DOCUMENTS**

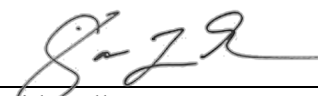
Pursuant to Local Rule 5.8 and Fed. R. Civ. P. 26(c)(1), Plaintiff, Justin Alexander, Inc., (“Plaintiff”) files this Motion for Leave to Temporarily Seal Documents (“Motion to Seal”) requesting leave to file the following documents under seal: (1) Plaintiff’s Complaint and Schedule “A” attached to the Complaint that includes a list of the infringing websites; (2) WHOIS contact information and registration data for the infringing websites (Exhibit 1 to the Declaration of David Gulbransen); and (3) screenshot printouts from the infringing websites showing each instance of trademark and copyright infringement (Exhibit 3 to the Declaration of David Gulbransen).

In this case, Plaintiff is requesting temporary ex parte relief based on an action for trademark counterfeiting and false designation of origin under the Lanham Act, copyright infringement under the Copyright Act, and deceptive trade practices under Illinois State law. Sealing these limited portions of the file is necessary to prevent the Defendants from learning of

these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings prematurely, the likely result would be the destruction of relevant documentary evidence, the hiding or transferring of assets to foreign jurisdictions, and the transfer or disablement of the infringing websites. See Declaration of Suren Ter Saakov at ¶¶ 11-13. Such acts would frustrate the purposes of the underlying law and would interfere with this Court's power to grant relief. Once the temporary restraining order has been served on the relevant parties and the requested actions are taken, Plaintiff will promptly move to unseal these documents.

Dated this 18<sup>th</sup> Day of June, 2017.

Respectfully submitted,

By:   
\_\_\_\_\_  
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Attorney of Record  
Counsel for Plaintiff Justin Alexander, Inc.

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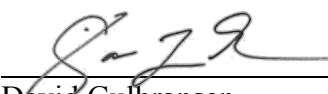
**PLAINTIFF’S MOTION TO EXCEED PAGE LIMITATION**

Plaintiff Justin Alexander, Inc. ("Justin Alexander"), by and through its undersigned counsel, respectfully request that they be given leave to file their brief in support of Plaintiff’s *Ex Parte* Motion For Entry of a (1) Temporary Restraining Order, (2) An Order to Temporarily Transfer the Infringing Websites, (3) Asset Restraining Order, (4) Expedited Discovery Order, and (5) Service of Process by Email and Electronic Publication Order (collectively, the “Ex Parte Application for TRO”) in excess of 15 pages.

Plaintiff’s *Ex Parte* Motion for a TRO includes five (5) separate Motions regarding Justin Alexander’s intellectual property rights, each of which must be decided simultaneously. Justin Alexander’s brief contains necessary substantive content relevant to each separate Motion that should be considered. Justin Alexander’s brief is 46 pages, which is substantially less than the 75 page limit allowed if all four motions were filed separately. Plaintiff, therefore, respectfully requests that they be granted leave to file a combined brief in excess of 15 pages for purposes of efficiency.

Dated this 18<sup>th</sup> Day of June, 2017.

Respectfully submitted,

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Attorney of Record  
Counsel for Plaintiff Justin Alexander, Inc.

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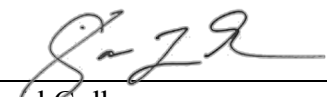
**PLAINTIFF'S *EX PARTE* MOTION FOR ENTRY OF A (1) TEMPORARY  
RESTRAINING ORDER, (2) AN ORDER TO TEMPORARILY TRANSFER THE  
INFRINGEMENT WEBSITES; (3) ASSET RESTRAINING ORDER, (4) EXPEDITED  
DISCOVERY ORDER, AND (5) SERVICE OF PROCESS BY EMAIL AND  
ELECTRONIC PUBLICATION ORDER**

Plaintiff's Justin Alexander, Inc. seek entry of an ex parte (1) Temporary Restraining Order, (2) An Order to Temporarily Transfer the Infringing Websites, (3) Asset Restraining Order, (4) Expedited Discovery Order, and (5) Service of Process by Email and Electronic Publication Order on an action arising out of 15 U.S.C. § 1114, Section 43(a) of the Lanham Act, 15 U.S.C. § 1125(a), 17 U.S.C. §§ 501(a), and the Illinois Uniform Deceptive Trade Practices Act, 815 ILCS § 510. A Memorandum of Law in Support is filed concurrently with this Motion.

Dated this 18<sup>th</sup> Day of June, 2017.

Respectfully submitted,

By:

  
\_\_\_\_\_  
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Counsel for Plaintiff Justin Alexander, Inc.

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