

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

**XYZ CORPORATION,**

**Plaintiff,**

**v.**

**THE UNINCORPORATED ASSOCIATIONS  
IDENTIFIED IN SCHEDULE A,**

**Defendants.**

**Civil Action No. 23-673**

**PLAINTIFF'S *EX PARTE* MOTION FOR TEMPORARY ASSET RESTRAINT  
AND EXPEDITED DISCOVERY**

Plaintiff XYZ Corporation by counsel and pursuant to 15 U.S.C. § 1116, 35 U.S.C. § 283, and Federal Rule of Civil Procedure 65, hereby moves for a Temporary Restraining Order, including a temporary asset restraint and expedited discovery.

For the reasons set forth in Plaintiff's accompanying memorandum, Plaintiff respectfully requests that this Court (1) issue a temporary restraining order freezing the assets of Defendants' PayPal and Alipay accounts; and (2) permit limited expedited discovery directed to eBay, PayPal, AliExpress, Alipay, and Wish in order to determine Defendants' identity, the amount and location of the profits of Defendants' counterfeiting and infringement, and the scope of Defendants' activities.

Date: May 23, 2023

Respectfully submitted,

/s/ Monica Riva Talley

Monica Riva Talley (VSB No. 41840)

Nicholas J. Nowak (*pro hac pending*)

STERNE KESSLER GOLDSTEIN & FOX P.L.L.C.

1100 New York Ave., NW

Washington, DC 20005

Telephone No.: (202) 371-2600

Facsimile No.: (202) 371-2540

mtalley@sternekessler.com

nnowak@sternekessler.com

*Attorneys for Plaintiff*